



**The Sandford
St Martin Trust**

Promoting Excellence
in Broadcasting about
Religion, Ethics and Spirituality

Consultation on a change of ownership of Channel 4 Television Corporation

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Submitted by

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“Had (Channel 4) not been there, or had it been a purely commercial broadcaster, interested only in ratings and not the sort of public service television we make, the maths behind our business plan would not have added up. The same is true for countless television production companies across the UK...”

David Olusoga, historian, filmmaker, and founder of Uplands Television.

About the Sandford St Martin Trust

- i. In keeping with the Trust’s activity and area of expertise, this submission will focus on how a change of ownership at Channel 4 will impact a key element of public service broadcasting - religious and ethical content.
- ii. Through its work the Sandford St Martin Trust advocates for thought-provoking, distinctive broadcasting that engages with belief and enhances the public understanding of religion. We believe a) the media have an increasingly important and challenging role to play in interpreting world events, b) this cannot be done without acknowledging the complex roles religions play in both contemporary and historical human experience and c) a religiously literate media can support greater understanding, increase tolerance, and foster stronger communities at local, national and global levels.
- iii. Since 1978 the Trust has made annual awards for the best broadcast content about religion, ethics or spirituality. The Sandford St Martin Awards are the UK’s only media awards focussing on what Ofcom identifies as “core public service broadcasting”¹ and are open to a wide range of genres – news, current affairs, factual, arts, music, drama and comedy - as well as to ‘traditional’ religious broadcasting. Winners are decided by panels of media professionals. Radio Times readers also vote in their thousands for their favourite TV or radio programme exploring religion, spirituality or ethics from a list published in that magazine.
- iv. In addition to its awards, the Trust advocates at industry, regulatory and government levels for the place of this content in a healthy and diverse media ecosystem. Our outreach work promotes belief, religion or ethics as important and rewarding subjects for content-makers and audiences to engage with. In recent years, we have produced events in partnership with the Commission for Belief in Public Life, the Edinburgh International Television Festival, Full Fact, House of St Barnabas, the Media Society, NUJ Training, Sheffield Doc/Fest and many more. More details can be found on our website: www.sandfordawards.org.uk
- v. The Trust is politically independent and is not affiliated with any media company or organisation. It does not proselytise on behalf of or promote any religion or faith, nor does it engage in religious activities itself. Our board is made up of leading and senior industry figures who have experience working across a range of broadcasting sectors and platforms and represent a wide variety of perspectives and faith backgrounds.

¹ Ref: Ofcom Review of Public Service Television Broadcasting: Phase 1: Is television special (2006), para 16.

“My generation grew up thinking that religion was completely marginal to British life, which, as for the rest of the world, has been proved more and more wrong.”

Simon Schama, historian and Sandford St Martin 2014 Award winner.

Question 2: Would Channel 4, with continued public service broadcasting licence and remit, be better placed to deliver sustainably against the government’s aims for public service broadcasting if it was outside public ownership?

- vi. No. It is clear from more than a decades’ worth of research available that were Channel 4 outside public ownership, key public service genres would be all but completely eradicated - including religious and ethical broadcasting.
- vii. Having reviewed the government’s consultation documents, the Trust is concerned at the lack of any detailed analysis or impact assessment regarding how a change in ownership would affect either the provision of a high quality and quantity of religious and ethical broadcast content or of the viability of the many British independent production companies making content in this genre which depend on Channel 4 for their business.
- viii. Based on a combination of our own research and that of other organisations concerned with the UK’s broadcast sector, it is our belief that the privatisation of Channel 4 would result in a shift from the corporation’s current prioritisation of its public service obligations to new priorities aimed at satisfying and serving shareholders. The effect of this would be the demise of religious and ethical content provision on the channel like what has already happened on the UK’s other mainstream commercial channels.²
- ix. In its 2015 review of the UK’s public service broadcasting (PSB), Ofcom identified religious programming as one of several “immediate issues” of concern³ because of the increasing risk that in an increasingly highly competitive commercial market “broadcasters and super-indies together may not want to commission non-profitable PSB genres”.⁴
- x. Concurrent research by the strategic advisory firm Mediatique described PSB expenditure on religion and ethics first-run, original content as a “stark illustration of declines”. Its report concluded “This (decline) is in effect a ‘best case’ scenario, particularly in the context of distressed PSB type genres...as revenues decline, and broadcasters seek to shave costs in line, they will continue to be incentivised to spend disproportionately on popular genres (drama; entertainment; factual entertainment) to maintain audiences, reducing to a bare minimum their expenditure on specialist genres... **There will be no incentive to make more than the regulatorily**

² <https://www.telegraph.co.uk/news/religion/7846218/ITV-will-broadcast-just-one-hour-of-religious-programming-this-year.html>
<https://www.theguardian.com/media/2004/aug/26/ofcom.itv>

³ ‘Public Service Broadcasting in the Internet Age’, para 2.4,
http://stakeholders.ofcom.org.uk/binaries/consultations/psb-review-3/statement/PSB_Review_3_Statement.pdf

⁴ *ibid*, Section 6.20

imposed number of hours in ‘pure’ PSB genres (where quotas exist) or to spend more than the bare minimum per hour”.⁵

- xi. Mediatique’s warning has proven apt. In its most recent (2020) PSB review, Ofcom found the provision of original programmes in the religion and ethics genre had declined **by a further 6%** since 2015.
- xii. In its review, Ofcom identified several key areas of public service offering as being particularly at risk: arts, children’s, formal education and **religion** programmes. Considered together, these key genres represented only 6% of total PSB investment in first-run UK content.⁶
- xiii. Research collated by Mediatique found the decline in PSB expenditure on religious content has also been declining, constituting a larger drop than in any of the other 12 genres considered in the period between 2016-2019.⁷
- xiv. While as it might be assumed that this ‘hole’ in the broadcast schedule could be filled by broadcasters operating in the commercial sector, keen to attract audiences neglected by PSBs – this has not been so. Data submitted to Ofcom by these commercial broadcasters indicates **there was no original UK content spend in religious and education programming in 2018 by any major UK channel other than the PSBs.**⁸
- xv. Considered together, it is clear that **“without a strong and enforceable public service requirement the market is unlikely to provide trustworthy religious programming of a good standard”**. This was **the conclusion of** two additional pieces of research commissioned by Ofcom: *How Online Media Services Have Fulfilled the Public Service Objectives*⁹ and *Investment in TV Genres*¹⁰.
- xvi. The Trust would go further to caution that the withdrawal of mainstream broadcasters from this sector poses a significant danger to the public good. Along with other industry experts and government agencies, the Trust has noted the proliferation in recent years of online and digital “narrow-casting” to specific, sometimes extreme, religious interest groups in the UK.¹¹
- xvii. Interviews on the growth of televangelism in the United States conducted by Dr Caitriona Noonan, a lecturer in Media and Communication at Cardiff University, found that for many people the proliferation of Christian television fronted by religious leaders “was (considered) an unacceptable promotion of the views of the religious right, masked as wholesome ‘American

⁵ *ibid*, pg 35 (emphasis ours)

⁶ ‘Small Screen: Big Debate – a five-year review of Public Service Broadcasting (2014-18)
https://www.ofcom.org.uk/data/assets/pdf_file/0013/192100/psb-five-year-review.pdf

⁷ ‘Future models for the delivery of public service broadcasting’ Mediatique, Dec 2020, ref: pg. 22-23,
https://www.smallscreenbigdebate.co.uk/data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf

⁸ (Ref: pg. 16, Small Screen: Big Debate Consultation - The Future of Public Service Media,
https://www.smallscreenbigdebate.co.uk/data/assets/pdf_file/0032/208769/consultation-future-of-public-service-media.pdf)

⁹ https://www.ofcom.org.uk/data/assets/pdf_file/0024/75075/1_ofcom_report.pdf

¹⁰ https://www.ofcom.org.uk/data/assets/pdf_file/0027/78714/investment_in_tv_genres.pdf

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/263181/ETF_FINAL.pdf

social values'... (politicising) causes, thereby dragging it down from the level of principle and ultimate values to that of political wrangling and expediency.”¹²

- xviii. It is the Trust's contention that if mainstream, secular public service broadcasters such as Channel 4 leave vacant the broadcast space currently dedicated to trustworthy religious and ethical content, audiences will have no alternative to the more partisan and politicised content increasingly available via internet platforms, at the cost of general religious literacy.

“If our cultural arbiters vacate the field on which our young people wrestle with the great questions, then other forces will step in. And if we don't help young people grapple with the complexity of those questions, then there are other people who will cheerfully come along with murderously simple answers.”

Frank Cottrell-Boyce, Sandford Award winner and Chair of Judging Panel.

Question 4: Should the government revise Channel 4's remit and obligations to ensure it remains relevant in an evolving broadcast market? If yes, what changes should be made (which could include new freedoms or changes to its obligations)?

- xix. The Trust supports Channel 4's current public service remit and its obligation to offer independent and distinctive content reflecting the interests of different communities across the UK but believes its remit should be updated to include a quota for religious and ethical broadcasting. We believe such a change will ensure Channel 4 remains relevant and will continue to provide a critical public service within the evolving broadcast market.
- xx. We note comments made by a panel of media experts speaking at the Trust's recent *“What 4? How will privatisation affect religious diversity on Channel 4?”*¹³ event who emphasised the unique place Channel 4 holds in the UK's broadcast ecology and how this has enabled the channel to deliver invaluable public service content to audiences not being reached by other broadcasters or by streaming services.
- xxi. Maggie Brown, the historian, journalist and author of two books on the history of Channel 4 spoke of Channel 4's role in bringing diversity into the mainstream via broadcast events such as its Paralympics coverage. Previous Channel 4 programming around the Hajj¹⁴ and the

¹² Dr Caitriona Noonan: 'The Production of Religious Broadcasting: The Case of the BBC' (2008) p.22
<https://core.ac.uk/download/pdf/40053804.pdf>

¹³ Sandford St Martin Media Salon: 'What 4? How will privatisation affect religious diversity on Channel 4?' (September 9, 2021)
<https://www.sandfordawards.org.uk/what-4/>

¹⁴ <https://www.channel4.com/programmes/the-hajj-the-greatest-trip-on-earth>

4thought.tv¹⁵ project were cited as examples of how Channel 4 supported religious diversity and religious literacy under the direction of a head of religion.

- xxii. All panel members agreed that, in the words of Marcus Ryder, Head of External Consultancies at the Sir Lenny Henry Centre for Media Diversity, *“Religion consistently does well (with audiences)”*.
- xxiii. Aaqil Ahmed, former head of religion at both Channel 4 and the BBC also speaking on the panel emphasised that part of Channel 4’s remit which requires it to reflect and make content for diverse communities. Religiosity, he said, is “on the growth” in Britain and if public service broadcasters do not address the growing demand for content made for and by representatives of these communities then the debate over the ownership of Channel 4 *“will be irrelevant because public service broadcasting will mean nothing to broad sections of the country.”*¹⁶
- xxiv. The most recent census findings suggest the representation of diverse faith communities behind and in front of the cameras is becoming ever more important. Looking forward to the publication of the 2021 census results, Peter Brierley, an expert on religion statistics, has predicted both an increase in religiosity and a “quite substantial” increase in the proportion of the population identifying with non-Christian faiths because of immigration and higher birth rates in some minority communities.¹⁷
- xxv. While it is true that the 2011 census indicated a continuing erosion in Christian identity, the Trust notes that this decline does not translate into a lack of interest in religious or ethical issues. Drawing on her own recent research into what she terms the UK’s “post-Christian” era, Abby Day, professor of race, faith and culture at Goldsmiths, University of London, said *“Post-Christians are motivated by ethics concerning gender and sexual equality, social justice, climate change and compassion”*.¹⁸
- xxvi. Drawing on these demographic trends and the comments of the media experts cited above, the Trust would urge that Channel 4’s current public service remit should be strengthened to safeguard the quantity and quality of diverse religious and ethical broadcast content available to UK audiences. We are, however, sceptical that such a remit would be supported by a private owner.
- xxvii. As a privately-owned business Channel 4 would be obliged to protect and maximise revenue for shareholders. We believe as a result, its attitude to risk and to the development and commissioning of more innovative and resource-demanding content would harden and much valuable public service content would no longer be considered good business.
- xxviii. We note with concern recent comments by Channel 4’s Chief Content Officer Ian Katz who said “the level of depth” of the news as well as programmes featuring under-represented voices would be endangered by privatisation.¹⁹ This would include internationally-renowned Channel 4 strands

¹⁵ <https://www.theguardian.com/media/2010/jun/22/channel-4-religious-programming>

¹⁶ Sandford St Martin Media Salon, *ibid*

¹⁷ <https://www.theguardian.com/uk-news/2021/mar/20/less-than-half-of-britons-expected-to-tick-christian-in-uk-census>

¹⁸ <https://www.theguardian.com/uk-news/2021/mar/20/less-than-half-of-britons-expected-to-tick-christian-in-uk-census>

¹⁹ <https://www.bbc.co.uk/news/entertainment-arts-57567168>

such as *Dispatches* and *Unreported World* which have built their reputations on journalism unafraid of exploring the impact of religion on politics, economics and culture, and in so doing provide a valued public service.

- xxix. The Trust would like to draw attention to the breadth of excellent, distinctive religious and ethical British-made content commissioned by Channel 4 under its current remit exemplified by recent Sandford St Martin Award winners such as the drama *It's a Sin* (SSM/Radio Times Readers' Award winner, 2021), *Ramadan in Lockdown* (SSM Trustees Award, 2021) and *For Sama* (SSM TV/Video Award winner, 2020).
- xxx. We note that Channel 4 has also been responsible for such surprisingly religious-content-rich, audience-favourites as *Gogglebox* - which first introduced UK audiences to Rev Kate Bottley - and *We Are Lady Parts* which "takes all the cliches about women in hijab being uniformly submissive or oppressed and immediately kicks them to the curb with the toe of a Doc Marten boot."²⁰
- xxxi. The Trust believes all the programmes and programme strands cited above have contributed to the public understanding of religion in the UK. All were/are made by innovative independent production companies who have drawn on the communities from which they have sprung, the regions where they are based and the experiences of a diverse production teams to deliver Channel 4's remit.

"Everyone is desperately wanting to talk about what it's like to be a human being, all the time. It's what connects us to people. And if we don't get to talk about those things because it seems like they're the big poncey questions – and only certain kinds of people talk about things like that, in certain kinds of places and certain kinds of ways - then we're all sort of diminished and we starve."

Michael Sheen, actor and Sandford St Martin 2020 Award winner.

Question 6: With reference to the supporting evidence, what would the economic, social and cultural costs and benefits of Channel 4 moving out of public ownership be on:

A. Overall audience experience?

- xxxii. Based on the evidence cited in response to Question 2 of this consultation, it is the Trust's belief that under new ownership
- there would be less space for programmes dealing with religion or ethics,
 - a drop in overall investment in original content,
 - a decline in the UK's vibrant and diverse production ecology,
 - and subsequently, less audience access to this valuable PSB content.
- xxxiii. Speaking to the Banff World Media Festival in June this year, the screenwriter, television producer and Sandford St Martin 2021 Award winner, Russell T Davies said privatising Channel 4 would "stifle" diverse voices. *"Part of the government's reasoning for selling is that there is more*

²⁰ 'We Are Lady Parts Rocks Outside the Box' <https://www.vulture.com/article/we-are-lady-parts-peacock-series-review.html>

*choice now because of the streamers... that means more choice of zombies, ghosts, detectives – they certainly don't make shows like (mine)."*²¹

- xxxiv. That the public across all generational groups continues to highly value the kind of content made by Russell T Davies and the increasingly diverse cohort of British production companies is evidenced both by audience figures²² but also in research by Ofcom which younger audiences particularly depend upon PSBs such as Channel 4 for “programmes that reflect the full range of cultures and viewpoints of the people in the UK” and “specialist programmes about the history, science, **religion** or the arts”²³
- xxix. The Trust’s own research indicates that audiences also highly value and will seek out programming that represents faith in a positive manner. Channel 4 series such as *Ramadan in Lockdown* are appreciated by audiences both within and outside Muslim communities as “an impressive snapshot of people for whom religion is central to their lives, and who can find, in the rigorous discipline of their fast, pride, celebration, and solidarity”.²⁴
- xxxv. It is generally acknowledged that we are living in a time of increasing political disenfranchisement and hardening cultural divides.²⁵ Audiences seek to see themselves, their stories and their values depicted in the media they are offered.
- xxxvi. It follows that to be of public service, broadcasters must feature the voices of a broader range of contributors and the respectful engagement and inclusion of people with different beliefs on air. In a multi-platformed media ecosystem increasingly dominated by social media where religious stereotypes and misreporting contribute to social unrest and can even endanger lives, this social contract is ever more critical.
- xxxvii. Commercial broadcasters such as those streaming services and online media platforms that have proliferated in the current mixed broadcast ecology operate under no such social contract. They have no obligation to reach out beyond the status quo or to represent or reflect Britain’s diverse communities.
- xxxviii. In the absence of a strong and equally diverse public service broadcasting system, the Trust believes non-regulated broadcasters would fill the space to the detriment of the audience’s general religious literacy and to inter-community cohesion.

²¹ <https://www.radiotimes.com/tv/drama/russell-t-davies-channel-4-privatisation-newsupdate/>

²² <https://www.bbc.co.uk/news/entertainment-arts-55902840>
<https://deadline.com/2021/01/its-a-sin-ratings-russell-t-davies-aids-channel-4-hbo-max-1234680430/>

²³ The Impact of Lockdown on Audiences’ Relationship with PSB, pg.14-15,
https://www.ofcom.org.uk/data/assets/pdf_file/0024/199104/exploration-of-peoples-relationship-with-psb.pdf

²⁴ <https://www.churchtimes.co.uk/articles/2020/29-may/books-arts/tv/tv-review-ramadan-in-lockdown-grayson-s-art-club-what-s-the-matter-with-tony-slattery-climbing-blind-and-sink-or-swim>

²⁵ <https://www.nytimes.com/2020/04/21/opinion/coronavirus-india.html>
<https://www.theguardian.com/us-news/2020/apr/04/america-rightwing-christian-preachers-virus-hoax>
<https://fullfact.org/news/muslims-uk-viral-poster-factchecked/>
<http://ciris.org.uk/wp-content/uploads/2018/02/TPNRD-Religion-and-Fake-News.pdf>

C. Investment in the independent production sector?

- xxxix. The Trust would draw the consultation's attention to the significant proportion of Sandford St Martin Awards TV/Video winners and finalists made by independent production companies and teams based outside London for Channel 4²⁶. These programmes have been made and these production companies have flourished because Channel 4's unique model and remit have supported them to do so. It is the Trust's belief that should Channel 4 be privatised and become part of a larger – possibly international - media group, the opportunities for these companies as well as many independent producers representing the UK's regions will be greatly diminished.
- xl. Cat Lewis the CEO of the Manchester-based TV production company Nine Lives Media which makes *Songs of Praise* in addition to programmes for Channel 4's *Dispatches* is clear that the channel's public service obligation to commission programmes has been key to the growth of her company. *"It's a real concern that this important part of its public service remit will be threatened if the channel is privatised. Although Salford's MediaCityUK is a wonderful development, creating thousands of jobs – the merger of the regional ITV companies over the last 20 years has resulted in ... far fewer TV career opportunities for talented people who are based outside London. We and other companies based in the north provide vital entry points for young people to both gain work experience and kick start their careers."*²⁷
- xli. The Trust notes that Channel 4 is currently obliged to commission UK content from the independent production sector and works with around 300 creative companies across the UK every year. As a self-sustaining social enterprise surplus commercial revenues raised from the market have been reinvested back into British public service content from independent UK producers.²⁸
- xlii. Figures compiled by the Voice of the Listener and Viewer indicate that this unique financial model has resulted in the rapid and sustained growth of the UK's creative industries sector, contributing £111.7bn to the economy and supporting around 10,000 jobs.²⁹
- xliii. We note that these figures pre-date the move of Channel 4's headquarters from London to Leeds this year. It is our belief that with under the current model, in keeping with the aims of the 2016 Conservative Party's manifesto, this move will stimulate business and help to rebalance the UK's economy away from London and will grow the UK's creative economy.
- xliv. Indeed, we are pleased to note recent reports that the corporation is currently two years ahead of its target to spend half of its content budget outside of London.³⁰

²⁶ <https://sandfordawards.org.uk/the-awards/awards-archive/>

²⁷ <https://www.manchestereveningnews.co.uk/business/business-news/opinion-privatising-channel-4-would-11803182>

²⁸ Voice of the Listener and Viewer (August 2021): <https://www.vlv.org.uk/news/channel-4-privatisation-vlv-briefing/>

²⁹ *ibid*

³⁰ *ibid*

Conclusions

- xlv. It is the Trust's belief that this is a critical moment for the future of religious and ethical broadcasting in the UK.
- xlvi. As evidenced in this submission, the rapid evolution of media markets, shaped by the emergence of streaming services and video on demand, declining spend and output by public service broadcasters, and, other market developments, either individually or in combination, have been detrimental for core religious output.
- xlvi. Yet, at the same time, there is significant consumer demand and a public need for high quality content that explores religious and ethical themes, contributing to religious literacy and social cohesion.
- xlvi. The Sandford St Martin Trust have long argued that to ignore religion is to leave a gaping hole at the heart of public service broadcasting. Broadcasting, because of its reach, should be at the frontline of promoting tolerance and understanding across a range of social differences. Insomuch, all PSB's should be obliged to provide such coverage and to make good any deficiency in this vital strand of public service broadcasting.
- xlix. Our review of the available evidence has led us to the conclusion that under privatisation not only would the quality and quantity of religious and ethical programming and content on Channel 4 decline, but that it would be at risk of extinction.
- i. As a result, we feel we must challenge and object to the government's prioritisation of questions around the ownership of Channel 4 ahead of conducting any substantive review of Channel 4's public purpose and how it will deliver these in the future.
- ii. **The Sandford St Martin Trust would therefore urge and recommend that**
- **there should be no change in the ownership of Channel 4**
 - **the channel's current remit and public obligations should be updated and strengthened to protect genres such as religious broadcasting**
 - **and the corporation should continue to be required to act only in the public's social and economic interests.**