



Submission to Ofcom

Call for evidence: Small Screen: Big Debate – The Future  
of Public Service Media

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Submitted by

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*“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.

### About the Sandford St Martin Trust

- i. The Sandford St Martin Trust promotes thought-provoking, distinctive broadcasting that engages with belief, ethics or morality 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 promote greater understanding, increase tolerance and foster stronger communities at local, national and global levels.
- ii. Since 1978 the Trust has made annual awards for the best broadcast content about belief, religion, ethics and spirituality. The Sandford St Martin Awards are the UK’s most prestigious prize for religious broadcasting and are open to a wide range of genres – news, current affairs factual, arts, music, drama and comedy - as well as to ‘traditional’ religious programming. 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.
- iii. The Trust also advocates - at industry, regulatory and government levels - for the importance of broadcasting about religion as part of a healthy and diverse media ecosystem. Our outreach work promotes religion as an important and rewarding subject for content-makers and audiences to engage with. 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](http://www.sandfordawards.org.uk)
- iv. 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 particular religion or faith, nor does it engage in religious activities itself. Our Trustees include people with many years’ experience of broadcasting and representing a wide variety of perspectives and faith backgrounds.

*“Religion sounds boring to some and contentious to others. But what it is to me is a wonderful source of stories about what it is to be human and a huge part of many people’s lives”*

Jimmy McGovern, screenwriter and Sandford St Martin 2018 Award winner

### Question 1: Do you agree that a new regulatory framework for PSM delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused? p39

- v. We note with concern that Ofcom has renamed PSB as Public Service Media without clearly defining PSM’s scope or benefits. In the absence of a definition, for the purposes of this submission we shall define PSM as content provided by the institutions which currently provide PSB, but not restricted to specific TV and radio platforms as it is now. However, it is our belief

- that the public service broadcasters have a vital role to play in the provision of religious broadcasting and to blur the definition of this role would be hugely damaging.
- vi. We do not agree that a new regulatory framework for PSM delivery should support a more flexible 'service neutral' delivery approach. Our concern is that such an approach would do nothing to safeguard the availability and prominence (including at 'peak times' on mainstream broadcast channels) of religious and ethical content across all services/platforms.
  - vii. We support Ofcom's identification of religious broadcasting as "core public service broadcasting territory"<sup>1</sup>. We note also the Parliamentary Select Committee on BBC Charter Review's assertion that "broadcasting covering religion and other beliefs is part of the remit of all public service channels"<sup>2</sup>, and that Section 264(6) of the Communications Act 2003 requires that public service broadcasting in the UK must include services of a suitable quality and range dealing with a number of subjects including "religion and other beliefs"<sup>3</sup>
  - viii. As far back as 2015, Ofcom described religious programming as one of several "immediate issues" of concern: "There are some immediate issues emerging from our review: news consumption and the provision of news for young people, drama that reflects and portrays British society back to a British audience, content tailored to the specific needs of the UK Nations and their regions, **religious programming**, children's programming and investment in other areas such as music and arts."<sup>4</sup>
  - ix. Despite this, in the years since Ofcom raised a red flag regarding the future of religious programming, we have watched with dismay the ongoing dramatic decline in hours and investment across PSBs. Channel 4 and ITV, in particular, have made no investment in religious programming since this element of their PSB requirement was removed.
  - x. Research by Mediatique for the latest stage of this review found **a decline of 2.2% in PSB Religious and Ethical content expenditure between 2016-2019 – a larger drop than in any of the other 12 genres considered.**<sup>5</sup>
  - xi. Looking forward to 2024, Mediatique goes on to forecast a "stark illustration of declines" in PSB expenditure on Religion and Ethics first-run original content and says "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 imposed number of hours in 'pure' PSB genres (where quotas exist) or to spend more than the bare minimum per hour.**"<sup>6</sup>
  - xii. Ofcom itself has noted that arts, education and religion and ethics continue to have limited provision on PSBs and, further, that the hours of religion and ethics programming broadcast declined 6% between 2014 - Ofcom's last PSB review – and 2018.<sup>7</sup>
  - xiii. It has noted that these genres are supplemented by content available on-demand, online, on podcasts or radio, however the usefulness of this provision is called into question by a Comscore report in 2019 that found that the reach and impact of these content services varies

<sup>1</sup> Ofcom Review of Public Service Television Broadcasting: Phase 1: Is television special (2006), para 16

<sup>2</sup> Select Committee on BBC Charter Review Second Report (2006), para 141

<http://www.publications.parliament.uk/pa/ld200506/ldselect/ldb/128/128i.pdf>

<sup>3</sup> Communications Act 2003 <https://www.legislation.gov.uk/ukpga/2003/21/contents>

<sup>4</sup> Ofcom, "Public Service Broadcasting in the Digital Age" July 2015 Para 2.4, *emphasis ours*

[http://stakeholders.ofcom.org.uk/binaries/consultations/psb-review-3/statement/PSB\\_Review\\_3\\_Statement.pdf](http://stakeholders.ofcom.org.uk/binaries/consultations/psb-review-3/statement/PSB_Review_3_Statement.pdf)

<sup>5</sup> Mediatique, 'Future models for the delivery of public service broadcasting' Dec 2020, pg. 22-23, Figure 16: *emphasis ours*. [https://www.smallscreenbigdebate.co.uk/\\_data/assets/pdf\\_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf](https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf)

<sup>6</sup> *ibid*, pg 35, Figure 29, *emphasis ours*

<sup>7</sup> Ofcom, "Small Screen: Big Debate – a five-year review of Public Service Broadcasting (2014-18)", pg 21, [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0013/192100/psb-five-year-review.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0013/192100/psb-five-year-review.pdf)

considerably. For example, though “BBC websites have the third highest reach in the UK of any internet property... the amount of time UK adults spend on BBC websites accounts for just 2% of their internet use has been decreasing year on year”.<sup>8</sup>

- xiv. Further, data submitted to Ofcom by broadcasters for the latest review suggests **there was no original UK content spend in religious and education programming in 2018 by any major UK channel other than the PSBs.**<sup>9</sup>
- xv. Yet, audience research has found that consumers across all generational groups and particularly younger audiences, prioritise “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” are thought to be particularly important service aspects of PSB.<sup>10</sup>
- xvi. Despite the evidenced decline in overall PSB religious and ethical content available, we have noted that the BBC – which, it is true, has led among PSBs when it comes to religious and ethical content delivery – points to recent figures showing “it exceeded many of its own targets for religion”<sup>11</sup>.
- xvii. This raises two questions: 1) whether its targets are too low and 2) whether the BBC, like the other PSBs, would reduce its religious and ethical content if quotas were loosened.
- xviii. We are grateful to Ofcom for its vigilance in the area of religious broadcasting and the BBC. As attendants at the recent Westminster Media Forum “The Future of the BBC” policy event, (February 23, 2021) we welcomed Ofcom’s Group Director for Content and Media Policy, Kevin Bakhurst’s identification of religion as one of the areas where the BBC has PSB responsibilities. We noted with some dismay, however, that the main BBC speaker made no mention of religion or the BBC’s strategy regarding output in this area in her address.
- xix. Reporting on the event, The Times quoted Bakhurst as saying: “(Ofcom) will step in where in our judgment the BBC’s commitments don’t deliver its mission or public purposes or where the BBC doesn’t meet its commitments”<sup>12</sup>.
- xx. We should therefore like to flag our concern that the BBC seems to have lost focus on this area since the publication of its internal Religion and Ethics Review<sup>13</sup> which we strongly welcomed at the time of its publication in December 2017.
- xxi. In the Review, the BBC pledged to ‘raise its game’ by: creating ‘internal specialist networks’ (including the appointment of a Religion Editor in BBC News); improving religious literacy inside the BBC, with case studies and briefings; broadening the BBC’s engagement with stakeholders such as Sandford St Martin Trust; and partnering with other organisations to host a “Belief Summit” which would “inform our understanding of the role that different beliefs play in our society... We are planning for this Summit to take place every two years”<sup>14</sup>.
- xxii. Overall accountability for the delivery of the review’s proposals was laid on the Directors of the BBC’s output divisions, while “on top of this, the responsible BBC Director, currently James Purnell, will lead on strategy development, ways of working, and performance reporting...”<sup>15</sup>

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<sup>8</sup> Ibid, pg 21. Further reference: Comscore MMX Multi-Platform, Age: 18+, Monthly average Jan 2016-June 2019, UK.

<sup>9</sup> Ofcom, “Small Screen: Big Debate Consultation: The Future of Public Service Media”(2020) para 3.9, pg. 16, *emphasis ours*.

[https://www.smallscreenbigdebate.co.uk/\\_data/assets/pdf\\_file/0032/208769/consultation-future-of-public-service-media.pdf](https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0032/208769/consultation-future-of-public-service-media.pdf)

<sup>10</sup> Ofcom, “The Impact of Lockdown on Audiences’ Relationship with PSB”, July 2020, pg. 14-15, *emphasis ours*.

[https://www.smallscreenbigdebate.co.uk/\\_data/assets/pdf\\_file/0024/208761/psb-jigsaw-impact-of-lockdown-report.pdf](https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0024/208761/psb-jigsaw-impact-of-lockdown-report.pdf)

<sup>11</sup> The Times “BBC’s arts and religion shows at risk in plan to loosen strict quotas”, 24/02/21,

<https://www.thetimes.co.uk/article/bbcs-arts-and-religion-shows-at-risk-in-plan-to-loosen-strict-quotas-pl6lrmvq7>.

<sup>12</sup> Ibid

<sup>13</sup> BBC Religion and Ethics Review (2017)

[http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/religion\\_and\\_ethics\\_review.pdf](http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/religion_and_ethics_review.pdf)

<sup>14</sup> Ibid, pg 29

<sup>15</sup> Ibid, pg 28

- xxiii. We recognise that the pandemic has created great logistical problems for the BBC, and it has a new Director General and board. But progress on these pledges has been slow and in October 2020 James Purnell left the BBC. The BBC has not yet announced who is taking over his role as “the responsible BBC Director” who will be leading the overall thinking in this area. Nor has the BBC clarified the commissioning and scheduling structure for religion and ethical content (which is split between TV and radio). Separately, the Religion Editor in BBC News named in 2017 is not currently working.
- xxiv. Despite our reservations, the BBC has been a shining beacon in this genre compared with the commercial PSBs (as stated in our paragraph ix. above). Here we feel that Ofcom has been far less vigilant, as referenced by David Elstein, Chairman of openDemocracy.net and Broadcasting Policy Group in evidence to the House of Lords Select Committee on Communications Report: A Privatised Future for Channel 4?
- xxv. Elstein said “...The problem with Ofcom in relation to Channel 4, Channel 3 and Channel 5 is that it lost a huge amount of expertise in 2003 when the merger took place. The way the IBA and the ITC, its successor, operated was very detailed, using expert people holding ITV licensees to very direct scrutiny. All that went. It was partly because Ofcom and the legislation went down the route of language rather than actual quantification, which I much regretted and was very critical of the whole idea of looking at the purposes and characteristics of public service broadcasting. It is like telling a horticulturist, “All you need to do is be able to smell the flowers”. You need a lot more than that. You need expertise and design.
- xxvi. “The problem is that Ofcom does not seem to be able to do that particular job. I will give you a well-known example. In 2009, still recovering from the severe advertising recession of 2008, ITV announced that it was going to chop its regional news and current affairs budgets. It said to Ofcom, “What we are going to do is either merge a lot of our reporting, so we will have super regions, or everything will be cut across the board. Take your choice”. Ofcom felt it was Hobson’s choice, each was bad, and it chose what it thought was the least bad option. Ofcom should have said, “Okay, until your profits recover you can do this. As soon as your profits return to £250 million a year”— they are now £840 million a year—“all this must be restored”. It failed to do that. What we have now is an immensely profitable ITV, which has been allowed to get away with a short-term measure to chop its obligation to news and current affairs regionally. Ofcom does not know how to intervene on Channel 4 to do better. It publishes triennial reports on public service broadcasting in which it bitterly regrets the collapse of key public service areas, such as arts, education, religion and so on, and does not say to Channel 4, “Come on, guys, put it right”.<sup>16</sup>
- xxvii. In his evidence, Elstein goes on to urge that any legislation that goes forward needs to “strengthen its content board”, that all PSBs should be held to account, and Ofcom should actively enforce PSB obligations.
- xxviii. It is the ongoing failure of the PSBs to meet their own targets and obligations when it comes to religious broadcasting that has led us to conclude that in the absence of quantitative targets and a clearly articulated and enforced remit for religious broadcasting, the more flexible “service neutral” framework being proposed would result in an even steeper decline in PSB expenditure on religious and ethical content, resulting in even less UK original content in this genre being made, and the ghettoisation of religion and ethics to less prominent, “niche” platforms under a PSM umbrella.

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<sup>16</sup> House of Lords: Select Committee on Communications Report: A Privatised Future for Channel 4?, July 2016, pg 105-106, *emphasis ours*.

<https://www.parliament.uk/globalassets/documents/lords-committees/communications/sustainabilityofC4/SC4Evidence.pdf>

*“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 2015 Award winner

#### Question 5: What are the options for the future funding of PSM and are there lessons we can learn from other countries' approaches? p52

- xxix. Lessons on the dangers of deregulation and the elimination of PSB funding for religious and ethical content can be learned by examining the American example and the growing politicisation of the genre in the US over the last few decades.
- xxx. Deregulation of the US television networks in the 1970s resulted in the growth of new channels entirely dedicated to religion and of televangelism fronted by religious leaders such as Pat Robertson and others who solicited public donations to support their programming and other activities.
- xxxi. According to the academic Dr Caitriona Noonan, now a lecturer in Media and Communication at Cardiff University, this “commercialisation” of prominent religious and ethical content provision resulted in increasing concerns around the commodification of spiritual belief but also around “the underlying political agenda that was being promoted through these programmes. To many, this was an unacceptable promotion of the views of the religious right, masked as wholesome ‘American social values’... (politicising) causes, thereby dragging it down from the level of principle and ultimate values to that of political wrangling and expediency.”<sup>17</sup>
- xxxii. Historically, broadcasting in America has been considered a primarily commercial enterprise and televangelism, as described above, could only arise in a broadcasting ecosystem without the authority of public service broadcasting, where space was vacated for privately funded interests to move in and dominate this part of the audience-share.
- xxxiii. In the UK today, where there has been a rapid proliferation of SVODs and growth of non PSB online media platforms, there are parallels to be drawn between the American example and what potentially will be an increasingly fragmented PSM. It is our concern that should the quantity and quality of religious content provided by PSBs further decline, or should they “marginalise” their offering, moving it to less accessible or less prominent platforms, as happened in the US non-regulated broadcasters would fill the space to the detriment of general religious literacy.
- xxxiv. In her study, Dr Caitriona Noonan noted that while many of the respondents to her survey saw “the value of the internet and ‘on-demand’ services, there were also some suggestions that the future of the dedicated religious output may not be on terrestrial television or radio at all, but on niche channels such as God TV and Premier Television and Radio.” She noted that some people “used the American phenomenon of televangelism as a warning of the problems that this could bring (such as the exploitation of vulnerable members of the public) and argued that a move like this would further ghettoise religious broadcasting in the long-term. Therefore, the majority of the respondents...(felt religious broadcasting) should remain a responsibility for all terrestrial broadcasters.”<sup>18</sup>
- xxxv. Echoing these concerns, Mediatique’s research for Ofcom says “.. it is almost certain that a commercial BBC would cease to operate the breadth and depth of services that it currently does. While a commercial BBC would likely continue to make content in some PSB genres, there would

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<sup>17</sup> Dr Caitriona Noonan: ‘The Production of Religious Broadcasting: The Case of the BBC’ (2008) p.22

<https://core.ac.uk/download/pdf/40053804.pdf>

<sup>18</sup> Ibid, p.177

be no guarantees as to the scale of investment or output over time; even if the BBC retained PSB status under a commercial model, policy makers would have a significantly reduced ability to compel the production of content in PSB genres... and **funding for marginal genres (e.g., religion, specialist factual, speech radio)... would be reduced or removed.**"<sup>19</sup>

- xxxvi. It is generally acknowledged that we are living in a time of increasing political disenfranchisement and hardening cultural divides. When people rarely see themselves, their stories or their values depicted in the media they are offered, their trust in those institutions is eroded. In multifaith Britain, rebuilding trust, requires that all PSBs should include, on air and in their production rooms, the voices and experience of a broader range of contributors, and the respectful engagement and inclusion of people with different religious beliefs.
- xxxvii. We would contend this need is particularly acute in an ecosystem increasingly dominated by less or non-regulated social and online media platforms, where religious stereotypes or misreporting can lead to social unrest or even endanger lives.<sup>20</sup>

*"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.

## Conclusions

- xxxviii. The Sandford St Martin Trust believes this is a critical moment for the future of religious broadcasting in the UK. The rapid evolution of media markets - shaped by the growth of the internet, declining spend and output by public service broadcasters, and market developments, either individually or in combination - have already poorly affected core religious output. And yet at the same time, Ofcom's own research has indicated that there is significant consumer demand for good religious broadcast content.
- xxxix. Any consideration of the future of PSB must begin with a more widespread acknowledgement within the industry that religious and ethical broadcasting must be protected.
- xl. We supported the BBC when it undertook its 2017 internal Religion and Ethics Review and welcomed its conclusions. The Review should have kickstarted an ongoing commitment for people working at all levels of the organisation to step back and examine their prejudices and limitations when it comes to religion and to improve their offering. However we note that, more than three years later, many of the promises made at the time have not been delivered and, following the departure of James Purnell, it is not clear who has an overall editorial overview and responsibility for the BBC's religious and ethical content offering.

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<sup>19</sup> Ibid, *Mediatique* (2020), para 5.66, p 54, *emphasis ours*.

<sup>20</sup> We would refer you to a small selection of recent press articles and research as a snapshot of evidence of the dangerous impact of this trend:

"In India, a Pandemic of Prejudice and Repression": <https://www.nytimes.com/2020/04/21/opinion/coronavirus-india.html>;

"The rightwing Christian preachers in deep denial over Covid-19's danger: <https://www.theguardian.com/us-news/2020/apr/04/america-rightwing-christian-preachers-virus-hoax>;

Muslims in the UK: the viral poster, factchecked: <https://fullfact.org/news/muslims-uk-viral-poster-factchecked/>;

Religion and Fake News: Faith-based Alternative Information Ecosystems in the U.S. and Europe: <http://ciris.org.uk/wp-content/uploads/2018/02/TPNRD-Religion-and-Fake-News.pdf>

- xli. Regardless of the BBC's slowness to follow up on some of its own recommendations, we would urge Ofcom to propose a similar review be adopted by all public service broadcasters and that strategies should be devised to extend this ethos to the wider media.
- xlii. We have long argued that to ignore religion is to leave a gaping silence at the heart of broadcasting. We would contend further that religious broadcasting is a core element of public service broadcasting and that all PSB's should be obliged to provide such coverage and to make good the deficiency as far as possible.