



**The Sandford
St Martin Trust**

Watch This Space

DCMS Public Consultation Response

31 August 2026

Submitted by

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About the Sandford St Martin Trust

- i. The Sandford St Martin Trust (SSMT) promotes thought-provoking, distinctive broadcasting that engages with belief and enhances the public understanding of religion. We believe the media have an increasingly important and challenging role to play in interpreting world events and that this cannot be done without acknowledging the complex roles religions play in both contemporary and historical human experience. Religiously literate media can promote greater understanding, increase tolerance, and foster stronger communities and cooperation at local, national and global levels.
- ii. SSMT advocates at industry, regulatory and government levels for the place of broadcasting about religion in a healthy and diverse media ecosystem. Our outreach work promotes religion as an important and rewarding subject for both content-makers and audiences. In recent years, we have produced events in partnership with the Wales Screen Summit, the Bradford Literature Festival, the Commission for Belief in Public Life, the Edinburgh International Television Festival, the Media Society, NUJ Training, Sheffield Doc/Fest and many more. More details can be found on our website: www.sandfordawards.org.uk
- iii. In addition to our campaigning and advocacy work, SSMT has made annual awards for the best broadcast and, more recently, online video and audio content about belief, religion, ethics and spirituality since 1978. The SSM 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 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 from a list published in that magazine.
- iv. SSMT 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 Trustees include people with many years' experience of production and broadcasting who represent a wide variety of perspectives and faith backgrounds.

Responses to 'Watch This Space: a new strategic direction for UK media - Green Paper and Public Consultation'

Consultation questions

Question 1. The green paper covers topics relating to the future of UK television and media. More specifically, it includes content on:

- the current market and audience context
- prominence of news and of public service media
- future of TV distribution and regulation
- a new system for public service media
- media literacy

What are your overall views on the future of television and media in the UK, related to the topics in this green paper?

The Sandford St Martin Trust believes that the future of UK media should be shaped not simply by technological innovation or commercial competition, but by the public value that media creates. Public Service Media (PSM) remains one of the UK's most important civic institutions, strengthening democracy, social cohesion and informed public debate. As audiences move towards streaming services, online platforms and AI-mediated discovery, the public service principles that have traditionally underpinned broadcasting must be preserved and adapted for the digital age. This includes ensuring that trusted religiously-literate journalism, high-quality UK content and programmes exploring religion, belief and ethics remain visible, discoverable and sustainably commissioned. In an increasingly complex and diverse society, religious literacy is not a niche concern but an essential component of media literacy and democratic citizenship.

Market and audience context

Question 2. Chapter one of the green paper describes a series of challenges impacting the UK's TV production ecosystem, including:

- the spending power of public service media (PSM) providers is decreasing, which impacts their ability to commission new content
- the sector faces rising production costs and inflationary pressure, particularly for high-end content like drama
- PSM providers are adopting 'fewer, bigger and better' commissioning strategies, often prioritising digital-first content, which has resulted in fewer commissions for some genres
- when global streaming platforms commission directly, they typically retain the IP. This inward investment, while filling production expenditure gaps, risks shifting the residual commercial value offshore, creating a challenge for producers to retain IP and long-term economic value
- screen-based businesses report unmet finance demand and feel underfunded, despite a high rate of actively using external finance

What measures do you feel would be most effective for the government to take to overall address these challenges?

The changing economics of television production, and the challenges of audio streaming for radio, present a particular risk to content that delivers high public value but limited commercial return. As PSM providers face declining spending power, rising production costs and increasing competition from global platforms, commissioning has inevitably become more commercially risk-averse and there has been a flattening in the range of new content being commissioned. While the trend towards commissioning fewer, larger productions may be economically rational, it has contributed to a reduction in the breadth and diversity of programming available to UK audiences.

The Sandford St Martin Trust is particularly concerned about the future of programmes exploring religion, belief and ethics. These subjects rarely generate the audiences or international commercial returns associated with high-end drama or entertainment, yet they make an essential contribution to public understanding, democratic participation and social cohesion. In an increasingly diverse society, we believe that programming that helps audiences understand different beliefs, values, world perspectives and lived experiences should be recognised as part of the UK's civic infrastructure rather than simply another market category. We note that Ofcom has a statutory duty to promote media literacy. We urge that religious literacy is no less crucial in a fractured age

Government policy should therefore recognise that the value of media cannot be measured solely by its commercial performance. PSM exists because some forms of content deliver significant public benefit while being unlikely to attract sufficient commercial investment. The long-term sustainability of these genres should be regarded as a core objective of media policy.

The Government should therefore consider measures that:

- strengthen the commissioning capacity of public service media organisations, enabling them to continue investing across the full range of public service genres rather than concentrating resources in a narrowing number of commercially attractive formats;
- ensure that public service obligations continue to include an appropriate breadth of genres, including programming that promotes understanding of religion, belief, ethics, culture and civic life;
- support independent producers to retain intellectual property wherever possible, recognising that ownership of IP underpins the long-term sustainability of the UK's independent production sector and its capacity to continue producing distinctive UK content which represents the UK's diverse faith communities;
- recognise that discoverability has become as important as commissioning. As audiences increasingly consume television through streaming platforms and algorithmic recommendation systems, content of high public value can become effectively invisible if it is not prominently featured. Public service content should therefore remain easy to find, regardless of how audiences access radio or television.

Ofcom's monitoring of public service broadcasting has evidenced a long-term decline in the volume of programming dedicated to religion and belief across the UK's public service media providers. The University of Leeds' Behind the Screen research, conducted in partnership with the Sandford St Martin Trust, demonstrated that this challenge is now compounded by changes in the digital media environment: even when public service content about religion is commissioned, it is less visible and less discoverable within platform-led and algorithmically curated services. Together, these findings suggest that content with high civic value but limited commercial appeal is increasingly vulnerable both in commissioning and in distribution. Programmes that foster religious literacy and deepen public understanding of complex social issues play an essential role in promoting social cohesion, informed public debate and understanding between communities, yet, without specific protections, they are unlikely to be adequately sustained by market forces alone. The Government should therefore ensure that the transition to a more digital, platform-led media ecosystem does not diminish either the provision or the discoverability of public service content, particularly genres whose primary contribution is civic, cultural and democratic rather than commercial.

Ultimately, the success of the UK's media system should be judged not only by the volume of production or inward investment it attracts, but by whether it continues to provide trusted journalism, reflects the diversity of UK society, promotes informed public debate, enables audiences to understand one another and enhances community cohesion.

Prominence of news on social media

Question 3. How often do you encounter news you feel is untrustworthy when online (for example, something you consider to be misinformation)?

Options:

- Never
- Rarely
- Sometimes
- Often
- Very often
- Not sure

Question 4. Do you believe 'trustworthy' news content should be more visible on social media?

Options:

- Yes
- No
- Not sure

Question 4a. How would you like this to look in practice, so that audiences can access trustworthy news more easily on social media?

Trustworthy content should not rely solely on individual users' ability to distinguish between authoritative journalism and misinformation. The design of digital platforms should actively support users in finding reliable, evidence-based information while preserving freedom of expression and plurality of viewpoints.

Government should work with Ofcom, PSM providers and technology companies to encourage greater algorithmic prominence for verified public service media and other trusted news providers, particularly during moments of public importance.

This should be supported by transparent source labelling, independent third-party fact-checking, and clear information about why particular content has been recommended to users. Platforms should also provide visible, easy-to-use settings that allow users to prioritise trusted sources in their feeds, alongside safe, age-appropriate portals that help children and young people navigate online information environments with confidence.

Further, the Sandford St Martin Trust believes that the discussion should move beyond making individual pieces of content more prominent to considering how trusted institutions can help citizens navigate an increasingly fragmented media landscape.

We therefore support the proposition advanced by the Children's Media Foundation (reference: https://www.thechildrensmediafoundation.org/wp-content/uploads/2026/03/CMF-bbc_charter_response-final.pdf) that the BBC's future role should shift from its current focus on

‘output’ to focus instead on ‘outcome’, essentially evolving from being judged primarily by the quantity of content it produces, to the public outcomes it enables. This would involve reframing the BBC as a trusted "Civic Concierge". Under this model, the BBC would not simply produce and distribute its own content, but would act as a trusted curator and guide, helping audiences navigate the wider information ecosystem by signposting authoritative BBC and non-BBC sources, convening informed public conversation, and modelling the editorial standards of accuracy, impartiality and accountability that are increasingly absent from commercially optimised digital platforms.

This approach is particularly relevant for subjects such as religion, belief and ethics, where misinformation, stereotyping and polarisation can have profound social consequences. A trusted public service institution that helps audiences discover authoritative journalism, educational resources and high-quality factual content from a range of providers would strengthen media literacy, promote religious literacy, and support informed democratic participation without restricting access to alternative viewpoints.

Ultimately, the objective should not be to create a hierarchy of approved content, but to ensure that trustworthy, independently-regulated public interest journalism and programming are easier to find, easier to recognise and easier to choose within an increasingly algorithmically mediated media environment.

Question 5. If the government gives prominence to trustworthy providers of news (meaning by making them more visible online), should this prominence be ongoing, and ‘always on,’ or only active during periods of crisis?

Options:

- Ongoing and ‘always on’
- Only during periods of heightened vulnerability
- Not sure

Question 6. Do you feel individual users should be given an option in whether prominence measures for trustworthy news content are switched on or off for them?

Options:

- Yes - users should be given an option in whether prominence measures are switched on or off for them
- No - users should not be given an option in whether prominence measures are switched on or off for them
- Not sure

Media literacy duty and joint venture

Question 7. How concerned, if at all, are you about the impact of misleading or unreliable information on society?

Options:

- Very concerned
- Somewhat concerned
- Not very concerned
- Not at all concerned
- Not sure

Question 8. How concerned, if at all, are you about the impact of misleading or unreliable information on democracy?

Options:

- Very concerned
- Somewhat concerned
- Not very concerned
- Not at all concerned
- Not sure

Question 9. Public service media refers to organisations such as the BBC, ITV, Channel 4 and S4C.

Which of the following statements most closely reflects your view on the role of public service media in helping people critically engage with news and other information they encounter online or offline? (select only one)

Options:

- Public service media has a role in supporting critical engagement, and is currently doing enough
- Public service media has a role in supporting critical engagement, and should do more
- Public service media does not have a role in supporting critical engagement
- Public service media is currently doing too much to support critical engagement, and should do less
- Not sure

Question 10. How important, if at all, do you think it is for people to be able to judge the accuracy and reliability of information they encounter, for example online or in the news?

Options:

- Very important

- Somewhat important
- Not very important
- Not at all important
- Not sure

Question 11. How valuable, if at all, do you believe collaboration between public service media, civil society organisations (for example charities and education groups), and the media sector could be in supporting people to critically assess information?

Options:

- Very valuable
- Somewhat valuable
- Not very valuable
- Not at all valuable
- Not sure

Question 12. Which of the following models, if any, do you consider most effective for further media sector collaboration in this area?

Options: (select all that apply)

- Informal coordination and sharing of learning
- A structured forum with agreed objectives and reporting
- Joint delivery of public-facing initiatives
- No additional collaboration is needed
- Not sure

Question 12a. Please provide any supporting evidence as to why you think the model(s) you selected are effective for collaboration between public service media and the media sector.

Sandford St Martin believes that collaboration between public service media, civil society organisations, faith communities and the wider media sector has a vital role to play in helping people critically assess information in an increasingly complex digital environment. No single institution can equip audiences with all the knowledge and skills needed to navigate a fragmented media landscape characterised by algorithmic recommendation, AI-generated content and misinformation. Effective media literacy therefore requires collaboration between organisations with complementary expertise.

Critical assessment is about far more than identifying misinformation or verifying facts. It also requires audiences to understand context, recognise editorial standards, distinguish between reporting and opinion, appreciate how algorithms shape the information they encounter, and develop the confidence to engage with complex and contested issues. Public service media providers, educational institutions, civil society organisations and faith communities each bring different strengths to this task.

As a charity dedicated to promoting religious literacy through broadcasting, the Sandford St Martin Trust has seen first-hand how collaboration strengthens public understanding. Through initiatives such as the Public Service Media Forum, the *Behind the Screen* research project, partnerships with universities and other charities, and our programme of public events and media salons, we have demonstrated the value of bringing together broadcasters, academics, civil society organisations and subject specialists to address shared challenges. These collaborations have generated research, informed public debate and strengthened understanding of the role that high-quality public service media plays in a democratic society.

Civil society organisations can make a distinctive contribution by providing specialist expertise that complements, without compromising, editorial independence. In areas such as religion and belief, subject knowledge is essential if audiences are to critically assess media and understand the wider context in which stories develop. Media literacy and religious literacy should therefore be seen as complementary and equally crucial for the restoration of a balance society. Audiences cannot fully evaluate reporting about religion, belief or identity if they lack a basic understanding of the beliefs, traditions and social contexts that underpin many contemporary national and international events.

Government should therefore encourage and support partnerships between public service media organisations, universities, schools, charities and community organisations that strengthen public understanding, share expertise and promote high editorial standards. Such partnerships should be independently led within safe civic spaces, respect editorial autonomy and focus on improving citizens' ability to engage critically with information rather than promoting particular viewpoints.

Ultimately, the objective should not simply be to help people identify false information, but to equip them to become informed, questioning and confident participants in democratic life. Collaboration between trusted public institutions and civil society will be essential if the UK is to build a media environment that is not only resilient to misinformation, but also capable of fostering understanding, trust and social cohesion.

Future of TV distribution

Question 13. Chapter 3.1 of the green paper outlines the government's preference for an IPTV transition from either 2034 or 2044. The following questions seek views and evidence relating to this proposal.

To what extent do you agree or disagree with the government's assessment of the case for change relating to the future of digital terrestrial television?

- Strongly agree - audiences should definitely adopt Internet Protocol Television (IPTV) and similar technologies
- Agree - audiences should adopt IPTV and similar technologies
- Neither agree nor disagree - no strong opinion either way
- Disagree - audiences should not adopt IPTV and similar technologies
- Strongly disagree - audiences should definitely not adopt IPTV and similar technologies
- Not sure

Question 13a. Please provide further rationale for your answer and any relevant evidence.

The Sandford St Martin Trust agrees that changing patterns of media consumption require the government to consider the long-term future of digital terrestrial television and radio. However, we believe the central issue is not the future of a particular transmission technology but the preservation of the public service principles that digital terrestrial television and radio has traditionally supported: universal access, free availability, prominence for public service content and trusted sources of news and information. Any transition to internet-delivered television or radio should maintain these principles and should not disadvantage audiences who continue to rely on free-to-air services. As television and audio become increasingly platform-based, the government should place equal emphasis on the discoverability and prominence of public service content, ensuring that content of high civic or public service value remains easy to find regardless of how audiences access it.

Question 14. The green paper outlines two timing options for digital terrestrial television (DTT) switch-off. These are 31 December 2034 (option 1 at Annex A) and 31 December 2044 (option 2 at Annex A).

Which option do you prefer as timing for DTT switch-off?

Options:

- Strongly prefer 2034
- Somewhat prefer 2034
- No strong opinion either way
- Somewhat prefer 2044
- Strongly prefer 2044
- Neither 2034 or 2044
- Not sure

Question 14a. Please provide further rationale for your answer and any relevant evidence.

Any transition to internet-delivered television or retreat from analogue radio transmissions should not be scheduled until regulation is in place to ensure that content of high civic or public service value and trusted sources of news and information are universally accessible, freely available and prominent and easy to find across IPTV and its audio equivalent

Question 15. Do you have evidence that another timeframe is preferable to the ones specified in this consultation? If so, please provide further details.

Question 15a. For industry/organisations only:

To deliver an IPTV transition would require collaborative working with audience groups, industry and across government. Please outline your organisation's commitment to supporting this work, including relevant experience, resources, and innovative solutions as to how you would deliver this transition.

Question 16. To what extent do you agree or disagree that the challenges identified in the green paper (delivering for all audiences; maintaining a reliable television service; promoting competition and innovation in the television industry and supporting a sustainable future for PSM providers) capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies?

- Strongly agree - the challenges comprehensively capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies
- Agree - the challenges capture all of the considerations
- Neither agree nor disagree - no strong opinion either way
- Disagree - the challenges do not capture all of the considerations
- Strongly disagree - the challenges definitely do not capture all of the considerations
- Not sure

Question 16a. Please provide further rationale for your answer.

The Sandford St Martin Trust agrees that the challenges identified in the Green Paper are important considerations in planning the transition from Digital Terrestrial Television (DTT) to IPTV and other internet-delivered services. However, we do not believe they capture the full range of issues that should inform such a significant change in the UK's media landscape, and they are notably silent about radio where audiences are holding up remarkably well in the digital environment.

This green paper focuses primarily on the technical, commercial and consumer dimensions of the transition from DTT to IPTV: maintaining reliable services, supporting innovation, enabling competition and ensuring the sustainability of public service media providers. While these are all important objectives, they do not sufficiently address the impact that changes in distribution may have on the quality, breadth, visibility and long-term sustainability of public service content itself.

From the Sandford St Martin Trust's perspective, the transition to IPTV and exclusively to digital radio should not be judged solely on whether audiences can continue to access television or radio services through new technologies, but on whether the distinctive purposes of public service media are preserved and strengthened. Public service broadcasting exists because the market alone does not consistently provide content that delivers significant civic, cultural and democratic value. Genres such as religion and belief, arts, education and specialist factual programming often have limited commercial appeal but play an essential role in helping audiences understand the society in which they live. If the transition to IPTV and the abandonment of analogue radio accelerates commercial pressures that further reduce investment in these genres or makes them harder for audiences to discover within algorithmically curated platforms, the public interest will not have been well served.

The University of Leeds' *Behind the Screen* research highlighted that the challenge is no longer simply whether public service content is commissioned, but whether it remains visible and discoverable once it reaches digital platforms. In an increasingly platform-led media environment, content of high public value but limited commercial appeal risks becoming marginalised both in commissioning decisions and through algorithmic recommendation systems that prioritise engagement over public value.

We therefore believe that any assessment of the transition to IPTV and the closing down of analogue radio transmissions should include explicit consideration of its impact on the diversity of public service genres like religion, the discoverability and prominence of trusted public service content, and the ability of audiences to access programming that supports greater democratic participation, cultural understanding and social cohesion. The success of this transition should ultimately be measured by whether the UK's media ecosystem continues to fulfil the civic values and public purposes that have long distinguished public service media.

Question 17. In your opinion, which, if any, of the challenges are most important to you? Please rank in order of importance, where 1 is the most important to you.

Options:

- Supporting a sustainable future for public service media providers - public service media providers play a central role in the UK's cultural, civic, and democratic life. Industry must ensure that new distribution models support, rather than undermine, public service media providers' ability to play this role.
- Delivering for all audiences - Any transition to IPTV and other similar technologies must preserve universal access to TV, including public service media providers, regardless of income, location, age, or digital confidence.
- Maintaining a reliable television service - The ability to communicate to the public in a national emergency must be retained beyond a move to IPTV. Before digital terrestrial television is switched off, industry must show that alternative technologies can deliver comparable or better standards of reliability, resilience, and coverage.
- Promoting competition and innovation in the TV industry - A managed transition to IPTV and other similar technologies offers an opportunity to modernise TV delivery, the

transition should free up resources and spectrum, and allow broadcasters to focus on content and innovation rather than maintaining parallel legacy systems.

Question 18. In the event of an IPTV transition, which of the following, if any, do you think are the most important to ensure everyone can still access television from their own home? Please rank in order of importance, where 1 is the most important to you.

Options:

- Affordable broadband for all, suitable for television viewing
- Low-cost or subsidised broadband for people receiving benefits or on low incomes
- Low-cost or discounted internet capable television sets for people on low incomes
- Simple devices that connect older television sets to the internet with no ongoing fees
- Services and systems that feel the same as digital terrestrial television so they are easy to use for people with limited digital skills
- Built-in, easy to use accessibility features for disabled users, for example subtitles and audio description
- Digital skills required to navigate or set up IPTV

Question 19. What are the likely environmental impacts associated with both a 2034 transition and 2044 DTT switch-off (transition to IPTV)?

In your response, please provide evidence where possible on:

- The comparative energy use and carbon emissions of different distribution technologies.
- The environmental implications of changes in viewing behaviour (for example, increased streaming or on-demand consumption)
- The lifecycle environmental impacts of relevant infrastructure and consumer equipment (such as transmitters, network infrastructure, set-top boxes, and connected televisions)
- Opportunities to improve the environmental sustainability of television distribution, including through technological innovation, infrastructure efficiency, or consumer behaviour
- Any risks that policy decisions on the future of TV distribution could unintentionally increase environmental impacts

Please include any available data, modelling, or research that could inform the government's assessment of environmental impacts.

Question 20. Is there anything else you would like to add regarding the future of TV distribution that has not already been captured?

Future of TV regulation

Question 21. Chapter 3.2 of the green paper sets out some of the challenges regarding the future of TV regulation, such as which TV-like services should be regulated going forward, and to what standard. Is there any information or comment you would like to provide in relation to the future of TV regulation?

Prominence of PSM content in the platform age

Question 22. How easy or difficult is it for you to find culturally relevant content on video platforms, including video sharing platforms like YouTube and TikTok and streaming platforms like Netflix and Amazon Prime Video?

Examples of culturally relevant content could include stories set in Britain, with British presenters, representing British values or referencing British events or customs.

Options:

- Very easy - I have no issues in finding culturally relevant content on these platforms
- Somewhat easy - I have very few issues in finding culturally relevant content on these platforms
- Neither easy nor difficult - no opinion either way
- Somewhat difficult - I have some issues in finding culturally relevant content on these platforms
- Very difficult - I have a lot of issues in finding culturally relevant content on these platforms
- Not sure

Question 23. Prominence can be defined as giving certain content a privileged position, for example, ensuring a specific channel appears at the top of search results or features on a recommendation feed, within a user interface so it is particularly easy for audiences to find and watch.

To what extent do you agree or disagree that content from public service media providers (like the BBC and Channel 4) should be easier to find on video platforms?

Options:

- Strongly agree - it should definitely be easier to find Public Service Media content on these platforms
- Agree - it should probably be easier to find public service media content on these platforms
- Neither agree nor disagree - no opinion either way
- Disagree - it should probably not be easier to find public service media content on these platforms

- Strongly disagree - it should definitely not be easier to find public service media content on these platforms
- Not sure

Question 23a. What do you see as the benefits of content from public service media providers (like the BBC and Channel 4) being easier to find on video platforms?

The principal benefit of making content from public service media providers easier to find is that it enables public service media to fulfil its distinctive public purposes.

In an increasingly fragmented and algorithmically mediated media environment, discoverability has become as important as commissioning. If audiences cannot easily find public service content, its civic value is diminished regardless of its quality.

This is particularly important for genres that deliver significant public benefit but have limited commercial appeal, including religion and belief but also arts, education and specialist factual programming. The University of Leeds' *Behind the Screen* research highlighted the growing risk around the lack of visibility for such content even when it had been commissioned. Improving the prominence of trusted public service media would help ensure that audiences continue to encounter content that promotes understanding, challenges assumptions and reflects the diversity of UK society.

Making public service content easier to find would also strengthen informed democratic participation by increasing access to journalism and factual programming produced under robust editorial standards of accuracy, impartiality and accountability. Unlike commercial recommendation systems, which are primarily designed to maximise engagement, public service media exists to serve the public interest. Measures to improve the discoverability of public service content should therefore be understood not as preferential treatment for particular broadcasters, but as a means of preserving the civic, cultural and democratic value that public service media contributes to UK society.

Question 23b. What types of content from public service media providers do you think should be easier to find on video platforms? (select all that apply)

Options:

- Arts and classical music
- Children's
- Comedy
- Drama
- Education
- Entertainment
- Factual entertainment
- Feature films
- General factual

- News and current affairs
- Religion and ethics
- Soaps
- Specialist factual
- Sports
- None of the above
- Other (please specify)

Question 23c. On which video platforms do you think content from public service media providers should be easier to find?

Content from public service media providers should be easier to find wherever audiences access professionally produced video content.

From the Sandford St Martin Trust's perspective, prominence should not be confined to particular commercial platforms but should apply across the digital media ecosystem wherever recommendation systems, search functions or user interfaces influence what audiences are likely to discover. This is particularly important for 'non-commercial' content with high civic value including programmes exploring religion, belief and ethics, which may otherwise become increasingly difficult to find.

The objective should be to ensure that audiences can readily access trusted public service content wherever they choose, rather than requiring audiences to seek it out on specific services or platforms.

Question 24. Do you regularly create video content and upload it to video sharing platforms, such as YouTube and TikTok?

Options:

- Yes, primarily for fun or as a hobby
- Yes, primarily for professional purposes or to generate income
- No
- Prefer not to say

Question 24a. As a content creator or someone who uploads content to video sharing platforms, are there additional changes or features that you would want video sharing platforms to offer? For example to increase the visibility of your content, transparency of systems or to make content more discoverable.

Question 24b. Thinking about the video sharing platforms you upload and share content on, do you have sufficient awareness of how content is shown to viewers through the algorithms?

Options:

- I have sufficient awareness of how the algorithm works
- I do not have sufficient awareness of how the algorithm works
- Not sure

A new system of public service media for television

Question 25. Which of the following, if any, attributes of public service media content do you value the most? Please select (up to) your top three.

Options:

- Diverse programming - content that features people like me, and people from different backgrounds
- Quality news - news content that is accurate, and helps me better understand what is going on in the world today
- Regional coverage - programming or content that keeps me informed about my area
- Quality content (non-news) - programmes or content that you see as high-quality and or different in their approach to what is offered by other providers
- Range - the availability of a range of different types of programmes (for example drama, comedy, entertainment, sport)
- Tailored to UK audiences - programmes that are specifically made for UK audiences, and are relevant to me
- Shared viewing opportunities - programmes and broadcast events that I can watch and talk about with others, for example family or my peers
- National cohesion - the broadcasting of events that bring the nation together for a shared viewing experience
- None of the above
- Not sure

Question 26. Chapter 4.2 of the green paper outlines the challenges public service media faces and how the system tied to broadcast licences is relatively inflexible. The chapter suggests this limits the options for benefits and obligations Ofcom can place on public service media providers, and makes it harder to open up the system to new providers. It is argued this risks the sustainability of the system as audiences move away from live broadcast TV to switch between linear, on-demand, and user-generated content on multiple devices.

To what extent do you agree or disagree with the suggestion that the public service media system needs to be reformed away from the current model that uses broadcast licences?

Options:

- Strongly agree - the system definitely needs to be reformed away from using broadcast licences
- Agree - I agree that the system may need to be reformed away from using broadcast licences
- Neither agree nor disagree - No opinion either way
- Disagree - I do not agree that the system necessarily needs to be reformed away from using broadcast licences

- Strongly disagree - I feel strongly that the system should continue to use broadcast licences
- Not sure

Question 26a. Please provide a reason and any supporting evidence for your view.

The Sandford St Martin Trust believes the principal question should not be whether broadcast licences remain the best regulatory mechanism, but whether any new framework is better able to deliver the public purposes that have historically underpinned public service media. The value of the current system lies not in broadcast licences themselves, but in the public service obligations they have secured: trusted journalism, universal access, editorial accountability, and a breadth of programming that reflects the diversity of the UK's cultures, communities, beliefs and experiences.

The Sandford St Martin Trust is concerned that this green paper places considerable emphasis on how content is delivered, but comparatively little on the impact that regulatory reform may have on the range, quality, prominence and discoverability of public service content. As audiences increasingly consume content through platform-led environments, public service media will increasingly compete within commercially-incentivised recommendation systems that prioritise engagement rather than public value. Any reform of the model based on broadcast licences should therefore focus not on who can become a public service media provider, but on how public service content will continue to be commissioned, discovered and valued in digital environments.

Any new framework should ensure that public service obligations follow audiences rather than technologies. In particular, the government should safeguard the breadth of public service genres, including religion and belief, arts, education and specialist factual programming, which make an important contribution to democratic participation, cultural understanding and social cohesion despite often having limited commercial appeal. The success of any new regulatory model should ultimately be judged by whether it preserves and strengthens these public outcomes, rather than simply modernising the means by which content is distributed.

Question 27. The green paper outlines four potential principles of the public service media system.

In brief, these are:

- Universality: to ensure that public service content remains universally available, free of charge, reflecting audience behaviours and media consumption habits.
- Public service content: to ensure provision of a wide range of high-quality, distinctive public service content.
- Systemic sustainability: to ensure the system of public service media has a mix of providers to increase its resilience to deliver public service media objectives in the long-term. It should also be sufficiently flexible to the potential shifts of the current collection

of PSM providers and be open to opportunities of mergers, partnerships, and definitions of public service content.

- A sustainable PSM compact: to ensure the benefits PSM providers receive are proportionate to the obligations they must deliver for PSM status so as to be attractive and commercially sustainable.

To what extent do you agree or disagree that each of the following should be considered by government as principles of the public service media system?

- Universality
 - o Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure
- Public service media content
 - o Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure
- Systemic sustainability
 - o Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure
- A sustainable public service media compact
 - o Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure

Question 28. The green paper outlines three illustrative models for our public service media system to align with our proposed principles. These models are outlined below, and a more detailed description on each is presented in chapter 4 of the green paper.

- A model focused on PSM institutions would see institutions, such as broadcasters or streamers, designated as PSM institutions.
- A model focused on PSM services would allow specific ‘services’ to receive PSM designation if they were to meet agreed requirements. In this context, ‘services’ could range from linear provision, such as an arts-focused TV channel, a high-quality VoD service, or channels on video sharing platforms, such as a history or documentary channel on YouTube.
- A content-centric approach would determine whether something is public service content subject to an agreed definition (which could evolve in line with cultural/societal needs) rather than a particular provider (institution or service).

Please rank, in order, your preferred model of the public service media system, where 1 is your most preferred model:

Options:

- 1. A combination of the models
- 2. A model focused on PSM institutions
- 3. A model focused on PSM services

- 4. A content centric approach

Question 29. Do you have any further comments you would like to add on the content covered by this chapter, or any further information that will aid us in interpreting your responses?

Our ranking of preferred models in response to question 28 reflects the broader principle running throughout the Sandford St Martin Trust's response to this consultation: the future public service media system should be judged by the public value it delivers, rather than by the technologies or organisational structures through which content is distributed.

The Sandford St Martin Trust believes that public service media is more than the sum of individual programmes. It is an ecosystem comprising trusted institutions, high editorial standards, specialist commissioners, sustained investment in public service genres, and platforms and services that enable audiences to discover civically valuable content and thus safeguards the health of civil society. While technology and audience behaviour will continue to evolve, these functions are essential if public service media is to fulfil its democratic, cultural and civic purposes.

For this reason, we support a model that combines the strengths of existing public service institutions with the flexibility to recognise new services that are able and willing to meet clearly defined public service obligations. Public service obligations should follow audiences and their needs as viewing habits change, but they should not be detached from the institutional capacity needed to commission, curate, promote and sustain content of enduring public value.

We are more cautious about a purely content-centric approach. While recognising the importance of high-quality public service content wherever it is found, we do not believe that individual programmes alone can sustain a healthy public service media ecology. Content of public value depends upon organisations that invest in editorial expertise, develop specialist knowledge, commission a broad range of genres, and maintain long-term relationships with audiences. Without those institutional foundations, there is a risk that public service media becomes fragmented into isolated pieces of content, with less capacity to support genres that are of high civic value but limited commercial appeal.

This is particularly relevant for genres such as religion and belief. As the *Behind the Screen* research has demonstrated, these genres already face growing challenges in both commissioning and discoverability within increasingly platform-led media environments. Future reform should therefore strengthen - not weaken - the institutional and regulatory framework that enables such content to be commissioned, promoted and found by audiences.

Ultimately, the Sandford St Martin Trust believes the success of any future public service media framework should be judged not by the number or type of designated providers, services or programmes, but by whether it continues to secure trusted journalism, a diversity of public service genres, informed democratic participation, cultural understanding and universal access to content of enduring civic value.