



**About Premier Christian Media:**

Premier Christian Media Trust is a registered charity which operates a range of magazine titles and online resources for the Christian community in the UK as well as Premier Christian Radio which broadcasts nationally on the DAB network. Every week, almost 3 million people tune in to Premier Radio, Premier Praise and Premier Gospel for inspiring Christian content.

**Terms of Reference:**

We are responding to the Small Screen: Big Debate consultation. Your review “The Future of Public Service Media” looks at “how to maintain and strengthen public service broadcasting across the next decade and beyond.”

In your consultation document, you set out reasons why PSB is important and you, rightly, explain that:

*Some types of programming rely heavily on the contribution made by public service broadcasters. .... There is (also) only **limited provision** of UK children’s programmes, arts, formal education, **religion** and ethics from other broadcasters.*

Schedule 2 of the BBC Agreement identifies Religious programming as “At Risk” – a genre that is under-provided or in decline. Data received by Ofcom showed that there was no original UK content spend in religious programming in 2018 other than the BBC’s. We have not seen any figures for 2019 and 2020.

**Our Response**

We would like to respond directly to Question 5: “What options do you think we should consider on the terms of PSM availability?”

Question	Your response
<p><b>Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries’ approaches?</b></p>	<p>Firstly, we believe that the PSM policy regime should be updated to safeguard access to “at risk” religious content for dedicated communities of interest beyond the reach of the BBC.</p> <p>Public service religious media content should be made available more readily to dedicated community-of-interest audiences.</p> <p>Secondly, any request Ofcom makes for PSM content to be made more widely available online and via video-on-demand should also include DAB radio.</p> <p>The BBC’s Distribution Policy should also be clearer about DAB radio rights of access to BBC content.</p> <p>Thirdly, we would like to see a more formal arrangement on religious content accessibility between the BBC and dedicated broadcasters such as ourselves.</p> <p>Ofcom guidance on the Distribution of BBC Public Services says “the BBC must offer the public services to third parties in response to reasonable requests for supply, except where the BBC has an objective</p>

*justification for not doing so. In offering the public services for supply, and in supplying those services, the BBC must act on a fair, reasonable and non-discriminatory basis."* However, decisions continue to be made on a case-by-case basis and we would benefit from a more transparent and formal footing.

Our proposals would be in line with existing Ofcom requirements but at the same time an improvement on current practice:

At Premier, we believe that a Christian audience would benefit from the re-broadcast of religious programming which is too often shelved after only one broadcast on the BBC networks.

The issue has gained a new urgency because of the pandemic. The informal and informative discussions we have with our loyal listeners have been a tonic to people who have found the solitude of lockdown particularly difficult. The lockdown has shut churches and places of worship and there is a significant appetite for more religious output over our airwaves as a result.

We believe that charitable, not-for-profit radio stations such as ours can part of the solution to the dearth of availability of original content, whether the content is something we produce ourselves or source from the BBC. However, we do not have the production budgets available to the BBC for making new original content and so we would rely on access to BBC content and on a willingness by the BBC to share content.

Religious content should be made more accessible particularly where it is not routinely sold on international markets or regularly repeated domestically. Premier Christian Media can help the BBC reach dedicated audiences beyond its own networks meaning that the social return on investment of each piece of content is amplified.