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THE CHURCH OF ENGLAND

ARCHBISHOPS' COUNCIL

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BBC Charter Review Consultation
Department for Culture Media and Sport
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William Fittall
Secretary General

27 April 2006

I enclose the Church of England's response to the BBC Charter Renewal White Paper consultation. I am happy for this to be published on your website.

I have also sent a copy of the submission and of this letter by e-mail.

William Fittall

The Church of England Response to the BBC Charter Renewal White Paper

Introduction

1. The Church of England welcomes the White Paper and its accompanying draft Charter and Agreement. We commend the proposal to bring licence-fee payers' wishes to bear more fully on BBC decision-making. We also welcome the emphasis on creating a strong BBC for the digital age. This is vital if the BBC is to retain its pre-eminence and capacity to provide public service broadcasting for the common good. We acknowledge the significant consultation process to which we have contributed at each stage. This response sets out some continuing concerns.

Key issues

2. **Christian churches and other faith communities play a key role in our national and international life. The BBC needs to depict this contribution fairly across its output, including by recognising the role religion plays in world affairs and reflecting this in news, current affairs, documentary and drama.**

We are concerned that the coverage of religion and other beliefs is barely mentioned in the White Paper and only in passing in the draft Agreement.

3. **If the Government contends that these issues cannot be addressed until the BBC Trust has consulted on them, it leaves many questions unanswered about the new purpose remits and service licences. This is too significant an area to be left to chance**
4. **It is unclear where religion or some other programme types fit into the BBC's new purposes proposed in the White Paper. Many observers may conclude that they are being sidelined or, equally of concern, could be excluded at some future date.**

Our concerns

5. The Church of England welcomes the Government's objective of a strong and independent BBC. To be strong, the BBC must have a clear and widely accepted purpose. The White Paper calls the BBC 'A public service for all.' The BBC's own definition of its purpose is 'to bring public benefit to the nation as a whole.' That is both clear and already widely accepted and flows from the public nature of the BBC's funding from a universal licence fee. Yet its translation into the six new purposes for the BBC set out in the White Paper raises questions about how these purposes are expressed.
6. As it is, the Agreement only refers to the BBC having 'regard to the importance of reflecting different religious and other beliefs,' under the purpose: 'Representing Nations and Regions.'¹ Important and valuable though this is, it only provides part of the picture of where religion ought to be embraced in the BBC's output.

¹ Draft Agreement s10 (2)(a)

7. In evidence to the House of Lords' Select Committee on the BBC Charter, the Bishop of Southwark, leading a panel of senior members of faith communities, said: "*For very many people in this country and around the world religion matters immensely and it is the responsibility of the public service broadcasting service to reflect the world as it is. In the world as it is, religion is something very significant.*"²
8. In the United Kingdom, this is demonstrated by the following statistics. Leaving aside the significant number attending other denominations' worship, more people attend a Church of England service on an average Sunday³ than make up the combined membership of all the major political parties⁴. The BBC's own 'Faith Day' poll demonstrated that more than a quarter of the United Kingdom population worships once a month or more⁵. A poll for the Church of England shows that 43% of the nation's population attend a Christmas service⁶ and that a significant proportion of those who do not identify with any belief say their community would be poorer if the Church was not there⁷. These statistics stand alongside the 2001 census finding that four out of five people in the UK population have a faith.⁸
9. The assumption of a previous generation that religion and modernity did not go together is no longer sustainable. Religion has become a much more significant and potent force in world affairs and politics than it was thirty years ago. There is a mixture of reasons for this, some good and some bad. The collapse of Soviet Communism, partly the result of religion at its best, removed institutional atheism from Eastern Europe. Few predicted the destruction of apartheid in South Africa without massive violence, but Christian leadership paid a significant part in that transition. On the other hand the Taliban and al-Qaeda are examples of unwelcome extreme fundamentalism. It is also true to say that some manifestations of Christian fundamentalism provide less happy examples of powerful forces that are religiously motivated.
10. Yet the White Paper has a much less developed expression of where religion should be found in the output of a public service broadcaster⁹ than the Communications Act 2003. We argued in our submission on the Green Paper that s 264(6)¹⁰ of the Communications Act should be paralleled in the Charter and Agreement. We regret that the White Paper does not achieve this.
11. In a BBC Governors' Seminar on religion in 2005, Director-General Mark Thompson said: "In the past religious programming has been associated with duty and caution rather than energy and life. In broadcasting, religion and faith is not just a genre.

² House of Lords' BBC Charter Select Committee 2nd Report, vol II
<http://www.publications.parliament.uk/pa/ld200506/ldselect/ldbbc/128/128ii.pdf>

³ Average Sunday attendance 1,010,000.

⁴ What the parties Claim, 'The Guardian, Monday 12 April 2004
<http://www.guardian.co.uk/guardianpolitics/story/0,1190230,00.html>

⁵ http://news.bbc.co.uk/1/shared/bsp/hi/pdfs/14_11_05_bbc_faith.pdf

⁶ <http://www.cofe.anglican.org/news/pr0506.html>

⁷ <http://www.cofe.anglican.org/news/pr1506.html>

⁸ Census, April 2001, Office for National Statistics <http://www.statistics.gov.uk/STATBASE/Expodata/Spreadsheets/D6590.xls>

⁹ Communications Act 2003 s 264(6)(g)

¹⁰ <http://www.opsi.gov.uk/acts/acts2003/30021--i.htm#264>

Instead issues of belief and non-belief inspire programme-makers from many genres¹¹.” This is not reflected in the White Paper.

12. **We are concerned that the treatment of religion under the BBC’s new purposes, far from indicating the centrality of religion and other belief in the life of much of the population, makes it appear more like a diverting hobby for a minority. In the evidence given by senior members of faith communities to the Select Committee, the Bishop of Southwark advocated stronger provisions in the Agreement explicitly supporting the “full acknowledgement the religious dimension of national and international life across BBC output.”**
13. **Indeed, pointing out one of the dangers of leaving out this acknowledgment, the bishop said: “*We do not want things just to be left to the good will of the director-general. We feel that there should be a formal public service commitment which includes fair reflection of religion and other matters; we actually want that built in to a statement accompanying the charter.*” We reinforce his viewpoint in this submission.**
14. The Lords’ Select Committee’s Second Report reflected many of the views of the bishop and his multi-faith panel in its recommendations.¹² In particular the Select Committee called for a duty within the Agreement for the “**objective portrayal of different beliefs, practices and forms of worship.**”
15. **The Select Committee made other recommendations about religion (Chapter 8 of its Second Report)¹³, which we wholly endorse.**
16. **The BBC’s new purposes in the White Paper do not acknowledge the part played by religion in shaping world events and affairs.** As the Bishop of Southwark also said in evidence to the Lords’ Select Committee: “*I do not believe you can understand much of what is going on around the world in terms of hard news today without having some understanding of religion. When you try to understand, for example, what is going on in Iraq, without some depth of understanding of religion, one can make some grave errors. If it is the responsibility of the BBC, as it certainly is as a public service broadcaster, to try to report the news and explain the figures, I do not believe you can do that without a religious perspective¹⁴.*”
17. We believe that news and current affairs output ought to provide the background necessary to understand the context of its stories. Increasingly this calls for expert knowledge of religion and faith communities in the United Kingdom and overseas. The BBC must enable Britons to clearly understand each other if the BBC is to ‘explain Britain to the World and the World to Britain,’ as one of the proposed BBC purposes requires. Without this, there is the risk that the tolerant and inclusive nature of British society will not be properly depicted in public service broadcasting.
18. A strong BBC must reflect this breadth of religious and community life in its output. Alongside specialist output, soaps, dramas, documentaries and other programmes

¹¹ Taking Belief Seriously, May 2005 <http://www.cofe.anglican.org/news/pr1506.html>

¹² House of Lords’ BBC Charter Select Committee 2nd Report, vol I, Ch 8

¹³ House of Lords’ BBC Charter Select Committee 2nd Report, vol II

¹⁴ Ibid

should provide opportunities where ordinary characters can be seen to practise their faith. As BBC World Service correspondent Jane Little put it in 'Taking Belief Seriously': *"The challenge is to take religion out of the box, and to see the way religion and spirituality bleed into each other, and into our political and cultural life¹⁵."*

19. The purposes set out in the White Paper must signal the importance of covering religious and ethical perspectives. If not, the consultation processes on the purpose remits and service licences will be incomplete and flawed. As it is, the purposes do not signal clearly an obvious place where moral and ethical dilemmas will be discussed or where the nation can come together at times of grief or celebration. Unless this is better explained, the public will not see where religion or many other programme types fit into the purposes. They may conclude that some programme types might be excluded now or at some future time.
20. Religion is not the only subject area apparently missing from the purposes. A place for children's programming and coverage of science along with some others is not apparent. It may be that there is a perfectly obvious place for all of these, within the 'civil society' or 'citizenship', 'representing communities' purposes, but the absence of any mention of them apparently relegates them to an irrelevance.

Other concerns

21. As well as the risk that the BBC Trust could abandon some programme types from its purposes, there is a risk is that some stations could become specialist offerings catering to niche markets. Changes to service licences might lead to particular programme types being excluded from those services. This ought to be subject to careful scrutiny.
22. We are concerned that a simple and comprehensible system is being abandoned in favour of a complex and obscure one making the activities of the BBC less, not more transparent to licence-fee payers. They are foregoing the clarity in the present Charter with too much being left to the BBC Trust's framing of 'purpose remits' and 'service licences'.
23. The role of the BBC as the market-leader in quality and content terms is under threat. The Charter and Agreement must ensure that high quality is not just an option for BBC programmes or content. The suggestion that programmes and items of content must display 'at least one' of the characteristics aimed at ensuring distinctiveness and quality is ambiguous. Is quality optional? If it is mandated in some other way this ought to be spelt out. It should be quite clear that high quality is essential in all output. The proposals import the Communications Act's requirement for quality programmes in s 264 (4) into the Agreement, but this refers to high general standards across all public service broadcasting, not about the BBC as the benchmark of public service broadcasting.
24. The Church of England welcomes greater competition for resources to make programmes between the BBC and independent producers. We recognise the benefits that a plurality of programme supply can bring. But the monitoring of independent production for the BBC must be about more than just the fairness of the competitive

¹⁵ Taking Belief Seriously, May 2005 <http://www.cofe.anglican.org/news/pr1506.html>

process. The Trust should also be given a duty to monitor and safeguard the capacity of the BBC to build-up and retain specialist expertise. Without this, the quality of the BBC's output could suffer.

25. The expertise of in-house specialist teams is key to the BBC's ability to produce programmes of consistently high quality. The Trust is responsible for fair competition between independent and in-house teams whereas management is responsible for the success or failure of in-house capacity. Some in-house teams, especially small and less well resourced ones such as Religion and Ethics, will feel threatened by this imbalance. Both the high quality of output and consistency of output could find themselves under threat.
26. The BBC should not become the sole provider of public service broadcasting. The White Paper should strengthen the operating environment for other public service providers, especially Channel 4. We regret that the White Paper omits any mention of Government, as opposed to Ofcom, policy on spectrum charging. Relief from spectrum charging could also become a policy instrument to give broadcasters new incentives to provide public service broadcasting.
27. The Church of England supports the significant move away from London-based production and values, as long as this is determined by proper, controlled budgeting and expenditure control. This must deliver value for the licence-fee payer. Care also needs to be taken over how resources are shared in the proposed broadcasting hub. Licence fee payers' investment should not be used to benefit commercial broadcasters, some of whom may be in overseas ownership.
28. Departments in Manchester must not become remote from decision-making. The Trust should be given a clear steer about its obligation to ensure this in the Agreement. The Religion and Ethics department, which moved some years ago to Manchester is a good case-study of the tensions that can follow when commissioning is divorced from production.
29. In 2016, the BBC must still be strong, independent and permitted to take public service content onto whatever platforms then exist. It should be made clear that on-demand services must not 'cherry-pick' programmes but should also include public service output.
30. In conclusion the Church of England believes that this must not be the BBC's last Charter but the bridge over which the BBC crosses into the digital future.

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