

# Response to Ofcom consultation: Television Appeals for Donations to Make Programmes or Fund Services

*This memorandum is written on behalf of*  
**CBC – Christian Broadcasting Council**



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The Christian Broadcasting Council of the United Kingdom (CBC) wishes to take up Ofcom's invitation to comment on their proposals regarding the making of appeals by television channels for donations to make programmes or fund services. Our comments follow our own internal CBC discussions with members who are either television and/or radio broadcasters plus conversations that we have had with Ofcom officials in various meetings concerning this matter. We have laid out our responses in the order of Ofcom's consultative questions in order to help clarify our responses.

**Question 1:**

*If you are a television broadcaster, would you be interested in broadcasting appeals either now or at some stage in the future if the current ban were lifted?*

*If you are a radio broadcaster, do you broadcast appeals now or are you likely to in the future?*

CBC is neither a radio nor a television broadcaster but in discussions with our members who are broadcasters it appears that the existing Christian television stations, that are up-linking from the UK and are therefore subject to UK regulation, would value the freedom of being able to make appeals for donations to make programmes or fund their services.

The two existing Christian terrestrial radio broadcasters – *Premier Christian Radio* (ILR – AM) & *Cross Rhythms City Radio* (Community – FM) – have both already appealed for funding on-air and Ofcom says in paragraph 5.3 that it has received no complaints about appeals broadcast on radio. In addition a number of the newly licensed Christian community FM radio stations and a local DAB programme licensee have indicated to CBC that they will be making on-air appeals as one of the ways in which they will be funding their services once they have commenced broadcasting.

**Question 2:**

*Do you agree with the above assessment [Section 4] of the role of television appeals in terms as a source of funding? If not would it be helpful to have your own assessment with as much supporting information as possible.*

CBC is encouraged by Ofcom's assessment of the role that television appeals make especially in the area of Christian television. We would agree that

appealing for funds is more attractive for specialist channels and such UK-based Christian channels as *Revelation TV* are currently unable to make appeals for funds on-air. Ofcom points out in paragraph 4.10 that the *God Channel* raises substantial sums from their Missions Week broadcasts. The *God Channel*, while it up-links from a facility near Jerusalem and therefore comes outside Ofcom regulation, does have offices in Sunderland and as a UK-based charity they are subject to UK Charity Law.

The reasons that people support such channels as *Revelation TV* and the *God Channel* is because they are able to view the type of programmes that are not available on other TV channels. Many Christians value the positive Biblically based teaching that they can see on these channels and are therefore prepared to financially support these channels.

**Question 3:**

*Do you agree with the above assessment [Section 4] of competition issues?*

CBC endorses the point made by Ofcom in paragraph 4.16 that the *lifting the ban would place religious/ethnic channels licensed by Ofcom on a more even footing with those licensed abroad and broadcasting to the UK*. CBC also supports the additional Ofcom comment *that television local/community services would have the same opportunity to broadcast appeals as those in radio*.

Most Christian charities, churches and organisations are funded by supporters giving financial donations as gifts or tithes. **CBC supports the right of all Christian and religious television broadcasters** as well as local/community television stations, if they so wish, **to appeal on-air for financial support** both for individual programmes and for the operation of their broadcasting enterprise. **We believe that the lifting of the ban will remove the elements of distortion in competition that currently exist.**

**Question 4:**

*What are your views on the possible safeguards to protect viewers and maintain editorial independence outlined above? Do you think that some or all of these should be applied if the ban is lifted? Are there other safeguards which you would like to see?*

Already radio stations like *Premier Christian Radio*, which have not been banned under the current Ofcom codes, have shown the way forward with responsibly worded appeals for funds.

To overcome the problems where some overseas religious broadcasters have played upon the susceptibilities of the vulnerable, in ways that are very similar to 'the selling of indulgences' in the Middle Ages, CBC would endorse establishing self-regulatory mechanisms similar to those endorsed by the National Religious Broadcasters (NRB) in the United States where its members sign up to the code of the Evangelical Council for Financial Accountability (ECFA). It should be noted that not all the US-based religious TV satellite broadcasters currently transmitting to Britain and the rest of Europe are members of NRB and ECFA.

**CBC would support the Ofcom suggestion in paragraph 5.8 that section 10.15 of the Ofcom Code should be cross-referred to section 4.6 that**

says that *religious programmes must not improperly exploit any susceptibilities of the audience* and make it clear that this does extend to appeals on religious channels. We also like the idea of strengthening such action by incorporating the phrase from the ECFA's Seven Standards of Responsible Stewardship that says that a broadcaster *must not create unrealistic donor expectations of what a donor's gift will actually accomplish*. We would also suggest to Ofcom that they should look into ways of seeing if such regulation could be implemented within the Television Without Frontiers (TWF) directives in order that a level playing field between UK-based broadcasters and those TV broadcasters up-linking from outside this country would exist in future.

**CBC would endorse the suggestion that broadcasters should adopt a code similar to the Code of Conduct and Donor's Charter issued by the Institute of Fundraising (IoF).** Ideally this should be done by broadcasters joining the Institute or perhaps, **for small Christian and other religious broadcasters, incorporating such a code and charter into their own declarations.** Recently the Evangelical Alliance (EA) has worked with the Charity Commission to draw up a draft code for independent churches to help them conform to Charity Commission rules. CBC is investigating a similar approach with other Christian church and broadcasting organisations that would help strengthen such a fundraising Code of Conduct and Donor's Charter for broadcasters based on a combination of the IoF and ECFA approaches.

By adopting such a charter UK broadcasters would not be offering their financial supporters such incentives as an 'Access to Heaven' credit card and saying that ownership of such a card guarantees access to eternity on the Day of Judgement. CBC would draw to the attention of any broadcaster thinking of going down such a path and not following the Donor's Charter that in the Bible there is a warning about these dubious practices to Christian believers and there is also a warning to those people undertaking them that goes far beyond them just receiving a fine from Ofcom. In the Bible in 2 Peter 2:1-3 (New Century Version) it is written that, *There used to be false prophets among God's people, just as you will have some false teachers in your group. They will secretly teach things that are wrong--teachings that will cause people to be lost. They will even refuse to accept the Master, Jesus, who bought their freedom. So they will bring quick ruin on themselves. Many will follow their evil ways and say evil things about the way of truth. Those false teachers only want your money, so they will use you by telling you lies. Their judgment spoken against them long ago is still coming, and their ruin is certain.* By way of historical and biblical support for this assertion Martin Luther condemned such practices and Jesus quoted from the Old Testament books of Isaiah and Jeremiah saying, *"It is written, 'My house shall be called a house of prayer,' but you have made it a 'den of thieves.'* " Matthew 21:13 (New King James Version)

On the question of editorial independence CBC believes that religious and local/community TV stations need to have a wide range of financial support from many individual donors. In such a way editorial independence can be maintained enabling the broadcaster to conform to Section 10.15 of the

Broadcasting Code. The broadcaster should not rely on financial support from a single source such as a 'Mr Big Bucks' or a local/regional grant-making authority. *Premier Christian Radio* shows how a model of a variety of methods of funding from a variety of sources helps safeguard the editorial independence of that radio station.

CBC supports the suggestion made in paragraph 5.12 that no radio station or TV channel should accept grants from bodies that are of a wholly or mainly political nature.

**Question 5:**

*Taking the above [Annex 5 – Impact Assessment] into account, are you in favour of the ban on appeals being lifted with certain safeguards or would you prefer that it remain in place?*

**CBC strongly supports the lifting of the ban on appeals together with certain safeguards** as we have already indicated in our response to Q4. **We support the case put by Ofcom, in paragraph A5.2, as this will enable the Christian broadcasting sector to flourish and grow in this country** as well as enabling local/community television to also appeal for funds on-air. If there is no lifting of the ban we may well see the disappearance of a sector of our broadcasting industry to other regulatory regimes where they are already allowed to appeal for donations.

We trust that our comments are of help to Ofcom in formulating their policy on this matter and CBC is willing to help in any way we can to support the regulation of responsible on-air fundraising by broadcasters.

Yours truly,

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Chairman of the Executive Council – Christian Broadcasting Council

J Peter Wilson  
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*The Christian Broadcasting Council, known as CBC, was founded in 1983:*

- ✓ *To stimulate and promote the knowledge of the Christian faith and the propagation of the Gospel of Jesus Christ through the broadcasting media in the United Kingdom.*
- ✓ *To encourage the highest standards of Christian media communication.*
- ✓ *To support and develop the knowledge and standards of all those involved in broadcasting.*
- ✓ *To bring together in fellowship those working in broadcasting and those who support the vision of CBC, under girding and encouraging them in their spiritual lives.*

*Membership is open to individuals, corporate bodies and Christian ministries. The Executive Committee of CBC contains representatives from the independent Christian broadcasting sector including radio (community, commercial & RSL), television and independent production.*