26 November 2026

NOTICE OF A DECISION UNDER SECTION 3(3) OF THE BROADCASTING ACT 1990 IN RESPECT OF LICENCE TLCS001605BA HELD BY SHELLS FOR MEDIA PRODUCTIONS LIMITED

Background

1.1 Lualua TV is an Arabic language news channel focused primarily on Bahrain, currently available in the UK as a livestream via its website www.lualuatv.net. The content available via this website is not subject to the Broadcasting Code. Lualua TV is therefore not currently being broadcast as a regulated television service in the UK under the Licence. The channel is provided by Shells for Media Productions Limited (company number 07652243) which also holds a Television Licensable Content Service ("TLCS") licence issued by Ofcom (the "Licence").

1.2 Ofcom granted Shells for Media Productions Limited (the "Licensee") a TLCS licence on 1 November 2011 for the service Al-Lula TV which was subsequently provided by satellite across the UK. In its application, Shells for Media Productions Limited said that all of the content was to be produced in the UK, and according to its website, it began broadcasting in June 2011 from London.[1] On 12 April 2018, Ofcom approved a request to change the name of the licensed service to "LuaLua TV".

1.3 On 22 February 2026, the Licensee applied to change the name of the licensed service on the Licence to "Pearl TV".[2] As the Lualua TV service was not being broadcast by satellite or cable in the UK at that time, Ofcom sought clarification as to whether the "Pearl TV" service would constitute a licensable television service and how and where it would be made available. Although the Licensee responded regarding administrative matters, it did not provide the information Ofcom had requested concerning how and where the proposed service would be made available. Ofcom sent further requests for clarification on 3 and 13 March 2026 but received no response. The proposed name change was therefore not progressed, and the licence continues to be held for the provision of the service "Lualua TV".

1.4 As the independent UK broadcasting regulator, Ofcom has an ongoing duty to be satisfied that broadcast licensees remain fit and proper to hold their licences. This document sets out Ofcom's reasons for deciding that it can no longer be satisfied that Shells for Media Productions Limited is fit and proper to hold a broadcast licence, and Ofcom has decided to revoke the Licence. Ofcom's concerns arise from content made available as part of the Lualua TV online livestream and content published on Lualua TV's social media account, which contains footage which appears to be from the Lualua TV service. Ofcom has also taken into account the Licensee's responses to requests for information made during the course of our enquiries.

[1] About Us – The Pearl Satellite Channel

[2] "Lualua" is the Latin script for the Arabic word meaning "Pearl".

Statutory framework

1.5 Ofcom's principal duty, set out in section 3(1) of the Communications Act 2003 (the "2003 Act") is to further the interests of citizens in relation to communications and the interests of consumers in relevant markets.

1.6 By section 3(2), Ofcom is required to secure (c) the availability throughout the United Kingdom of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests, (d) the maintenance of a sufficient plurality of providers of different television and radio services, (e) the application, in the case of all television and radio services, of standards that provide adequate protection to members of the public from the inclusion of offensive and harmful material in such services, and (f) the application, in the case of all television and radio services, of standards that provide adequate protection to members of the public and all other persons from (i) unfair treatment in programmes included in such services.

1.7 By section 3(3), Ofcom must, in performing its duties under subsection (1), have regard, in all cases, to (a) the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed; and (b) any other principles appearing to Ofcom to represent the best regulatory practice.

1.8 By section 3(4), Ofcom must also have regard, in performing those duties, to various matters as appear to be relevant in the circumstances, including "the need to secure that the application in the case of television and radio services of standards … is in the manner that best guarantees an appropriate level of freedom of expression" and "the opinions of consumers in relevant markets and of members of the public generally".

1.9 Article 10 of the European Convention on Human Rights protects a broadcaster's right to freedom of expression, including the freedom to "hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers". It does not prevent States from requiring the licensing of broadcasting. Article 10(2) says that the exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to formalities, conditions, restrictions or penalties as are "prescribed by law" and "are necessary in a democratic society" in the interests of a prescribed legitimate aim, which include amongst other things, "in the interests of … public safety, for the prevention of disorder or crime, [or]… for the protection of … the rights of others."

Broadcast licensing

1.10 Shells for Media Productions Limited holds licence TLCS 001605BA to provide the Lualua TV service via satellite/cable under the Broadcasting Act 1990 (the "1990 Act").

1.11 Under section 3(3) of the 1990 Act, Ofcom:

- shall not grant a licence to any person unless satisfied that the person is a fit and proper person to hold it; and
- shall do all that they can to secure that, if they cease to be so satisfied in the case of any person holding a licence, that person does not remain the holder of the licence.[3]

[3] This is reflected in Condition 28(3)(c)(Revocation) of the TLCS Licence.

1.12 Therefore, Ofcom has an ongoing duty to remain satisfied that the Licensee is fit and proper to hold a licence to provide the licensed service.

1.13 If a broadcaster is found not to be fit and proper to hold a particular licence, then Ofcom must revoke that licence. The broadcaster cannot broadcast again unless the reasons making it unfit have been fixed. This is a major interference with freedom of expression, as it prevents the broadcaster from broadcasting and restricts the number of voices being heard and the range of programming available to audiences. Ofcom considers that the threshold for finding a broadcaster not fit and proper to hold a broadcast licence is, therefore, high.

1.14 The main reason for broadcasting to be regulated is to protect audiences from harm. To this end, broadcast licensees are required to comply with Ofcom's Broadcasting Code[4] (the "Code"), containing standards applicable to the content that is broadcast. This covers a range of matters, including for example the safeguards that must be observed in the interests of public safety, for the prevention of disorder or crime, or for the protection of the rights of others. In particular, Section Three of the Code requires that material containing hate speech or abusive and derogatory treatment of individuals, groups, religions, or communities must not be included in television or radio programmes except where it is justified by the context. Section Two of the Code requires that generally accepted standards are applied to the content of television and radio services to provide adequate protection for members of the public from the inclusion of harmful and/or offensive material in programmes.

1.15 The Code defines "hate speech" as: "All forms of expression which spread, incite, promote or justify hatred based on intolerance on the grounds of disability, ethnicity, social origin, gender, sex, gender reassignment, nationality, race, religion or belief, sexual orientation, colour, genetic features, language, political or any other opinion, membership of a national minority, property, birth or age".

1.16 In judging whether someone is fit and proper to hold a broadcast licence, the central consideration is whether they can be expected to be a responsible broadcaster.[5] When Ofcom is assessing whether an existing licensee remains fit and proper, a key consideration will be that person's compliance with regulatory standards and the conditions of its licence.[6] We may also look at non-broadcasting related conduct where we consider that it is relevant to the likely future conduct of the broadcaster licensee – for instance, if it poses a clear risk of substantial harm to an audience or if it indicates that the licensee lacks respect for, or ability to comply with, the regulatory regime so that continued ownership of the licence would undermine that regime. We may also look at non-broadcasting related conduct where we consider it is likely to undermine public confidence in the broadcasting regime as a whole.[7]

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[4] The Ofcom Broadcasting Code.
[5] https://www.ofcom.org.uk/__data/assets/pdf_file/0012/113043/rt-investigations.pdf
[6] For example, serious, repeated or ongoing breaches of standards may suggest a lack of fitness and properness.
[7] *Harris v Registrar of Approved Driving Instructors* [2010] EWCA Civ 808, *R (Carlin) v Ofcom [2022]* NIKB 20, and *R (Avaaz Foundation) v Ofcom* [2018] EWHC 1973

Ofcom's procedures in this case

1.17 Ofcom's Procedures for the consideration of statutory sanctions in breaches of broadcast licences[8] outlines the procedures that Ofcom will normally follow when considering the fitness and properness of broadcast licensees. These Procedures state that: *"where a person is no longer considered to be "fit and proper" to hold a licence, Ofcom will follow… a procedure in which the licensee will be given an opportunity to make representations on Ofcom's proposal to revoke the licence. Depending upon the urgency of the situation, the period for representations may be very short, possibly a matter of hours."* (paragraph 1.30).

1.18 Ofcom sent the Licensee a Notice on 9 November 2026 (the "9 November Notice"), informing it that Ofcom was minded to decide that it could no longer be satisfied that the Licensee was a "fit and proper" person for the purposes of the 1990 Act, and as a consequence of this decision Ofcom was minded to revoke the Licence. The 9 November Notice set out the reasons for the proposed decision, alongside (a) a translation of the speech by Abdul Malik Al-Houthi (b) translations of the social media posts and accompanying videos about which we had concerns, and (c) screenshots showing the discrepancies in the recordings provided to Ofcom in response to information requests.

1.19 At the same time, we invited the Licensee to make written representations on this matter by 16 November 2026 at 5.00pm, and offered it the opportunity to attend an Oral Hearing either online, or in person at Ofcom's offices in London on 25 November 2026. We did not receive any response to this invitation. The Licensee did not make any written representations, or request an Oral Hearing.

1.20 We considered that expedition was necessary in this case. While we recognise that the Lualua TV service is not currently broadcasting in the UK, as it currently holds an Ofcom broadcasting licence, it is possible for its service to recommence broadcasting at any time (by coming to an arrangement with a broadcasting platform specific to the UK).

1.21 As set out above, Ofcom is required by the 1990 Act to "do all that [we] can" to secure that, if we cease to consider that a person is fit and proper to hold a licence, that person does not remain a licence holder, which in this case would mean the licence is revoked. In this case we consider that Ofcom was required, pursuant to this duty, to carry out an expedited process in order to determine whether or not the Licensee remains fit and proper. We considered that expedition was required due to the high public interest in the case and the exceptional circumstances of the case.

Compliance history

1.22 Shells for Media Productions Limited has been found in breach of its licence once, for failure to pay its annual licence fee on time. This breach was published in Ofcom's Broadcast and On Demand Bulletin on 8 January 2018[9], and the outstanding fee was subsequently paid.

Context

1.23 Since 7 October 2023, there has been a period of escalating tension in the Middle East following the attack on Israel by the proscribed terrorist organisation Hamas, and the subsequent military response by the Israeli Government and state. The terrorist attacks

[8] See: Procedures for the consideration of statutory sanctions in breaches of broadcast licences.
[9] *Ofcom Broadcast and On Demand Bulletin*, Issue 345, 8 January 2018.

carried out by Hamas on 7 October 2023 are referred to by Hamas as the "*Al-Aqsa Flood operation"*. These events provide the backdrop to the material made available online by the Lualua TV service below.

Proscribed organisations

1.24 Under the Terrorism Act 2000 (the "2000 Act"), Hamas, Hezbollah, and Palestinian Islamic Jihad are proscribed organisations in the UK.[10]

1.25 An organisation is proscribed where the Secretary of State has exercised the power under section 3 of the 2000 Act to proscribe it by order on the basis that the Secretary of State believes the organisation is "concerned in terrorism" within the meaning of section 3(5).

1.26 Ofcom considers that the publication (online or otherwise) by a TV service of material which expresses support for, promotes, glorifies or otherwise seeks to encourage support for proscribed terrorist organisations is highly relevant when assessing whether the licensee of that TV service is capable of acting as a responsible broadcaster and whether Ofcom can remain satisfied that it is fit and proper to hold a broadcast licence.

1.27 Nothing in this Decision constitutes a determination that any person has committed a criminal offence under the Terrorism Act 2000 or any other legislation. The question for Ofcom is instead whether the material identified gives rise to concerns as to whether the Licensee can be relied upon to act as a responsible broadcaster and whether Ofcom can remain satisfied that it is fit and proper to hold a broadcast licence.

Relationship between Shells for Media Productions Limited and the Lualua TV service provided online, and other online activities

1.28 Before considering the content identified below, Ofcom has considered the extent to which that content can properly be attributed to, or relied upon in assessing, the Licensee.

1.29 In October 2026 Ofcom became aware of content which had been included in a TV channel being streamed online on lualuatv.net, a website which streams the Lualua TV service, and material which had been published online on Lualua TV's social media account.

1.30 During the course of Ofcom's enquiries, Shells for Media Productions Limited provided three recordings of the Lualua TV service website livestream. This included recordings that had not been disclosed in response to Ofcom's initial enquiries, notably, an excerpt of a speech by Abdul Malik al-Houthi broadcast on the website livestream. This was only provided following further requests from Ofcom.

1.31 In Ofcom's view, Shells for Media Productions Limited's ability to access, obtain and provide recordings of Lualua TV's online channel, including material that had not previously been supplied to Ofcom, provides evidence of a direct operational relationship between Shells for Media Productions Limited, and the provision of the channel online.

1.32 Ofcom has also taken into account the use of the "Lualua TV" name and branding on the livestream and associated social media account considered in this Decision. We note that the website on which the Lualua service is available is called "www.lualuatv.net", and provides an Arabic language news channel focused primarily on Bahrain. It describes itself

[10] See: Proscribed terrorist groups or organisations - GOV.UK

as being Lualua TV. It has prominent Lualua TV branding, and carries the Lualua TV logo in its output. The contact details for the Lualua TV website are the same corporate domain as those for the Ofcom licence contact. These factors all indicate that the livestream provided on the Lualua TV website is the Lualua TV service and is the service which was previously provided by the Licensee in the UK by satellite.

1.33 Similarly, the social media account associated with Lualua TV is operated under the identifier "@Lualuatv", with the Lualua TV logo, and contains a large number of videos with the Lualua TV logo on screen throughout during playback.

1.34 In light of all the available evidence, Ofcom considers there is a sufficient connection between Lualua TV service being streamed online and material posted on Lualua TV's social media account and Shells for Media Productions Limited as the provider of any potential "Lualua TV" service under the Licence, such that that material can be taken into account in assessing whether the Licensee remains fit and proper to hold a broadcast licence.

The livestream on 7 October 2026

1.35 On 7 October 2026, the third anniversary of the attacks by Hamas on Israel, LuaLua TV transmitted a 45-minute segment on its website featuring a speech by Abdul Malik al-Houthi. Abdul Malik al-Houthi is a well-known political and religious leader, and has been leader of the Houthis, a political and paramilitary group since 2004[11]. The speech was livestreamed in Arabic. Ofcom obtained an English translation of the content, a copy of which was sent to the Licensee.

1.36 During the entire duration of the segment, two banners were displayed on screen. One banner contained the statement: "*God is Greater. Death to America. Death to Israel. Curse the Jews. Victory to Islam*".

1.37 The material containing the above statements was livestreamed continuously for approximately 45 minutes. Ofcom considers the duration, prominence and cumulative effect of the content to be relevant factors in its assessment.

Glorification of the 7 October 2023 attacks

1.38 Abdul Malik al-Houthi repeatedly characterised the events of 7 October 2023 in positive terms. Referring to the attacks carried out by Hamas, he described them as an "*important, great and blessed operation*", a "*historical milestone*", a "*major leap forward"*, and a "*successful, powerful, meticulously planned, and expertly executed operation*".

1.39 He further stated they were "*such a leap forward, such significant performance, and such high effectiveness, the operation created an opportunity for the entire Islamic nation and opened up very important horizons for it on the ground, in reality, and in practical terms. It demonstrated that the Palestinian people, in their conduct of struggle, are capable of a high degree of proficiency, effectiveness, serious commitment, and meticulous planning*".

1.40 Abdul Malik al-Houthi further described what he considered to be the consequences of the attacks, including "*the exposure of the entire Zionist system… there had already been many accounts revealing the reality of Zionism, its aggressive objectives, its satanic practices, its grave crimes, and its harmful agenda, which poses a danger to human society as a whole. These accounts have shown how it views human societies, as well as its orientations and*

[11] The Houthis are not a proscribed organisation under UK law.

underlying principles, connected to documents, beliefs, books, actions, practices, and plans that have all been brought to light".

Calls for support and assistance and criticism of those who did not support the 7 October attacks

1.41 Abdul Malik al-Houthi stated that the attacks had created an "*opportunity for the entire Islamic nation to stand alongside the Palestinian people and provide them with real support in every sense of the word. This is their humanitarian and Islamic duty, as well as their moral and ethical responsibility".*

1.42 He further stated: "*it was therefore the duty of the entire nation to support the Palestinian people and take the initiative at the political, military, economic, and humanitarian levels, providing every form of assistance. However, what actually happened was that those who took the initiative with the utmost care, dedication, and support were acting on behalf of the Israeli enemy—an enemy that stands on the side of falsehood, occupation, usurpation, criminality, and oppression*".

1.43 Referring to those who were not involved in the attacks, he stated "*those who failed to provide support and those who were complicit. The prevailing stance was one of abandonment and failure to support by the majority, complicity by some, and serious commitment to advocacy, support, and assistance by only a few—that is, at a limited level within the framework of the Axis of Jihad and Resistance"*.

1.44 He also stated "*had they moved to provide support and assistance to the Palestinian people, the blessed Al-Aqsa Flood operation would have indeed prepared the way for a major leap forward for the entire nation, not merely in the Palestinian people's performance in their struggle. It was an achievement of such magnitude that it represented an opportunity for the whole nation to confront an enemy common to them all" and "yet what happened was regrettable: widespread abandonment and failure to support, accompanied by a considerable degree of complicity*".

Praise for groups which are part of Hamas and Palestinian Islamic Jihad

1.45 Referring to Palestinian armed groups operating in Gaza, Abdul Malik al-Houthi stated: *"on the Palestinian side, the Palestinian people in Gaza and their fighting factions, foremost among them the Al-Qassam Brigades, the Al-Quds Brigades*[12]*, and the other factions, all stood in a unified position. Something particularly remarkable emerged during this major phase and the subsequent Zionist aggression against the Gaza Strip, which has been ongoing for two full years and more, and which in reality remains ongoing and continues to this day"*.

1.46 He further stated: "*what stood out throughout this period was their extraordinary resilience and steadfastness—a level of endurance so great that it astonished the world to a considerable extent".*

[12] The Al-Qassam Brigades are part of Hamas, which is a proscribed organisation. The Al-Quds Brigades are part of Palestinian Islamic Jihad which is a proscribed organisation.

Criticism of others describing proscribed organisations as terrorists

1.47 Abdul Malik al-Houthi criticised the designation of Palestinian armed groups as terrorists, stating: *"Saudi Arabia's classification of the fighters in Gaza as terrorists, and its labelling of them as such, are among the clear facts that reveal the true nature of the Saudi position. The same applies at the political level and across all other levels".*

1.48 He further stated: *"the Palestinian fighters continued to be labelled as terrorists, while Saudi media outlets continued to distort their image, hold them responsible for the crimes committed by the Israeli enemy, incite against them, and disparage them".*

Praise and support for Hezbollah

1.49 A substantial portion of the speech concerned Hezbollah. Abdul Malik al-Houthi stated: "*at the forefront was the Lebanese front, represented by Hezbollah in Lebanon, which opened a direct front against the Zionist enemy from the very beginning and engaged in combat operations, making tremendous sacrifices and offering a large number of martyrs, including the party's leaders*".

1.50 He further stated: "*Hezbollah fought a major battle that continues to this day, confronting Zionist tyranny in an extremely fierce struggle. This was because the Zionist enemy launched a major and intensive aggression against Lebanon, seeking to eliminate Hezbollah and bring the Lebanese front to a definitive end. The enemy pursued this objective because of the Lebanese front's leading and prominent role in confronting the Zionist enemy for more than forty years, dating back to its earliest days*".

1.51 He also stated: "*Its role in the Battle of the Al-Aqsa Flood and the subsequent Zionist aggression against the Palestinian people in the Gaza Strip was also significant. It served as a direct and powerful front—the largest and most important front in the nation in terms of providing direct, effective, strong, and consequential support to the Palestinian people*".

Praise for Hezbollah leaders

1.52 Abdul Malik al-Houthi stated: "*foremost among them was His Eminence, the Secretary-General of Hezbollah, the martyred Sayyid Hassan Nasrallah, may God be pleased with him, a martyr of Islam and humanity. Also among them was Hezbollah's Secretary-General, Sayyid Hashem Safieddine, may God be pleased with him, as well as other leaders at various levels, including military commanders, and Hezbollah's fighters more generally*".

1.53 He later referred to Imad Mughniyeh, a senior Hezbollah commander, as "*one of Hezbollah's heroic military leaders*" and stated "*Saudi Arabia had been conspiring against Hezbollah in Lebanon from an early stage. There are indications and evidence, moreover, that it contributed to the assassination of one of Hezbollah's heroic military leaders, Imad Mughniyeh, may God's mercy be upon him, by providing intelligence and information. From those early stages, it was also working to contribute to attempts to assassinate His Eminence, the martyred Secretary-General of Hezbollah, Sayyid Hassan Nasrallah, may God be pleased with him*".

Criticism of those opposing Hezbollah

1.54 Abdul Malik al-Houthi characterised efforts directed against Hezbollah negatively, stating: "*nevertheless, there has also been involvement in conspiring against the Islamic resistance in Lebanon and targeting Hezbollah in every possible way, through all forms of plots and cooperation with the Israeli enemy and the Americans in their efforts to eliminate the*

resistance in Lebanon and bring this front to an end. This is the very front that directly supports the Palestinian people and remains directly engaged against the Zionist enemy".

1.55 He further stated "*Saudi Arabia also plays a fundamental role in these efforts. It works intensively, provides funding, takes political action, and exerts pressure within official circles in Lebanon. It attempts to buy loyalties and political positions among Lebanese groups, and works to turn everyone against Hezbollah. It pursues these efforts directly, operating on the same front as the Israeli enemy and the Americans*" and "*Why? Saudi Arabia's hostility towards Hezbollah in Lebanon is not new, nor did it begin only when Hezbollah and its Secretary-General, may God be pleased with him, adopted a position of solidarity with the Yemeni people in their suffering and oppression*".

1.56 He also stated: "*it has no need to make Hezbollah its enemy and confront it with hostility*" and "*Saudi Arabia has no need to do any of this. Why, then, does it act this way? Whose interests is it serving?*"

1.57 He stated: "*[Saudia Arabia] could have maintained normal relations with these parties, at the very least, as would be natural, just as the rest of the Muslim nation does. Yet it chooses to act as it does"*.

1.58 At the end of the excerpt of the speech provided to Ofcom, and as referred to above, Abdul Malik al-Houthi described what he considered to be the consequences of the attacks, including "*the exposure of the entire Zionist system… there had already been many accounts revealing the reality of Zionism, its aggressive objectives, its satanic practices, its grave crimes, and its harmful agenda, which poses a danger to human society as a whole. These accounts have shown how it views human societies, as well as its orientations and underlying principles, connected to documents, beliefs, books, actions, practices, and plans that have all been brought to light*".

1.59 Ofcom also reviewed and obtained translations of the material the Licensee told us was broadcast immediately before and after the excerpt of the speech. We did not identify any content which provided editorial challenge, critical analysis or contextualisation of the views expressed by Abdul Malik al-Houthi. The livestream simply transitioned into the speech, which was then livestreamed for 45 minutes uninterrupted, before cutting away abruptly. This absence of contextual material is relevant to our assessment of the manner in which the content was presented.

Analysis of the speech

1.60 Ofcom recognises that it is legitimate to offer commentary and perspectives on the ongoing conflict between Israel, Hamas and other organisations. We also understand that within this context, it is legitimate for a broadcaster to include criticism of the actions of the Israeli Government and state, and other countries in its service. It is also legitimate for news services to report what leaders of proscribed terrorist organisations have said, as long as it is appropriately contextualised and not done in a way that expresses support for, promotes, glorifies and/or seeks to encourage support for proscribed terrorist organisations. However, Ofcom has extremely serious and significant concerns that Lualua TV had livestreamed this speech in the way that it did.

1.61 Ofcom considers that the speech as livestreamed contained material that constituted hate speech and abusive and derogatory treatment towards Jewish people, in particular in the prominent display throughout of a banner reading "*Death to Israel. Curse the Jews*". This is clear abuse of Jewish people on the basis of their ethnicity or religion.

1.62 We noted the frequent references to Zionism and the "*Zionist enemy*" and "*Israeli Zionist enemy*" throughout the speech. Zionism is described as possessing "*satanic practices*" and a hidden, harmful agenda which threatens "*human society as a whole*". References to supposedly revealed documents, beliefs, books, practices and plans further contribute to a narrative of a malign and concealed collective project.

1.63 In our view, in this particular context, the characteristics attributed to "*Zionism*" reproduce recognisable antisemitic tropes, namely the portrayal of a covert and malevolent force exercising harmful influence over society. The wider content of the speech makes the connection to Jewish people sufficiently clear. In particular, the speech repeatedly references the "*Zionist enemy*", while a banner displaying the words "*Curse the Jews*" remained prominently visible throughout. Taken together, in this part of the speech, these elements appear to conflate Zionist identity with Jewish identity and to attribute collective wrongdoing to Jewish people.

1.64 We therefore considered that the speech went beyond criticism of a political ideology or the actions of the State of Israel and, in this context, could reasonably be understood as referring to Jewish people in a derogatory and abusive way. In our view, this amounted to antisemitic hate speech directed at Jewish people and would have been highly offensive to Jewish people.

1.65 Ofcom also considered that the livestream contained content which glorified the 7 October 2023 attacks, and the terrorist actions taken by proscribed organisations. It contained expressions of support for, praise of Hamas and Palestinian Islamic Jihad and criticised others for describing proscribed organisations as terrorist groups. The speech also expressed support for Hezbollah, praised Hezbollah and its leaders and criticised those who opposed the organisation. Further, it included a call for support and assistance (including military assistance) for the actions taken by proscribed organisations. No challenge, critical analysis, or additional context was given.

1.66 Ofcom considers this content expresses support for, promotes, glorifies or otherwise seeks to encourage support for proscribed terrorist organisations. The potential for harm arising from terrorism and the spread of terrorist ideology is extremely high. In our view this content could significantly harm audiences, as it supports terrorism, terrorists and terrorist acts and is highly offensive.

Requests by Ofcom for copies of the livestream

1.67 On 13 October 2026, Ofcom requested, pursuant to Condition 12 of the Licence and for the purposes of Ofcom's assessment under section 3(3) of the Broadcasting Act 1990, recordings of content transmitted as part of the Lualua TV live feed between 12:00 and 16:00 (UK time) on 7 October 2026, together with recordings of any subsequent repeats, excerpts or retransmissions of that content.

1.68 Recordings were first provided by the Licensee on 15 October 2026. However, upon review Ofcom identified significant gaps in the material supplied, including recordings whose durations were substantially shorter than the periods indicated by their filenames and several periods for which no recordings had been provided. The transmission of the excerpt of the Abdul Malik al-Houthi speech was not included in the recordings provided. On 16 October 2026, Ofcom wrote to the Licensee identifying these deficiencies and requesting the missing content and clarification regarding the time periods covered. The Licensee provided further recordings on 19 October 2026.

1.69 Upon reviewing the 19 October 2026 recordings, Ofcom identified that an approximately 45 minute segment during which Abdul Malik al-Houthi appeared on screen (14.15- 15.00 BST) consisted only of a still image with no accompanying audio. On 19 October 2026, Ofcom therefore requested a recording of the content as transmitted and sought clarification regarding those discrepancies. On 20 October 2026, the Licensee provided a further recording containing what it said was "the requested recording", which contained a recording of 45 minutes of a speech by Abdul Malik al-Houthi on 7 October 2026. Ofcom has had the excerpt of the speech the Licensee has provided translated as part of its assessment. However, we continue to have concerns that this is not the full version of the speech as livestreamed on the website as the recording cuts abruptly in the middle of the speech as it was delivered – we note that the version of the speech available elsewhere online is 1:38:50 minutes long. Ofcom wrote to the Licensee again on 28 October 2026 with further queries about the content, but received an automated bounce-back email response that the email had not been delivered. No further recordings were provided by the Licensee.

1.70 Ofcom identified differences between the first recording provided to Ofcom and the full version of livestream later provided by the Licensee. In the first recording provided by the Licensee, on-screen banners and other visual material that had appeared during the original transmission which said "*God is Greater. Death to America. Death to Israel. Curse the Jews. Victory to Islam*" were either removed or obscured.

Ofcom's concerns about posts on the Lualua TV social media account

1.71 We carried out a high level review of social media posts from 2024 onwards and found several which we considered express support for, promote, glorify or otherwise seek to encourage support for proscribed terrorist organisations. They included the following[13] :

1) **A social media post dated August 1 2024:** This post stated "*Leader #Fuad_Shukr became a martyr on the road to Al-Quds, leading the support front in #Lebanon and supporting Muslims in Bosnia and Herzegovina #Aqsa_Flood*" alongside a Lualua branded video profiling Fouad Shukr, a senior Hezbollah military commander and founding member, who was killed on 30 July 2024. The report refers to him as a "great commander" who has "joined the ranks of the martyrs who sacrificed their lives for the liberation of the land and the Islamic holy sites". It outlines his life, role within Hezbollah, and activities as one of the organisation's senior military figures. It features archival footage and photographs of Fouad Shukr, as well as an official statement from Hezbollah's military wing describing him as one of its leading figures and a key contributor to the group's military capabilities, strength, and operational achievements.

2) **A social media post dated 16 October 2024:** This post states *"The Islamic Resistance begins the Tank Massacre[14]… and continues its heroic resistance to the Israeli ground*

[13] These posts are mainly in Arabic, and have been translated by Ofcom. For the avoidance of doubt, Ofcom has not carried out a comprehensive review of all of Lualua TV's social media posts from 2024, 2025 and 2026.
[14] Hamas also refers to the attacks it carried out in Israel on 7 October 2023 as the "Tank Massacre". Ofcom considers the more appropriate translation of the original post in Arabic is the "Resistance "begins"" rather than "inaugurates" as is shown in the automatically generated translation.

incursion #Lebanon #Palestine"), alongside a Lualua branded video report purportedly showing Hezbollah missiles targeting Israeli tanks. The Islamic Resistance is the military wing of Hezbollah, a proscribed organisation.

3) **A social media post dated 19 October 2024:** This post states *"The Islamic Resistance in #Lebanon fulfils its promise of escalation…. A drone explodes at Netanyahu's home in Caesarea"* with the hashtag "*Al Aqsa Flood*" alongside a Lualua branded video purportedly showing footage of the activities of Hezbollah's military wing against Israel, in which the narrator states *"The Islamic Resistance in Lebanon has launched a new phase in its fight against the enemy".*

4) **A social media post dated 28 September 2025:** This post states *"We shall triumph… we shall triumph. We become martyrs... we shall triumph… Syed Hassan Nasrallah, Bahrain, we remain true to our pledge. From the people of #We remain faithful to our pledge to the most sacred martyr #Sayyid Hassan Nasrallah"*. This is accompanied by a Lualua branded video of a well known devotional Arabic song/poem in support of Hezbollah and its former leader Hasan Nasrallah, that demonstrates support for Hezbollah, and the concept of armed resistance.

5) **A social media post dated September 28 2025:** This post states "*Here we are, alive despite the ruin – far from it, no, not when he is absent... From the people of #Bahrain to the holiest martyr. We remain true to our pledge Hassan Nasrallah."* This is accompanied by a video with a devotional song which is an elegiac and militant tribute to the deceased leader of Hezbollah, Hasan Nasrallah, positively portraying him as an incomparable figure whose influence endures beyond death.

6) **A social media post dated 27 September 2026**. This post states *"On the Day of the Ascent: The Nation Honors Its Master of Martyrs #Lebanon # We_Are_True_to_the_Covenant"*. This is accompanied by a video which marks the second anniversary of the death of Hassan Nasrallah, and reflects on his life, leadership and political legacy, featuring excerpts from his speeches alongside archival footage of him addressing audience. The video frequently praises Hassan Nasrallah. For example, it states *"When a nation condenses a history of dignity and honour into one man, and a presence becomes a school of thought that never departs, time itself stands in reverence before the moment of ascension"* and refers to his *"great legacy"*. It refers to *"the bitterness of the loss"* of Hasan Nasrallah. It also states *"The anniversary reaffirms that the men of resistance transcend the limits of positions and titles through the impact they leave behind, remaining beacons of example and gratitude. The commemoration comes laden with loyalty and the nation's adherence to the path of resistance. Men of destiny leave an influence that extends far beyond offices and designations".* The video also includes a recording of Hasan Nasrallah, saying *"We will continue on this path, even if we are all killed."*

1.72 We consider that the above posts demonstrate a pattern of behaviour by Lualua TV which expresses support for, promotes, glorifies or otherwise seeks to encourage support for the actions of proscribed terrorist organisations and their leaders.

Ofcom's duty to be satisfied

1.73 If a licensee expresses, or appears to express, support for, or promotes, glorifies or otherwise seeks to encourage support for, proscribed terrorist organisations in the UK, Ofcom cannot be satisfied that it is a fit and proper person to hold a broadcast licence.

There is clearly a strong public interest in the prevention of terrorism and the spread of terrorist ideology[15]. The potential for harm arising from terrorism and the spread of terrorist ideology is extremely high.

1.74 In the exercise of its functions, Ofcom must also have due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations between those who share a relevant protected characteristic, such as religion or belief, and those who do not[16]. As set out in the Code, hate speech or abusive and derogatory treatment of individuals, groups, religions, or communities must not be included in television or radio programmes except where it is justified by the context. We consider that the broadcast of hate speech (including antisemitic statements) carries a high risk of causing harm, and that a responsible broadcaster would not spread, or condone the spread of hate speech.

1.75 Ofcom must perform its duties in accordance with the right to freedom of expression set out in Article 10 of the European Convention on Human Rights. Freedom of expression is a fundamental human right and freedom. It constitutes one of the essential foundations of a democratic society and is one of the basic conditions for its progress and for the development of every person.

1.76 Ofcom recognises the importance of the broadcaster's right to freedom of expression and the audience's right to receive information and ideas without undue interference in our democratic society. We acknowledge that the right to freedom of expression encompasses the right of broadcasters to express themselves online, to report news from the Middle East, and to cover controversial subjects.

1.77 Any limitation on the right of freedom of expression, particularly political freedom of expression, must be strictly considered. As set out above, any limitation must be prescribed by law, pursue a legitimate aim and be necessary in a democratic society. In order to establish that a limitation is "necessary", relevant and sufficient reasons must be provided to justify the restriction, the restriction must correspond to a pressing social need, and it must be proportionate to the legitimate aim pursued.

1.78 Ofcom's concern is not that the Licensee reported on events in the Middle East, and the actions of Hamas, Hezbollah and Palestinian Islamic Jihad. Reporting on such matters is capable of attracting protection under Article 10 and forms an important part of public discourse. Rather, Ofcom is concerned that the material identified in this Decision appears in a number of instances to go beyond the reporting of events and is material which expresses support for, promotes, glorifies or otherwise seeks to encourage support for proscribed terrorist organisations. It also contained material that constituted hate speech and abusive and derogatory treatment towards Jewish people. Importantly, there was no editorial challenge, critical analysis or contextualisation of the views included in the livestream. The material considered in this Decision demonstrates a pattern of behaviour by the Licensee which we consider shows support for proscribed terrorist organisations.

1.79 For example, and in particular, the material included repeated praise for the attacks carried out by Hamas, a proscribed terrorist organisation, on 7 October 2023, which were described as an "*important, great and blessed operation*", a "*historical milestone*" a "*major leap forward*" and a "*successful, powerful, meticulously planned, and expertly executed*

[15] See R v BDN (Appellant); R v ABJ (Appellant), in particular paragraphs 103-104
[16] Under section 149 of the Equality Act 2010.

operation". The material further praised the consequences of those attacks, including by stating that they "*created an opportunity for the entire Islamic nation"* and that one of their *"major consequences*" had been "*the exposure of the entire Zionist system… its aggressive objectives, its satanic practices, its grave crimes, and its harmful agenda, which poses a danger to human society as a whole*."

1.80 The material also included repeated calls for support and assistance, referring to those who were not involved in the attacks a "*stance… of abandonment and failure to support by the majority, complicity by some, and serious commitment to advocacy, support, and assistance by only a few—that is, at a limited level within the framework of the Axis of Jihad and Resistance*" and that the "*blessed Al-Aqsa Flood operation… represented an opportunity for the whole nation to confront an enemy common to them all*" and "*yet what happened was regrettable: widespread abandonment and failure to support, accompanied by a considerable degree of complicity*".

1.81 In addition, the material contained extensive praise for organisations and individuals associated with proscribed terrorist organisations. This included positive references to the Al-Qassam Brigades and the Al-Quds Brigades, criticism of the classification of such groups as terrorists, and sustained praise for Hezbollah, its activities, its leaders and its role in supporting Palestinian armed groups.

1.82 We would expect a responsible broadcaster not to express support for, promote, glorify or otherwise encourage support for proscribed terrorist organisations. We are extremely concerned that the content described above which has been included in the Lualua TV service's livestream and on its social media account, is potentially harmful in nature and expresses support for, promotes, glorifies or otherwise encourages support for proscribed terrorist organisations and individuals associated with proscribed organisations and their activities.

1.83 Ofcom is also concerned by the positive presentation of individuals associated with Hezbollah, including references to Hassan Nasrallah as "*a martyr of Islam and humanity*", references to Imad Mughniyeh as "*one of Hezbollah's heroic military leaders*", and statements portraying Hezbollah as "*the largest and most important front in the nation*" supporting the Palestinian people.

1.84 The potential for harm arising from the spread of hate speech and terrorist ideology is extremely high.

1.85 As set out by the Supreme Court in *R v ABJ and BDN*: "*In particular, expressions of approval or endorsement of proscribed organisations are especially significant in the light of the growing tendency, mentioned earlier, for terrorist acts to be perpetrated by individuals who have been encouraged or inspired by material they have read or heard. In that context, the expression of opinions or beliefs which are supportive of proscribed organisations can have highly dangerous consequences.*"[17]

1.86 The broadcast of this type of material therefore poses a risk of very serious harm to audiences and to public safety.

1.87 Our concern is heightened by the manner in which the material was presented. The Abdul Malik al-Houthi speech was livestreamed continuously for approximately 45 minutes. Throughout the segment, a banner remained visible on screen stating: "*God is Greater.*

[17] [2026] UKSC 8, at paragraph 104

Death to America. Death to Israel. Curse the Jews. Victory to Islam". The statements identified above were therefore not isolated remarks made in passing, but formed part of a sustained and uninterrupted livestream in which viewers were exposed to extensive commentary praising the 7 October 2023 attacks, praising organisations and individuals associated with proscribed organisations and their actions, and criticising those who opposed them. There was no editorial challenge, critical analysis or contextualisation of the views included in the livestream. Ofcom also considers it significant that this material was made available through a service ostensibly branded as LuaLua TV. In Ofcom's view, the volume of such material, the manner in which it was presented and the apparent editorial choices made regarding its selection and transmission raise serious concerns about whether the Licensee can be relied upon to act as a responsible broadcaster.

1.88 Given the links between the Licensee and the extremely serious nature of the content streamed by the Lualua TV service on the Lualua TV website, and included on its associated social media account, we have serious concerns about whether the Licensee is able to act as a responsible broadcaster. We have serious concerns about whether, should it choose to broadcast the Lualua TV service or a similar channel on a regulated EPG in the future, such a service would comply with the requirements of the regulatory regime. Given this conduct we are consider that we are no longer satisfied that Shells for Media Productions Limited are fit and proper to hold a broadcasting licence.

1.89 We are also seriously concerned that, in its responses to Ofcom's information requests, the Licensee did not initially provide the Abdul Malik al-Houthi speech that formed part of the online live stream on 7 October 2026, despite the fact that it was able to provide the surrounding content. Even after Ofcom made two follow-up requests for the content as transmitted, it remained unclear whether the material had been provided in full.

1.90 The Licensee has not fully explained why the speech as broadcast was not identified and supplied in full in response to Ofcom's requests. Ofcom requested the relevant material pursuant to Condition 12(3) of the Licence, which requires the Licensee to provide such information as Ofcom may reasonably require for the purposes of carrying out its functions. Although Ofcom recognises that the Licensee was not under a separate obligation to retain recordings of the online live stream, this does not explain its failure to provide the broadcast of the speech in full, particularly given that recordings of the surrounding content were immediately available. Honest and full compliance with regulatory information requests is an important aspect of a licensee's ability to engage openly and transparently with its regulator, and is therefore relevant to Ofcom's assessment of whether the Licensee can be relied upon to act as a responsible broadcaster.

1.91 Ofcom is further concerned by discrepancies between material initially provided by the Licensee and the recording of the livestream later provided by the Licensee. The Licensee has not, to date, provided a satisfactory explanation for those discrepancies.

1.92 We are concerned that the initial provision of altered screenshots and withholding of the speech as broadcast tends to indicate that the Licensee was aware that the material was harmful and did not wish Ofcom to view the material as originally transmitted. The existence of those discrepancies, viewed together with the initial failure to provide the Abdul Malik al-Houthi speech as broadcast, raises significant concerns regarding the completeness and reliability of the Licensee's responses to Ofcom's enquiries. We consider that this also casts doubt on whether the Licensee has provided accurate recordings from 7 October 2026 with respect to the broadcast of the speech.

1.93 In Ofcom's view, a licensee's willingness and ability to provide complete and accurate information when requested pursuant to licence condition 12(3) is an is an important indicator of whether it can be relied upon to operate as a responsible broadcaster.

1.94 As noted above, Ofcom may have regard to non-broadcasting conduct where it considers that conduct is likely to undermine public confidence in the UK broadcasting regime.[18] In particular, Ofcom is concerned that the continued holding of a UK broadcasting licence by Shells for Media Productions Limited in respect of the LuaLua TV service risks undermining confidence in that regime in circumstances where the service has published extremely harmful content, including content which Ofcom considers expresses support for, promotes, glorifies or otherwise seeks to encourage support for proscribed terrorist organisations and acts of terrorism, without contextualisation or challenge.

1.95 Ofcom considers that members of the public would reasonably expect a person holding a UK broadcasting licence not to broadcast such extremely harmful content, nor be significantly linked or associated with the provision of such extremely harmful content, and that such a person is not a "fit and proper" person to hold a Broadcasting Act licence. Ofcom considers that the continued holding of a licence by a person in such circumstances is likely to undermine public confidence in the broadcasting regime as a whole.

1.96 The Licensee's streaming of uncontextualised and unchallenged hate speech containing abusive and derogatory treatment towards Jewish people and support for proscribed organisations on 7 October 2026, when considered alongside a pattern of social media activity by Lualua TV expressing support for the actions of proscribed terrorist organisations and their leaders, taken together with our concerns about the Licensee's lack of openness and transparency in its engagement with us, leads us to conclude that the Licensee cannot be relied upon to act as a responsible broadcaster. Accordingly we are not satisfied that the Licensee is fit and proper to hold a licence under the Broadcasting Act.

1.97 While we note that our decision to revoke the Licensee's licence constitutes a significant interference with the Licensee's Article 10 rights, we consider that this meets the requirements of Article 10(2) as being prescribed by law, in the pursuit of a legitimate aim, which include amongst other things, "in the interests of … public safety, for the prevention of disorder or crime, [or]… for the protection of … the rights of others" and necessary in a democratic society.

1.98 The 2003 and 1990 Acts and the Code are the applicable law for the purposes of Article 10(2). The legitimate aims pursued by the Acts and the Code are the interests of public safety, the prevention of disorder or crime, and the protection of the rights of others.

1.99 In considering the proportionality of our Decision, we note that Shells for Media Productions Limited is not, in any event, currently broadcasting on any regulated broadcast platforms in the UK under the Licence. The consequence of this revocation decision is that Shells for Media Productions Limited will not be able to broadcast a television service in the UK via a regulated EPG on satellite, cable or digital terrestrial television. It does not prevent the continued livestream of Lualua TV to audiences online.

1.100 Ofcom's duty to uphold standards protecting audiences from harm is central to our role as a broadcast regulator, and we consider our duty to be satisfied on an ongoing basis that

[18] *Harris v Registrar of Approved Driving Instructors* [2010] EWCA Civ 808, *R (Carlin) v Ofcom [2022]* NIKB 20, and *R (Avaaz Foundation) v Ofcom* [2018] EWHC 1973

broadcast licensees are fit and proper to hold licences is important in ensuring confidence in the broadcasting regime. Although the Licensee is not currently providing a regulated television service under the Licence, Ofcom's statutory obligation under section 3(3) of the 1990 Act to remain satisfied that persons holding broadcast licences are fit and proper to do so still applies.

Now therefore, Ofcom hereby revokes, with immediate effect, Licence number TLCS0011605 held by Shells for Media Productions Limited.

Date: 26 November 2026