

Sanction Decision by Ofcom

Decision: Sanction to be imposed on Loveworld Limited

For material broadcast on Loveworld Television Network (“Loveworld”) on 31 May 2024.

Ofcom’s Sanction Decision against:

Loveworld Limited (“LL”, “Licensee”) in respect of its service **Loveworld Limited** (TLC000787BA/1).

For:

Breach of the Ofcom Broadcasting Code (the “Code”)¹:

Rule 2.1: “Generally accepted standards must be applied to the contents of television and radio services [...] so as to provide adequate protection for members of the public from the inclusion in such services of harmful material”.

Ofcom’s Decision:

To impose a financial penalty (payable to HM Paymaster General) of £200,000; and

To direct the Licensee to broadcast a statement of Ofcom’s findings on a date and in a form to be determined by Ofcom.

¹ See [Ofcom Broadcasting Code](#).

Executive Summary

1. Loveworld is a religious television channel broadcast on satellite providing a service in the UK from an Evangelical Christian denomination with a global network of churches². The licence for the Loveworld service is held by Loveworld Limited (“LL” or “the Licensee”).
2. On 31 May 2024 at 22:30, the Licensee broadcast *Echoes of Truth* (“the Programme”), a discussion programme in which youth presenters discussed a range of topical issues with a focus on Christian teachings.

The Breach Decision

3. In Ofcom’s Decision (“the Breach Decision”) published on 31 March 2025 in Issue 519 of the Broadcast and On Demand Bulletin³, Ofcom found that the Programme contained potentially harmful statements about vaccines, including claims about vaccine safety and efficacy, without providing adequate protection to viewers, in breach of Rule 2.1 of the Code.
4. The Breach Decision sets out specifically the broadcast material that was in breach, along with reasoning as to why the material had breached the applicable rules of the Code.
5. Ofcom informed the Licensee that the initial view of the breach decision-maker was that the Breach Decision would be considered for the imposition of a statutory sanction. The Breach Decision stated that it considered that the breach was serious and – in light of the Licensee’s compliance history – repeated. Ofcom informed the Licensee that this was the initial view of the breach decision-maker and it would be reconsidered by the Sanction Panel.

The Sanction Decision

6. In accordance with Ofcom’s Procedures for the consideration of statutory sanctions in breaches of broadcast licences (the “Sanctions Procedures”)⁴, Ofcom has considered whether the Code breach was serious, deliberate, reckless or repeated so as to warrant the imposition of a sanction on the Licensee in this case.
7. Ofcom’s Preliminary View on sanction (“the Sanction Preliminary View”) set out that Ofcom was minded to impose a statutory sanction on the Licensee. Ofcom sent a copy of the Sanction Preliminary View to the Licensee on 3 March 2026 and gave it the opportunity to provide both written and oral representations. The Licensee provided written representations on 24 March 2026 which have been summarised in paragraphs 52 to 62.
8. Having considered the Licensee’s representations, Ofcom has reached the view that a sanction is warranted in this case, since the breach was serious and repeated, for the reasons set out in paragraphs 65 to 72 and paragraphs 73 to 77 respectively.
9. Ofcom’s decision is that the appropriate sanction should be to impose a financial penalty of £200,000, and to direct the Licensee to broadcast a statement of Ofcom’s findings on a date and in a form to be determined by Ofcom.
10. This document sets out Ofcom’s Sanction Decision, taking into account all the relevant material in this case and Ofcom’s Penalty Guidelines⁵.

Legal Framework

Communications Act 2003

² The Christian denomination, Loveworld Incorporated (also known as Christ Embassy) was founded by Pastor Chris Oyakhilome who is also its president. It runs seven television channels globally.

³ See Issue 519 of [Ofcom Broadcast and on Demand Bulletin](#), 31 March 2025.

⁴ See Ofcom’s [Sanctions Procedures](#).

⁵ See Ofcom’s [Penalty Guidelines](#).

11. Ofcom's principal duty, set out in section 3(1) of the Communications Act 2003 ("the Act"), is to further the interests of citizens in relation to communications matters and the interests of consumers in relevant markets. These objectives include 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 harmful material in such services (section 3(2)(e)).
12. Ofcom has a specific duty under section 319(1) of the Act to set such standards for the content of programmes in television and radio services as appears to it best calculated to secure the standards objectives set out in section 319(2).
13. Section 319(2)(f) requires that generally accepted standards are applied to the contents of television and radio services so as to provide adequate protection for members of the public from the inclusion in such services of offensive and harmful material. This requirement is reflected in Section Two⁶ of the Code.
14. In performing these duties, Ofcom is required to have regard to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed, and any other principles representing best regulatory practice (section 3(3)); and, where relevant, to have regard to a number of other considerations including the need to secure that the application, in the case of television and radio services, of standards relating to harm and offence is in the manner that best guarantees an appropriate level of freedom of expression (section 3(4)(g)).

Human Rights Act 1998

15. Under section 6 of the Human Rights Act 1998, Ofcom (as a public authority) must also act in accordance with its public law duties to act lawfully, rationally and fairly, and it has a duty to ensure that it does not act in a way which is incompatible with the European Convention on Human Rights (the "Convention"). In particular, in the context of this case, Ofcom has taken account of the rights under Article 9 and Article 10 of the Convention.
16. Article 9 of the Convention provides for the right to freedom of thought, conscience and religion, which includes the right to manifest one's religion or belief in worship, teaching, practice and observance (Article 9(1)). This Article makes clear that "freedom to manifest one's religion or beliefs shall be subject only to such limitations as are prescribed by law and are necessary in a democratic society in the interest of public safety, for the protection of public order, health or morals, or for the protection of rights and freedoms of others" (Article 9 (2)).
17. Article 10 of the Convention provides for the right to freedom of expression. Applied to broadcasting, this right encompasses the broadcaster's freedom to impart and the audience's freedom to receive information and ideas without interference by a public authority and regardless of frontiers (Article 10(1))⁷. It applies not only to the content of information but also the means by transmission or reception⁸. And while subject to exceptions, the need for any restriction must be established convincingly⁹. The exercise of these freedoms may be subject only to conditions and restrictions which are "prescribed in law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health and morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence or for maintaining the authority and impartiality of the judiciary" (Article 10(2)).

⁶ See: [Section Two of the Code](#).

⁷ *Lindens v Austria* (1986) 8 EHRR 407.

⁸ *Autronic v Switzerland* (1990) 12 EHRR 485.

⁹ *Steel & Morris v UK* (2005) EMLR 15.

18. Ofcom must exercise its duties in light of both these fundamental rights and not interfere with the exercise of these freedoms in broadcast services unless it is satisfied that the restrictions it seeks to apply are prescribed by law and are necessary in a democratic society to achieve a legitimate aim. The legitimate aim in this case is the protection of the rights of others, i.e. to provide adequate protection to audiences from harmful material in broadcast content.

Equality Act 2010

19. Under Section 149 of the Equality Act 2010, 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 persons who share a relevant protected characteristic, such as (but not limited to) religion, and persons who do not share it.

The Ofcom Broadcasting Code

20. Standards set by Ofcom in accordance with section 319 of the Act are set out in the Code.
21. Accompanying Guidance Notes¹⁰ to each section of the Code are published, and from time to time updated, on the Ofcom website. The Guidance Notes are non-binding but assist broadcasters to interpret and apply the Code. The relevant Code rules in this case are set out in full at the beginning of this Sanction Decision.

Remedial action and penalties

22. Under section 325 of the Act, a licence for a programme service issued by Ofcom under the Broadcasting Act 1990 or 1996 must include conditions for securing that the standards set under section 319 are observed by the licensee. In the case of a television licensable content service ("TLCS") licence, Condition 6 of the licence requires the licensee to ensure that provisions of any Code made under section 319 are complied with. The Licensee holds a TLCS licence (TLCS000787BA/1).
23. Where Ofcom has identified that a condition of a TLCS licence has been contravened, its powers to take action are set out in sections 236 to 239 of the Act. These provisions, insofar as they are relevant to the case, are summarised below.
24. Section 236 of the Act provides Ofcom with the power to direct the holder of a TLCS licence to broadcast a correction or a statement of Ofcom's findings (or both), and/or not to repeat a programme which was in contravention of a licence condition.
25. Section 237 of the Act provides Ofcom with the power to impose a financial penalty on the holder of a TLCS licence. The maximum penalty which may be imposed in respect of each contravention of a licence condition is whichever is the greater of £250,000 and five per cent of the qualifying revenue from the licenced service for the licensee's last complete accounting period falling within the period for which its licence has been in force.
26. Section 238 of the Act gives Ofcom a duty to revoke a TLCS licence if the licensee is in contravention of a condition of the licence or is failing to comply with a direction and Ofcom is satisfied that the contravention or failure, if not remedied, would justify the revocation of the licence.

Background - The Breach Decision

27. In the Breach Decision, Ofcom found that the broadcast of *Echoes of Truth* on Loveworld on 31 May 2024 was in breach of Rule 2.1 of the Code. The Breach Decision sets out specifically the broadcast material that was in breach, along with reasoning as to why the material had breached the applicable rule of the Code. It was published by Ofcom on 31 March 2025.

¹⁰ See: [Ofcom's Guidance Notes for Section Two of the Code](#).

28. The Breach Decision related to a complaint that Ofcom had received about an episode of *Echoes of Truth* from a complainant concerned that the Programme included “anti-vaccine views without challenge or balance” and allegations that “scientific research had found that vaccines were “never safe”. Ofcom investigated this material under Rule 2.1 of the Code.
29. The Licensee provided written representations during the investigation, which were taken into consideration by Ofcom when reaching the Breach Decision.
30. *Echoes of Truth* was produced by Global Youth Television Forum (GYTF) and was hosted by three youth presenters, who discussed various topical issues, including Pastor Chris Oyakhilome’s (“Pastor Chris”) “*message of the year*” regarding “*Redemption*” and matters relating to the Covid-19 pandemic. The presenters also discussed the World Health Organisation (“WHO”) and what they described as a failure to effectively manage the Covid-19 global pandemic. The Programme also had a segment called “*Debunking the Lies*” which related to the mandating of vaccine passports and included the presenters’ own views that these were a breach of human rights.
31. Approximately an hour into the Programme, the presenters introduced a documentary called “*Vaccine Intrusions: The HPV & Polio Story*” (“the Documentary”). This Documentary comprised footage taken from a variety of sources, including a range of different television programming, interviews with people who provided personal accounts of their vaccine experiences and clips taken from Pastor Chris’ sermons.
32. The Breach Decision took into account that the Documentary included serious claims which asserted that vaccines had been rolled out to populations without evidence of their efficacy and as part of a global agenda to achieve depopulation. For example:
- “*[N]o clear data has been produced, substantiated with scientific proof, evidence that vaccines actually work. There’s been none to this day*”;
 - “*Indeed, the world is beginning to find out the catastrophe that vaccines and vaccination enthusiasts have orchestrated since the introduction of vaccines to the world’s health system. But what many more now need to understand is that there has been an age long design to systematically inflict people with diseases in the hopes of achieving the depopulation agenda within a specific time frame*”;
 - “*...people must understand that behind all forms of vaccine mandates prevalent is the depopulation agenda. So, the globalists are wielding the weapon of vaccines to summarily engineer a massive depopulation within a specific age group and projected time frame*”;
 - “*I understand that in some countries as well, they say that they want to vaccinate the young people, especially young ladies, against cancer. Another big lie*”.
33. The Breach Decision also took into account the specific claims in the Documentary relating to the polio and HPV vaccines. For example:
- “*Polio vaccine is the largest cause of polio in the world*”;
 - “*The history of vaccination has spanned hundreds of years, replete with several fabricated and unscientific validations to assert its indispensability, but as well rattled with several stories of unprecedented ill health post-vaccination, especially in children*”;
 - “*If you were deceived before, don’t be deceived anymore. And those of you who have just had babies, you better be careful because Satan is more vicious today than he ever was because his time is short and he’s pushing them to get you vaccinated and get your babies vaccinated*”;

- *“You were deceived by the logic that if you, if you gave the person who was not sick, a little disease, you will become immune to that disease. It seems to make sense. But what we never asked ourselves was, what was the quality of the immunity before this so-called disease was passed into the person? And what was the measurement of his level of immunity after he got the vaccination? And what was the actual content of the vaccine? And what could have been in those vaccines that could have caused some other kinds of ailments or injuries? Did anybody check? Nobody checks”;*
- *“And suddenly, in certain societies in Africa and Asia, you have lots of crippled people. Suddenly so many with polio. Then we're told that, they're coming again for another vaccine against polio. Against polio? There was no polio in those societies until they were vaccinated. Check the history. Meaning the vaccines brought polio”;*
- *“When they test these kids. Why are they getting, why are they being paralysed? What they're finding is the virus that's paralysed them, or the polio, came from the vaccine itself. It has the fingerprint of the vaccine form of polio. So, in essence we essentially are causing polio outbreaks around the world”;* and
- *“Another very disruptive vaccine intrusion that has been pushed yet again under the disguise of preventing a certain type of cancer in young girls is the HPV vaccines. Different findings reveal the spike in cases of injuries to young girls who got injected with the HPV vaccines”.*

34. After the Documentary had finished, the presenters discussed what had been shown and made further statements which the Breach Decision considered supported these claims:

- *“Parents you should stand that way as well. Tell your daughters, your children, don't take any vaccine in school. Because they've come subtly to schools”;*
- *“They are using the schools. They are going to playgrounds, you know, they are doing a whole lot. They are doing a whole lot just to push their vaccines, you know, to champion their population reduction agenda”;* and
- *“Even those who were injured may not have linked it to the vaccine, but thought something else happened. But now they're realising that ‘oh my, my child is autistic and when did they [sic] happen? Right after she took the vaccine”.*

Potential harm

35. Ofcom first assessed the potential for harm. As set out above, Ofcom concluded that the Programme included numerous serious claims regarding the safety and efficacy of both the polio and HPV vaccines. The Breach Decision took into account that polio is a serious viral infection that can be potentially life threatening, particularly for young children. The polio vaccine is currently included in the NHS routine childhood vaccination schedule in the UK and is recommended by the health service as the best way of preventing polio¹¹. The HPV vaccine is currently recommended for children aged 12 to 13 and reduces the risk of getting human papillomavirus (HPV), a common virus that is spread through skin contact, usually when having sex, and which can cause several cancers including cervical cancer. NHS research suggests over time the HPV vaccine will help save thousands of lives in the UK¹².

36. As set out in Ofcom's Guidance to Section Two, when considering whether a programme which contains health claims has the potential for harm, Ofcom takes into account a number of factors, such as: the severity of the situation (i.e. whether the claims relate to the most serious medical conditions); whether the material was targeted at a particularly vulnerable audience; and whether the claims were made by a speaker who is portrayed as having authority. Ofcom's

¹¹ See NHS website: <https://www.nhs.uk/conditions/polio/>.

¹² See NHS website: <https://www.nhs.uk/vaccinations/hpv-vaccine/>.

Guidance to Section Two highlights the requirement for a higher level of protection from potential harm where claims are made about the most serious medical conditions, because the consequences of acting on advice relating to these conditions could be more significant. In this case, the Breach Decision concluded that both polio and cervical cancer are among the most serious medical conditions and that the decision as to whether or not to take up either vaccine had the potential to carry significant health implications. Furthermore, as these vaccinations are given to children, it is vital that parents and carers are able to make properly informed choices on behalf of children in their care based on appropriately presented and contextualised information.

37. The Breach Decision underlined the importance of broadcasters having the freedom to debate significant issues such as public health policies. It also acknowledged that there are rare cases of vaccine-derived polio¹³, and evidence that vaccinations have caused serious side effects in some individuals. However, Ofcom concluded that the Programme presented serious vaccine injuries – which it said included paralysis and autism – as widespread and endemic.
38. The Breach Decision took into account that the Programme included numerous serious claims regarding the safety and efficacy of the polio and HPV vaccines, and it considered it had the potential to influence viewers’ decisions about vaccinations, which in turn could have significant consequences for their health and the health of their families. Ofcom therefore concluded that the health claims broadcast during the Programme had the potential to cause harm to audiences.
39. The Breach Decision considered that the impact of these claims had been further increased by accusations levelled at those providing vaccine programmes (including governments and medical organisations) who were said to be engineering “*a massive depopulation agenda*”. The Breach Decision also took into account the potentially harmful claims were either made or endorsed by Pastor Chris, a figure of religious authority to viewers and regularly referred to by the presenters as “*our man of God*”. Ofcom’s Guidance to Section Two explains that if potentially harmful health claims are made by a speaker who is perceived by the audience as having authority, then there is more chance of them treating these claims as credible and making decisions based on them. Furthermore, Ofcom’s research indicates that potential for harm in religious programming is high¹⁴.
40. The Breach Decision also considered there were direct appeals to parents and carers during the Programme which further increased the potential harm as parents were openly encouraged to act on the information presented. Over the course of the Programme, Ofcom considered that there was an absence of any opposing views, challenge or proper contextualisation to the serious claims.
41. Ofcom took account of the representations from the Licensee that it aims to provide educational and spiritually enriching content rooted in Christian teachings and is “deeply committed to presenting Christian teachings and values through a lens that emphasises historical and cultural education”. The Breach Decision emphasised while the Code does not prohibit programming which reflects the values and teachings of a particular religious community, such content must still be compliant, and audiences must be appropriately protected from potentially harmful material.

Adequate protection

¹³ See Polio Eradication website: <https://polioeradication.org/about-polio/the-virus/vaccine-derived-polioviruses/>.

¹⁴ Ofcom has published research [Health and wealth claims in programming: audience attitudes to potential harm](#), setting out audience views on the potential harm arising from programmes involving health or wealth claims.

42. Ofcom then examined whether the Licensee had taken steps to provide adequate protection to viewers in accordance with Rule 2.1 of the Code.
43. The Breach Decision highlighted the importance of broadcasters recognising that in order for protection to be adequate, the level of audience protection should be commensurate with the level of potential harm. As set out in Ofcom's Guidance to Section Two, there are various methods broadcasters can consider when making editorial decisions about how adequate protection might be achieved. For example, appropriate challenge by a presenter or other guests. Ofcom took into account the expectations of Loveworld viewers and the aims of the channel to "provide educational and spiritually enriching content rooted in Christian teachings" and the channel's claim that it strives to "offer multiple viewpoints in our religious programming, promoting respectful and thoughtful exploration of religious subjects".
44. However, in this case, Ofcom was very concerned that the claims regarding vaccine safety made in the Documentary and during the Programme were presented unchallenged, with the support of the studio presenters and without any other contextualising content or scientific scrutiny. While the Breach Decision identified one reference in the Documentary which suggested to viewers that they should "*listen to everything and then...choose. What you do is your responsibility*", it did not consider this singular phrase to constitute sufficient challenge or balance to the entirety of the remainder of the Programme.
45. During the investigation, LL raised concerns with Ofcom about "potential disproportionate scrutiny" given the previous sanctions which Ofcom had imposed. The Breach Decision explained to the Licensee that Ofcom was alerted to the content by a viewer complaint and underlined that it applies the Code in a balanced and impartial manner and without discriminating between licensed services. The Breach Decision also took account of LL's representations that it "fully complies with the Ofcom Broadcasting Code" and applies "standards that respect both local and global religious broadcasting norms".
46. Ofcom also acknowledged, that in response to Ofcom's Preliminary View, the Licensee said it had broadcast a formal apology for the content on 13 December 2024 at 11:00 and again at 22:30. While Ofcom welcomed the Licensee's public acknowledgement of the issues and its decision to broadcast this statement during the same time slots as the original broadcast, we did not consider the public statement broadcast served to provide adequate protection to the audience from the potential harm caused by the original Programme (paragraphs 35 to 49).
47. Taking account all of the factors set out above and detailed in full in the Breach Decision, Ofcom considered the harmful claims were presented to the audience by figures of authority without any further information to substantiate, challenge or otherwise appropriately contextualise them. Ofcom's Breach Decision therefore concluded that the Licensee had not provided adequate protection to viewers from the potentially harmful material in the Programme, in breach of Rule 2.1 of the Code.
48. The Breach Decision also stated that Ofcom was particularly concerned that Loveworld had incurred another breach of Rule 2.1, its fifth breach of this Code rule since June 2020, and following Ofcom's imposition of a statutory sanction in December 2022 for the broadcast of potentially harmful content in September 2021 (paragraph 120). Ofcom said it was a matter of great concern that this breach of Rule 2.1 had occurred despite the previous assurances made by the Licensee to Ofcom regarding its improved compliance procedures. Given the circumstances of this case, Ofcom's breach decision-maker's initial view was that this breach was serious and – in light of the Licensee's compliance history – repeated.¹⁵

¹⁵ Loveworld had previously been sanctioned for breaches of Rule 2.1 (and other Code rules): Please see Ofcom's sanction decisions for [Notice of Sanction Your Loveworld](#) published in December 2022, [Notice of](#)

49. Ofcom informed the Licensee that the initial view of the breach decision-maker was that the breach would be considered for the imposition of statutory sanction and that this view would be reconsidered by the Sanction Panel.

Ofcom's Sanction Preliminary View

50. Ofcom's Sanction Preliminary View set out that Ofcom was minded to impose a statutory sanction on the Licensee, in the form of a financial penalty and a direction to broadcast on its service a statement of Ofcom's findings.
51. In accordance with the Sanctions Procedures, Ofcom provided the Licensee with its Sanction Preliminary View and gave the Licensee the opportunity to make both oral and written representations to Ofcom. The Licensee provided written representations to Ofcom on 24 March 2026.

Licensee representations

52. Loveworld said it appreciated Ofcom's detailed assessment and the opportunity to further strengthen its commitment to the Code, and said it maintained its "right to freedom of thought, conscience and religion, alongside [its] right to manifest religion or beliefs as set out in Article 9 of the ECHR".
53. In its representations both during the investigation and at sanction stage, LL said it was invaluable to "fully understand Ofcom's expectations in greater detail, and in identifying additional measures required by Loveworld to prevent similar issues in future". It "recognise[d] that previous challenges have highlighted areas for improvement" and that "over the past several years [it has] worked diligently to strengthen [its] compliance processes, ensuring that Loveworld continues to meet the expectation of the Broadcasting Code".
54. LL also said at both the investigation and sanction stage that it appreciated Ofcom's analysis and in particular its "recognition of the importance of balancing [its] rights under Articles 9 and 10 of the European Convention on Human Rights with [its] responsibility to protect audiences". It explained that this has "further informed [its] approach to aligning faith-based programming with the requirements of the Broadcasting Code".
55. LL said that since the broadcast of the Programme, "new findings (both internationally and domestically) have emerged, further supporting the statements shared on the programme". It "strongly suggest[ed]" a further opportunity to provide written and oral representation in which to outline these new findings providing "overwhelming and mounting evidence in support of the statements made regarding the COVID-19, Polio, and HPV vaccines". It said that these "new findings" would prove it did not intend to cause harm but to "provide a balanced and informative response to the opposing mainstream narrative" and said it would "welcome further representation with Ofcom to discuss these new findings and [their] programmes over the past year and a half".¹⁶
56. In its representations, LL specifically addressed Rules 2.1 and 4.6¹⁷ of the Code and the "general commentary" that the Programme did not have sufficient challenge or balance. LL said that following the programme in question and similar cases at the time, "several steps have been taken to address these concerns". It said that this is evidenced by "later programmes that reflect

[Sanction Full Disclosure](#) published in October 2021, [Notice of Sanction Global Day of Prayer](#) published in April 2021 and [Loveworld News and Your Loveworld Sanction Decision](#) published in June 2020.

¹⁶ Ofcom explained to the Licensee that we could not revisit any aspect of the Breach Decision but gave Loveworld another opportunity to meet with Ofcom to provide oral representations to discuss the Sanction Preliminary View. The Licensee did not respond to Ofcom's request by the deadline and therefore the Panel had only the Licensee's written representations available to it when it reached the Sanction Decision.

¹⁷ Ofcom did not find the Programme in breach of Code Rule 4.6.

a higher level of impartiality and balanced reporting”. It also said that audiences are “often encouraged to engage in their own research so they can make informed decisions”.

57. In its representations received during the investigation and at sanction stage, Loveworld explained in relation to its compliance with Rule 2.1 that its content strategy is “deeply committed to presenting Christian teachings and values through a lens that emphasises historical and cultural education”, and that “it is designed to enrich understanding without provoking or offending”. Under the heading ‘Legal and Regulatory Framework’, it set out the following:

- “Human Rights Act 1998: This Act incorporates the European Convention on Human Rights into UK law, particularly Article 10, which safeguards the right to freedom of expression. This fundamental right supports the dissemination of religious ideas and beliefs through broadcasting, balanced against public safety in the European Court of Human Rights decision *Animal Defenders International v. United Kingdom* [2013]”.
- “Article 9 of the ECHR: Ensures freedom of thought, conscience, and religion, including the right to manifest one’s religion or beliefs. Our broadcasting of religious content directly manifests these rights, enabling the expression of religious views and the facilitation of public discourse on faith”.
- “Communications Act 2003: We adhere to the principles set out in this act, emphasising the importance of freedom of expression in broadcasting, thereby supporting our ability to engage audiences in meaningful religious discussions”.
- “Ofcom Broadcast Bulletin Precedents: Decisions such as the one regarding *Jerry Springer: The Opera*¹⁸ demonstrate Ofcom’s recognition of the importance of context and artistic expression, allowing controversial content when appropriately contextualised”.

58. Loveworld also explained how it complied with Rule 4.6¹⁹ of the Code, stating it maintained rigorous editorial standards to “ensure [its] religious programming respects, rather than exploits, audience susceptibilities”. It said it tried to offer multiple “viewpoints in [its] religious programming, promoting respectful and thoughtful exploration of religious subjects”, that it exercised “strict editorial control to prevent exploitation” and that “effective feedback systems are in place to monitor and adjust content based on viewer responses”.

59. At the sanction stage, LL repeated its previous representations which had been provided to Ofcom during the investigation to explain the measures it had taken to improve compliance. It said it had immediately undertaken a “comprehensive review of its editorial processes and programming practices” and provided Ofcom with information about the introduction of the following initiatives:

- Enhanced editorial oversight: the introduction of a multi-tiered editorial review process for all content which addressed public health and sensitive topics. It said this ensures that all claims are backed up with robust evidence from credible sources, that alternative views or expert commentary are presented to audiences to provide balance, and clear editorial guidance is provided to presenters to outline how to frame claims appropriately.

¹⁸ See [Ofcom Broadcast Bulletin Issue number 34 published 9 May 2005](#).

¹⁹ Rule 4.6 is not relevant in this case as we did not find the Programme in breach of this Code rule (see paragraph 47 above).

- Audience-specific protections: LL said it recognised the faith-based nature of its audience and had introduced viewer resources alongside disclaimers for contentious topics. It said this included links to reputable external information, such as public health resources and explicit disclaimers advising viewers to seek professional advice for health-related matters.
- Training for senior staff and presenters: LL said that it carried out in-person compliance training sessions between 11 and 17 November 2024 for all of its senior staff, presenters and producers involved in the Programme and other Loveworld programmes of this nature. It said that these sessions included workshops tailored to address Ofcom’s feedback and the practical application of Rule 2.1 and best practices for contextualising sensitive topics and balancing faith-based perspectives with evidence-based information. It said it had already led to a better understanding among its staff of how to handle potentially contentious subjects responsibly.
- Improved monitoring and feedback mechanisms: LL explained that it has improved its audience feedback systems to identify and address concerns more swiftly. It said it was also monitoring viewer feedback to ensure it met its audience’s needs and expectations.
- Quarterly compliance audits: the introduction of quarterly compliance audits to review content and processes. It said that these audits would ensure improvements are sustained over the long term.

60. LL said the above measures “demonstrate[d] [its] dedication to addressing Ofcom’s concerns comprehensively and ensuring future compliance” and that it viewed this process as an “opportunity to refine [its] practices and reaffirm [its] commitment to serving [its] audience with content that is accurate, balanced and respectful”.

61. LL also repeated that it “sincerely apologise[d] for any distress or confusion caused by the content of this broadcast”. It said that a “formal apology aired on 13 December 2024 at 11:00 and 22:30, the same time the episode of *Echoes of Truth* aired, which reflects [its] commitment to acknowledging these concerns publicly and demonstrating [its] accountability to viewers and regulatory authorities”.

62. In its representations, Loveworld emphasised to Ofcom that it objected to the proposed financial penalty set out in the Sanction Preliminary View which it considered to be “grossly disproportionate to reported breaches of the Broadcasting Code”. It also reiterated its “concerns about potentially disproportionate scrutiny”²⁰ and asked for assurance that regulatory actions are balanced and impartial, as it “cannot afford further statutory sanctions”.

Ofcom’s Decision to impose a Statutory Sanction

63. As set out in paragraph 1.13 of the Sanctions Procedures, the imposition of a sanction against a broadcaster is a serious matter. Ofcom may, following due process, impose a sanction if it considers that a broadcaster has seriously, deliberately, recklessly or repeatedly breached a relevant requirement.

64. We set out below Ofcom’s Sanction Decision that it is appropriate to impose a statutory sanction and the type and level of sanction Ofcom considers should be imposed. In reaching its Decision, Ofcom has taken into account all relevant material, including the Licensee’s representations, and Ofcom’s Penalty Guidelines²¹.

Serious nature of the breaches

²⁰ See paragraph 45 above.

²¹ See footnote 5.

65. In accordance with the requirements set out in paragraphs 15 to 17, Ofcom had regard to Articles 9 and 10 of the Convention when reaching a Decision on whether to impose a statutory sanction, including whether the breach in this case was serious. Ofcom must balance the audience's rights under the Convention with its primary responsibility to protect audiences from harmful content. As outlined in paragraph 36 above, and in the Breach Decision, Ofcom takes several factors into account in considering the potential for harm in a programme which contains health claims. These factors include: the severity of the situation (i.e. whether the claims relate to the most serious medical conditions); whether the material was targeted at a particularly vulnerable audience; and whether the claims were made by a speaker who is portrayed as having authority. Based on these factors, Ofcom is likely to consider breaches involving harm in relation to health or wealth advice and claims to be serious.
66. Ofcom considered this breach was serious because, as set out in paragraphs 35 to 49, the Programme contained serious and potentially harmful claims relating to vaccine safety and efficacy without providing adequate protection to the audience. In doing so, the Programme had the potential to influence viewers' decisions about vaccinations, including vulnerable viewers, which in turn could have significant consequences for their health and the health of their families. Ofcom took into account that the claims in this Programme related to the most serious medical conditions. As set out in paragraphs 32 to 35, the Programme contained numerous serious claims regarding the safety and efficacy of the polio and HPV vaccines. Polio is a serious viral infection that can be potentially life threatening, particularly for young children. The HPV vaccine, given to children aged 12 to 13, reduces the risk of contracting human papillomavirus which is a common virus spread through skin contact, and which can cause several cancers including cervical cancer. Ofcom considered both polio and cervical cancer to be among the most serious medical conditions and therefore the decision as to whether or not to take up either vaccine had the potential to carry significant health implications. The Programme further claimed that vaccine programmes (including governments and medical organisations) had a "*massive depopulation agenda*" and presented serious vaccine injuries - which is said included paralysis and autism - as widespread and endemic.
67. Ofcom considered the authority of the speaker to be an important factor in determining the severity of the potential harm from the claims made. Ofcom's research found the potential for harm in religious programming to be high as audiences are more inclined to believe in the authority of the speaker and therefore advice might be highly influential among a targeted and potentially vulnerable audience²². Ofcom Guidance to Section Two also explains that if potentially harmful health claims are made by a speaker who is perceived by the audience as having authority, then there is more chance of them treating these claims as credible and making decisions based on them.
68. In this case, as set out in paragraph 39, these potentially harmful claims were either made or endorsed by Pastor Chris, a figure of authority to viewers of this channel, who was regularly referred to by the presenters as "*our man of God*". Ofcom considered the direct appeals to parents and carers to be particularly serious and that these further increased the potential harm, as parents were encouraged to act on the information presented. Ofcom also took into account there was an absence of contextual information in the Programme which may have protected the audience from potential harm – for example, the Programme did not include any alternate views or information, challenge or proper contextualisation to the serious claims made. We therefore considered that there was more chance of audiences treating these claims as credible and making decisions based on them, especially among any vulnerable viewers.
69. In considering the seriousness of the breach, Ofcom acknowledged that Loveworld is a channel which aims to "provide educational and spiritually enriching content rooted in Christian

²² See footnote 14.

teachings” and gave careful consideration to the Licensee’s Article 9 and 10 rights. However, these rights do not remove LL’s obligations under the Code to provide adequate protection to audiences, especially in relation to important and serious matters such as health claims. Given the factors outlined in the Breach Decision and above in paragraphs 32 to 46, we considered that the content in this Programme went beyond proclamations of faith and religious teachings and practices. Ofcom was particularly concerned in this case given the Programme presented multiple serious, potentially harmful, claims about matters of particular importance to people’s health, without providing adequate protection to audiences.

70. Ofcom took into account the Licensee’s representations regarding its “right to freedom of thought, conscience and religion, alongside [its] right to manifest religion or beliefs as set out in Article 9 of the ECHR”. While Ofcom acknowledged these rights, they do not remove the Licensee’s obligations under the Code to provide adequate protection to viewers from potentially harmful claims about health. The Code does not restrict religious channels from including teachings founded in their faith and we acknowledged the Licensee’s representations that the basis of the content on Loveworld “directly manifests these rights, enabling the expression of religious views and the facilitation of public discourse on faith”. Ofcom underlines the importance of the rights set out in the ECHR and will only restrict these rights where necessary and proportionate in order to ensure that audiences are adequately protected from potential harm.
71. Ofcom noted LL’s acknowledgment of Ofcom’s concerns regarding the programme in relation to Rule 2.1 and its statement that it “understand[s] the need to protect audiences from potentially harmful material and to ensure claims presented in programmes are substantiated, balanced, and contextualised”. However, as set out in paragraph 55, Loveworld also said “new findings (both internationally and domestically) have emerged” which it said further supported the statements made in the Programme, including that these findings demonstrated “overwhelming and mounting evidence in support of the statements made regarding the COVID-19, polio, and HPV vaccines”. In our view, despite Loveworld’s acknowledgement of Ofcom’s concerns and its position that it understood the requirement to protect audiences from potential harm, these representations indicated that the Licensee had not fully understood the basis on which Ofcom found the Programme in breach of Rule 2.1, nor the seriousness of the breach and potential harm to audiences.
72. In its representations, Loveworld raised “concerns about potentially disproportionate scrutiny” by Ofcom and asked for an “assurance that regulatory actions are balanced and impartial”, as they “cannot afford further sanctions”. As set out in the Breach Decision, Ofcom was alerted to the content by a viewer complaint and applies the Code in a balanced, consistent and impartial manner. In view of all the factors, Ofcom considered that the breach was serious.

Repeated nature of the breaches

73. Since 2020, Ofcom has imposed four sanctions on the Licensee for previous breaches of Rule 2.1. The full details of each case is set out in paragraphs 118 to 128.
- *Your Loveworld* (4 September 2021). The most recent sanction – published in December 2022 – related to the broadcast of *Your Loveworld* which was found in breach of Rules 2.1 and 4.6. Ofcom imposed a financial penalty of £15,000 and a direction to broadcast a statement of Ofcom’s findings.²³
 - *Full Disclosure* (11 and 12 February 2021): Ofcom’s sanction decision was published in October 2021 - on the Licensee for two episodes of *Full Disclosure* which were found in

²³ See [Notice of Sanction Your Loveworld](#) published in December 2022.

breach of Rules 2.1 and 2.2. Ofcom imposed a financial penalty of £25,000 and a direction to broadcast a statement of Ofcom's findings.²⁴

- *Global Day of Prayer* (1 December 2020): Ofcom's sanction decision was published in March 2021 for the *Global Day of Prayer* broadcast which was found in breach of Rules 2.1 and 5.1. Ofcom imposed a financial penalty of £125,000 and a direction to broadcast a statement of Ofcom's findings.²⁵
- *Loveworld News, Your Loveworld* (7 April 2020): Ofcom's breach decision and sanction decision were published together in May 2020 for the two programmes *Loveworld News* and *Your Loveworld* which were found in breach of Rules 2.1 and 5.1. Ofcom imposed a direction to broadcast a statement of Ofcom's findings.²⁶

74. As set out above, Ofcom took into account that the four sanctions involved breaches of Rule 2.1 and the broadcast of potentially harmful content which involved claims or advice about matters related to health without adequate protection to audiences. The most recent sanction related to the broadcast of *Your Loveworld* which was found in breach of Rules 2.1 and 4.6. Ofcom concluded that this programme solicited donations on the basis of religious faith with claims they would improve the donor's health, wealth and success. In relation to the breach of Rule 2.1, Ofcom found that statements in the programme were potentially harmful, and that the Licensee failed to provide adequate protection for viewers.

75. Ofcom noted in LL's representations on the Sanction Preliminary View that it outlined how it complied with Rule 2.1 and that "several steps have been taken to address these concerns". However Ofcom has previously received similar assurances from the Licensee and despite those repeated assurances, the Licensee has subsequently gone on to breach Rule 2.1 of the Code.

76. Ofcom is therefore particularly concerned that the broadcast of *Echoes of Truth* in May 2024 is the fifth breach of Rule 2.1 since 2020. This recurrence demonstrates an ongoing failure by the Licensee to provide adequate protection to the audience from the inclusion of the potentially harmful material, in this case, in relation to vaccine efficacy.

77. Taking into account these circumstances, Ofcom considered that there were sufficient similarities to conclude that this case did represent a clear recurrence of earlier Rule 2.1 breaches. Therefore, Ofcom considered that the breach was repeated.

Deliberate and/or reckless nature of the breaches

78. Ofcom considered whether the breach amounted to a deliberate and/or reckless act. As noted in paragraph 73 above, Ofcom took into account that we have imposed four previous sanctions on the Licensee and the breach which is the subject of this sanction consideration is the fifth recorded breach of Rule 2.1 since 2020.

79. Ofcom therefore considered LL's senior management ought to have understood and anticipated the potential issues raised under the Code by the broadcast of the Programme on an Ofcom-licensed service. Notwithstanding Ofcom's enforcement action against LL specifically, Ofcom has published several harm related investigations against other Licensees in recent years (paragraphs 133 to 138). In particular, Ofcom considered the Licensee ought to have understood and been aware of the need to provide adequate protection from audiences from potentially harmful content to comply with Rule 2.1.

²⁴ See [Notice of Sanction Full Disclosure](#) published in October 2021.

²⁵ See [Notice of Sanction Global Day of Prayer](#) published in April 2021.

²⁶ See: [Decision by Ofcom's Sanction Panel Your Loveworld](#) published in June 2020.

80. We noted that during the course of Ofcom's previous enforcement action there had been engagement between LL and Ofcom about the need for the Licensee to improve its compliance procedures (paragraphs 118 to 127). In particular, Ofcom highlighted the importance of ensuring that statements and claims relating to public health matters are appropriately contextualised in a way that provides adequate protection for the audience.
81. While Ofcom considered the breach represented a particularly serious and repeated failure of compliance, on balance, our Decision is that the breach in this case did not go as far as to constitute a reckless act by the Licensee. Furthermore, there is no evidence available to Ofcom to indicate that the Licensee broadcast this Programme with the intention to breach the Code. Ofcom's Decision is therefore that the breach was not deliberate.

Ofcom Decision on the appropriate sanction

82. Ofcom considered which of the sanctions available to it were appropriate in the present case. The following paragraphs set out the enforcement action we have considered and the sanctions we have decided to impose.

Imposition of sanctions other than a financial penalty

Revocation of a licence

83. Section 238 of the Act provides Ofcom with the power to revoke a TLCS licence where a licensee is failing to comply with a condition of such a licence or a direction thereunder and the failure, if not remedied, is such as to justify revocation of the licence. Ofcom must also be satisfied that it is necessary in the public interest to revoke the licence.
84. Given the potentially harmful statements made within the programme without providing adequate protection to viewers, Ofcom considered the breach to be serious. We also considered the breach to be repeated given this was the Licensee's fifth Code breach involving Rule 2.1 since 2020. Consequently, Ofcom gave serious consideration as to whether revocation of LL's licence would be a proportionate sanction in this case.
85. When considering whether to propose the revocation of a licence, Ofcom must have regard to the broadcaster's and the audience's respective rights. Ofcom must not act in a way which is incompatible with the Convention rights of the audience and broadcaster. Ofcom recognises that revocation 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 – in particular, in the context of this case, in relation to religious programming and the right to freedom of thought, conscience and religion under Article 9. Nevertheless, with regards to the audience's rights, revoking a licence is a way for Ofcom to secure the application of standards that provide adequate protection to members of the public from the inclusion of harmful material in television and radio services. Revocation is the ultimate enforcement action available to Ofcom and there is therefore a high threshold for revoking a licence.
86. Ofcom took into account the Licensee's representations given to Ofcom during the investigation and Sanction Preliminary View (paragraphs 52 to 62). We also took into account that LL had previously made assurances that it had made material changes to its compliance processes and training following previous sanction procedures, and that those procedures had been instigated for breaches involving inaccurate or uncontextualised statements and claims relating to public health matters, which reflects the circumstances of the present case. Despite those representations and assurances, Ofcom remains extremely concerned it has recorded another breach of Rule 2.1 against LL indicating to Ofcom that these compliance failures have not been addressed appropriately. We consider this represents a significant compliance failure by the Licensee and one which has followed four other serious compliance failures since 2020.

87. However, a decision to revoke a licence may only be taken by Ofcom if it is satisfied that it is a proportionate response to the licensee's failure to comply with its licence conditions. Any sanction we impose must be proportionate, consistent and targeted only at cases where action is needed. A relevant factor for Ofcom to consider in this regard is whether any sanction short of revocation could ensure that the Licensee would, in future, comply with the Code.
88. As set out in paragraph 25, the maximum penalty which may be imposed in respect of each contravention of a licence condition is whichever is the greater of £250,000 and five per cent of the qualifying revenue from the licenced service for the licensee's last complete accounting period falling within the period for which its licence has been in force. Since 2020, following sanction proceedings, Ofcom has imposed three financial penalties on Loveworld (paragraph 73) which all included breaches of Rule 2.1. In December 2022, we imposed a financial penalty of £15,000 for breaches arising from the broadcast of *Your Loveworld*, in October 2021 we imposed a financial penalty of £25,000 for the breaches arising from the broadcasts of *Full Disclosure* and in March 2021, we imposed the largest financial penalty against Loveworld of £125,000 for breaches arising from the broadcasts of *Global Day of Prayer*. Consequently, a relevant consideration in this case is that Ofcom has the ability to consider a higher penalty up to the maximum financial penalty that may be imposed for a contravention of a licence condition.
89. As described above, we remain concerned that there has been a series of similar breaches since 2020 and that measures LL says it has taken to improve compliance to date have failed to prevent a further breach. While it would be open to Ofcom to consider revoking the licence in this case, we have given careful consideration to the impact on the broadcaster's and audience's rights under Articles 9 and 10 of the Convention as discussed above. Taking this, together with our ability to impose a significantly higher penalty which could act as a deterrent against future breaches, we have decided on balance that it would not be appropriate on this occasion to revoke the licence. However, Ofcom would like to make it clear that the Licensee's rights under Articles 9 and 10 are qualified rights and we have an ongoing regulatory duty to protect audiences from potential harm. As such, Ofcom underlines the importance of future compliance with Rule 2.1 and that any further failure to comply could result in Ofcom giving serious consideration as to whether such a contravention, if not appropriately remedied, would justify revocation of a licence.

Direction to licensee to take remedial action

90. Ofcom went on to consider whether another form of sanction was appropriate in this case. Section 236 of the Act provides Ofcom with the power to direct the holder of a TLCS licence to broadcast a correction or a statement of Ofcom's findings (or both).
91. The purpose of directing a licensee to broadcast a statement of Ofcom's findings in relation to harmful breaches is to inform audiences of Ofcom's findings and ensure they are aware of the specific way in which the programme breached the Code.
92. It is Ofcom's Decision that directing the Licensee to broadcast a statement of Ofcom's findings would be necessary to bring the breach, and Ofcom's action in response to this breach, to the attention of LL's audience.
93. As set out in paragraph 46, Ofcom acknowledged that the Licensee said it had broadcast a formal apology for the content on 13 December 2024 at 11:00 and again at 22:30. While Ofcom welcomed LL's public acknowledgment of the issues we had raised about this Programme, we did not consider the public statement broadcast was sufficient to provide protection to the audience from the potential harm caused by the original Programme.
94. Ofcom also considered that, on its own, a direction to broadcast a statement of Ofcom's findings would not adequately reflect the level of seriousness of the breach in this case or provide sufficient deterrence to the Licensee, or other broadcasters, from repeating similar breaches of

the Code in the future. As such, Ofcom's Decision is that a further sanction should be imposed to act as an effective deterrent and to incentivise compliance, this is set out in the paragraphs below.

Imposition of a financial penalty

95. Section 237 of the Act provides Ofcom with the power to impose a financial penalty on the holder of a TLCS licence.
96. As noted previously, the maximum penalty that can be imposed on the holder of a TLCS licence in respect of each contravention of a TLCS licence condition is the greater of either £250,000 or five per cent of the qualifying revenue from the licensed service for the licensee's last complete accounting period falling within the period for which its licence has been in force.
97. For the purposes of determining the maximum penalty in this case, Ofcom requested financial data setting out its qualifying revenue for the last accounting period from the Licensee. The Licensee provided a qualifying revenue figure of [§<CONFIDENTIAL]. Based on the figure provided by the Licensee, the maximum penalty that Ofcom could impose in this case is [§<CONFIDENTIAL].
98. Ofcom's Penalty Guidelines²⁷ state (at paragraph 1.11) that: "Ofcom will consider all the circumstances of the case in the round to determine the appropriate and proportionate amount of any penalty. The central objective of imposing a penalty is deterrence. The amount of any penalty must be sufficient to ensure that it will act as an effective incentive to compliance, having regard to the seriousness of the infringement. Ofcom will have regard to the size and turnover of the regulated body when considering the deterrent effect of any penalty.
99. In this case, Ofcom's Decision is that a financial penalty is necessary to reflect the serious and repeated nature of the Code breach recorded against the Licensee, and to act as an effective incentive to comply with the Code, both for the Licensee and other Ofcom licensees (see paragraph 1.4 of the Penalty Guidelines).

Factors taken into account in determining the sanction penalty

100. In considering the appropriate amount of a financial penalty for the Code breach in this case, Ofcom has taken account of the specific relevant factors set out at paragraph 1.12 of the Penalty Guidelines. These factors are addressed in turn below.

The seriousness and duration of the contravention

101. Ofcom regarded the breach to be serious for the reasons set out in paragraphs 65 to 72 of this Sanction Decision.
102. Ofcom took into account that the Breach Decision involved one programme broadcast on 31 May 2024 and to the best of Ofcom's knowledge the duration of the contravention was limited to this broadcast. We are unaware of the Programme having been broadcast again.

The degree of harm, whether actual or potential, caused by the contravention, including any increased cost incurred by consumers or other market participants

103. As noted at paragraphs 27 to 49 where we have summarised the Breach Decision, Ofcom took into account the Programme included serious health claims which were unchallenged and were not appropriately contextualised. We were concerned that these potentially harmful claims about two serious medical conditions, polio and cervical cancer (the latter of which can be caused by the HPV virus) were made without adequate protection for the audience. Ofcom considered the breach of Rule 2.1 to be particularly significant as the Programme contained direct calls viewers to act on the information given which could impact viewers' decisions about

²⁷ See footnote 5.

their own health or the health of their families. We took into account that there was no contextual information included in the Programme that might protect viewers, such as alternative views and some of the claims were endorsed by Pastor Chris who we considered to be a voice of authority for viewers of Loveworld.

104. Ofcom took into account the nature of the channel and the likely expectations of viewers. Ofcom recognised that Loveworld is a channel which aims to “provide educational and spiritually enriching content rooted in Christian teachings” and that it strives to “offer multiple viewpoints in our religious programming, promoting respectful and thoughtful exploration of religious subjects”. Therefore, Ofcom considered it is likely that these statements would have a particular weight and authority with viewers.

105. We also took account that viewers were likely to place a great deal of trust in the presenters and pastors who appeared in programmes on Loveworld – including those who appeared on *Echoes of Truth* - and were likely to regard them as authoritative figures. Ofcom considered the status held by the presenters was likely to be a significant factor in how viewers might interpret statements made about vaccinations and could make them more vulnerable to potentially harmful claims.

Any gain (financial or otherwise) made by the regulated body in breach (or any connected body) as a result of the contravention

106. We have no evidence to suggest that the Licensee made any financial or other gain from this breach of the Code.

Whether in all the circumstances appropriate steps had been taken by the Licensee to prevent the contraventions

107. As set out above, we consider this amounted to a serious and repeated failure in compliance. In our view, the Licensee’s compliance procedures were evidently inadequate to prevent the breach of the harm requirement under Rule 2.1 of the Code. We were particularly concerned that previous breaches of this rule had already highlighted the inadequacies of compliance measures and the need for steps to improve them.

108. During the previous sanction proceedings, the Licensee provided Ofcom with information about measures it said it would implement to ensure its ongoing compliance with the Code. Ofcom also noted that there was a compliance meeting with the Licensee, outside of the previous sanction proceedings in August 2020, where similar assurances were made. Details of these previous assurances made to Ofcom are outlined in paragraphs 118 and 127. Taking this background into account, we consider that the Licensee would have been familiar with its obligation under the Code to ensure it provides adequate protection to audiences from harm. In our view, LL ought to have been equipped to ensure it carried out appropriate steps to better prevent further breaches in relation to potentially harmful material.

109. Ofcom also took into account LL’s representations, that it maintained “rigorous editorial standards to ensure our religious programming respects and does not exploit audience susceptibilities” and that it strived to offer “multiple viewpoints in our religious programming, promoting respectful and thoughtful exploration of religious subjects”. Ofcom took account of the representations from the Licensee that it aims to provide educational and spiritually enriching content rooted in Christian teachings and is “deeply committed to presenting Christian teachings and values through a lens that emphasises historical and cultural education”. We also noted it said that its broadcasting of religious content directly manifests its rights under Article 9 of the ECHR, “enabling the expression of religious views and the facilitation of public discourse on faith”. Ofcom emphasises that the Code does not restrict programming which reflects the values and teachings of a particular religious community. However, such content must still

comply with the Code, and the broadcaster must ensure that audiences are appropriately protected from potentially harmful material.

110. Ofcom remained concerned about the Licensee's ongoing commitment and ability to ensure it complies with the Code. In particular, we noted that although LL acknowledged the seriousness of the breach, it said that "several steps have been taken to address these concerns" and maintained that the programme sought to "provide a balanced and informative response to the opposing mainstream narrative". The Licensee also said that its audience are "often encouraged to engage in their own research so they can make informed decisions" and that it had "new findings" to support the statements made in the Programme (see paragraph 55). The Code does not prevent broadcasters from providing viewpoints which may be considered controversial and challenging, including in relation to public health policies, but they must ensure audiences are protected from potential harm, which under Rule 2.1, requires that they employ effective editorial techniques where necessary.
111. Given the factors above, Ofcom is concerned that the circumstances of this case demonstrate that the Licensee has an ineffective approach to compliance with the Code and did not take appropriate steps to prevent the contravention.

The extent to which the contravention occurred deliberately or recklessly, including the extent to which senior management knew, or ought to have known, that a contravention was occurring or would occur

112. Ofcom considered that senior management at Loveworld should have taken into account the previous enforcement action taken by Ofcom related to sanction decisions published in December 2022, October 2021, March 2021 and May 2020 and ought to have given careful consideration about how to comply this broadcast of *Echoes of Truth*. Given these previous breaches of Rule 2.1, we considered senior management should have been aware of the potential compliance risk associated with making serious health claims. In particular, LL should have been aware of the importance of ensuring statements that relate to the most serious medical issues and may cause harm are appropriately contextualised so as to adequately protect the audience.
113. Notwithstanding the fact Ofcom considered senior management should have been aware of the potential issues broadcasting such content raised, for the reasons set out in paragraphs 78 to 81, we have no evidence that the breach occurred deliberately or recklessly or with the knowledge of LL's senior management.

Whether the contravention in question continued, or timely and effective steps were taken to end it, once the regulated body became aware of it

114. During the investigation, Ofcom provided the Licensee with its Breach Preliminary View that the content had breached the Code. In its response the Licensee said it "acknowledged Ofcom's concerns regarding the programme, particularly in relation to Rule 2.1" and said it "understands the need to protect audiences from potentially harmful material and to ensure claims presented in programmes are substantiated, balanced, and contextualised".
115. LL also said that a "formal apology aired on 13 December 2024 at 11:00 and 22:30, the same time the episode of *Echoes of Truth* aired, which reflects our commitment to acknowledging these concerns publicly and demonstrating our accountability to viewers and regulatory authorities". While Ofcom welcomed this, we did not think it provided adequate protection to viewers from the harm of the original Programme, as it was broadcast almost seven months later and did not address the potential harm or provide challenge to the statements made in the original broadcast. The transcript of the broadcast was as follows:

“The program titled Echoes of Truth, which aired on 31st May 2024 on Loveworld UK, was produced by the Global Youth Television Forum (“GYTF”). Please note that the discussions and views expressed during this program are solely those of the participants and do not reflect the opinions, beliefs, or stance of Loveworld UK as a station, particularly regarding matters such as vaccines or related health topics. Loveworld UK remains neutral and does not endorse or oppose any specific views shared by independent program producers and does not in any way suggest to the public the conventional medical treatment is ineffective”.

116. In its representations, LL said it “sincerely apologise[d] for any distress or confusion caused by the content of this broadcast” and outlined a number of remedial steps it intended to take, detailed in paragraph 59, which it had failed to implement in its broadcast of *Echoes of Truth*.

Any steps taken for remedying the consequences of the contravention

117. As set out in the Breach Decision, to remedy the consequences of the broadcast, we acknowledged LL had broadcast a formal apology on 13 December 2024 at 11:00 and 22:30, the same time the Programme had been broadcast. For the reasons set out above, we did not consider this adequately protected audiences from the potential harm caused by the original broadcast.

Whether the regulated body in breach has a history of contraventions (repeated contraventions may lead to significantly increased penalties)

118. We have set out below the findings previously made by Ofcom in relation to Loveworld and published in our Broadcast and On Demand bulletin.

Your Loveworld (broadcast on 4 September 2021)

119. In our breach decision regarding the broadcast of *Your Loveworld* on 4 September 2021, Ofcom found LL in breach of Rules 2.1 and 4.6 of the Code. Ofcom found that the programme contained potentially harmful statements that solicited donations on the basis of religious faith with claims they would improve the donor’s health, wealth and success without providing adequate protection to viewers. The programme was presented by two pastors and included several appeals to the audience to donate money by dialling a number or entering a code into an app, suggesting amounts ranging from \$1,000 to \$1 million on the basis of religious faith. The calls to make donations were broadcast alongside testimonies from viewers who claimed that they had received financial or health improvements as a result of making a donation or calling the number displayed on-screen. This included an individual who “sowed a \$100 seed believing for a dream home and now I have it”. Ofcom noted that both the pastors repeated and/or clarified the claims made by viewers (e.g. “If God could do it for Cheryl in Pennsylvania, God can do it for you. Call right now. Don’t delay this”). Ofcom concluded that viewers would have been led to believe that the act of donating would be a solution to serious financial or health difficulties. Ofcom considered that this message was potentially harmful and may have resulted in viewers donating more than they could reasonably afford in the hope of being rewarded. Ofcom concluded that there was a material risk that susceptible members of the audience may have been improperly exploited by the programme.

120. On 5 December 2022, Ofcom published a sanction decision²⁸ imposing a financial penalty of £15,000 in relation to the *Your Loveworld* breaches. Ofcom took into account LL had recorded no further breaches related to its coverage of public health crises or the Coronavirus pandemic and therefore considered that aspects of the assurances made by the Licensee in previous engagement had been met and that the previous financial penalties had, to an extent, acted as a deterrent and encouraged the Licensee to take steps to improve its compliance. Ofcom took into account that in its representations on the sanction preliminary view, LL acknowledged that in

²⁸ See footnote 23.

retrospect, aspects of the programme could be seen to exceed typical programming of this nature. Ofcom acknowledged the steps the Licensee had taken to prevent a recurrence of these breaches. LL said it had discussed alternative wording that could be used in future broadcasts. Furthermore, it said that it had created an “internal document”, with learnings from the breach decision to prevent a recurrence and to provide guidance to pastors featured on the channel. It also said that the document included considerations of “aspects that we need to adjust when taking programmes from different providers”.

Full Disclosure (broadcast on 11 and 12 February 2021)

121. In our breach decision regarding the separate broadcasts of *Full Disclosure* on 11 February 2021 at 17:00 and 12 February 2021 at 11:00, Ofcom found LL in breach of Rules 2.1 and 2.2 of the Code. In particular, Ofcom found that the programmes contained harmful and materially misleading statements about the Coronavirus pandemic and vaccine rollout and had the potential to cause significant harm without providing adequate protection to viewers. This included, but was not limited to, claims that the Coronavirus vaccine “is just like getting Covid-19, Sars-Covid-2 virus”; that there had been a number of serious side effects or medical complications from taking a Coronavirus vaccine, including “How many people have you heard about who are 80, of taking the vaccine and died as a result?”, “We’ve seen people dying. We’ve seen people with adverse reactions. We’ve seen people who no longer can walk”; and that a pregnant woman had a miscarriage “within hours or within days” of taking a vaccine. The programme also contained claims that alternative treatments for the Coronavirus were available but were being deliberately withheld from UK patients for financial reasons, and that in Wales, Coronavirus “was not even in the top ten biggest killers in the country”, when it had been the leading cause of death at the time for the second consecutive month. In its representations, LL said that it had “elaborated on the new compliance processes” but did not provide details as to how its compliance procedures had been elaborated upon.

122. A sanction decision²⁹ to direct the Licensee to broadcast statements of Ofcom’s findings was issued alongside the publication of the breach decision given the serious nature of the breaches in this case, and in order to remedy the potential harm caused as quickly as possible in the context of the ongoing Coronavirus pandemic. Ofcom then considered whether it was appropriate to impose a further sanction. On 5 October 2021, Ofcom imposed a financial penalty of £25,000 for breaches of Rules 2.1 and 2.2 of the Code. Ofcom outlined in its sanction decision that this was not an indicator that the breach was of a lesser degree of seriousness than that for which a substantially higher penalty was imposed in *Global Day of Prayer* (outlined below). Importantly, the assurances made during the sanction procedure for LL’s broadcast of *Global Day of Prayer* had not concluded at the time of the two *Full Disclosure* broadcasts. However, the penalty recognised that the evidence we had at the time indicated that the previous penalty had a deterrent effect and had led to significant changes in the Licensee’s approach to compliance.

Global Day of Prayer, (broadcast on 1 December 2020)

123. In our breach decision regarding the *Global Day of Prayer* broadcast on 1 December 2020 for 29 hours and 15 minutes, Ofcom found LL in breach of Rules 2.1 and 5.1 of the Code. In particular, Ofcom found that the programme featured potentially harmful, highly contentious and unevicenced conspiracy theories about the Coronavirus, without sufficient challenge or context. The programme included claims that the pandemic was “planned” and linked to 5G technology; that face masks were “evil” and harmed health; that Coronavirus testing was fraudulent and a way to deceive the public and that the vaccines contained nanochips and were part of a “New World Order”. The programme also contained news reports that broadcast statements that were not duly accurate about the Coronavirus, without sufficient challenge or context. This included

²⁹ See footnote 24.

theories that: the Coronavirus pandemic was part of a “*deep state*” conspiracy; lockdown measures in response to the Coronavirus pandemic were fraudulent; testing for the Coronavirus was fraudulent; and the scale of the pandemic had been exaggerated. In its representations, LL gave a list of remedial steps it intended to take, including that it would:

- review its broadcasts in future “to omit any potentially harmful claims in relation to Covid”;
- monitor live programmes, including Pastor Chris’ sermons, and make use of a broadcast delay mechanism to omit potentially harmful claims about the Coronavirus;
- not broadcast the *Global Day of Prayer* again, or feature it on its website;
- brief its presenters on compliance with the Code, Ofcom’s Guidance and Ofcom’s recent decisions about content relating to Coronavirus;
- make use of on-screen disclaimers in future advising viewers to “consult qualified medical practitioners and/or official Government advice, before making any decisions based on any broadcasts relating to Covid”;
- tell its presenters to provide appropriate challenge to “to guests making unproven claims, and/or expressing views contrary to official government advice and/or mainstream science”; and
- brief its presenters in the need for them to “take particular care and act responsibly” and to “give due weight to official Government advice and/or mainstream science”.

124. A sanction decision³⁰ was issued alongside the breach decision, directing the broadcast of statements of Ofcom’s findings, in order to remedy the potential harm caused as quickly as possible given the serious breaches in this case and in the context of the Coronavirus pandemic. Ofcom then considered whether to impose a further sanction in addition to the direction in this case. On 30 March 2021, Ofcom published a sanction decision imposing a financial penalty of £125,000 against LL. In its representations on Ofcom’s sanction preliminary view during the sanction procedure, LL said that following these breaches it recognised “where the weakness may be and that needs to be strengthened and strengthened quickly”. It also accepted its compliance “regime was not as rigorous as it should have been” and added it was “anxious to remedy any issues”. LL also outlined steps it intended to take in order to improve its compliance, including that:

- it had installed a new system which enabled a 20 second delay to live feeds;
- it had arranged sessions with an experienced TV and radio compliance consultant who would be able to produce a report outlining the compliance measures that had been put in place following the sessions; and,
- it had recently employed a new Head of News based in its London studio to exercise editorial oversight of its news and current affairs content.

125. Ofcom outlined in this sanction decision that it would follow up on the assurances given by LL and would require confirmation that it had carried out the changes it said it would undertake. Ofcom also said it would take the assurances given in this case into account in considering any future breaches committed by this Licensee.

Loveworld News and Your Loveworld (broadcast on 7 April 2020)

³⁰ See footnote 25.

126. In our breach decision regarding *Loveworld News* and *Your Loveworld* broadcast on 7 April 2020, Ofcom found LL in breach of Rule 2.1 in both programmes and Rule 5.1 in the case of *Loveworld News*. In particular, Ofcom found that both broadcasts featured potentially harmful statements about the Coronavirus pandemic and adequate protection was not provided to viewers and, in the case of *Loveworld News*, statements on a news programme were not presented with due accuracy. Ofcom found that a report on *Loveworld News* included unsubstantiated claims that 5G was the cause of the pandemic, and that this was the subject of a “global cover-up”. Another report during the programme presented the anti-malarial medication hydroxychloroquine as a “cure” for Covid-19, without acknowledging that its efficacy and safety as a treatment was clinically unproven. A sermon broadcast on *Your Loveworld* also included unsubstantiated claims linking the pandemic to 5G technology, as well as claims which cast serious doubt on the need for lockdown measures and the motives behind official health advice on Covid-19, including in relation to vaccination. The material included in the programmes was presented as facts without evidence or challenge.

127. In its representations on the preliminary view in relation to the breaches, LL gave a list of remedial steps it said it intended to take, which included:

- to review all of its broadcasts carefully in future to omit any potentially harmful claims in relation to COVID-19 and 5G, unless there was, at the same time, adequate protection for the public;
- to monitor ‘live’ parts of *Loveworld News* and “all other such programmes”, and broadcast with a sufficient delay mechanism to allow time for any potentially harmful claims in relation to COVID-19 and 5G to be omitted (or adequate protection included);
- not to repeat identified or similar statements to those giving rise to the breach; and
- briefing presenters on Ofcom’s guidance to broadcasters in relation to COVID-19; recent published decisions covering programmes featuring COVID-19 discussions; the use of appropriate disclaimers and advice; making appropriate challenges in response to guests making unproven claims, or expressing views contrary to official government advice or mainstream science; and taking account of the impact of their role on viewers and relevance of giving due weight to official government advice and mainstream science.

128. A sanction decision was published alongside the breach decisions in order to remedy the potential harm caused as quickly as possible in the context of the pandemic at that time. This directed the Licensee to broadcast two separate statements of Ofcom’s findings in relation to the breaches. Ofcom then went on to consider whether to impose a further sanction in addition to the directions in this case. On 22 June 2020, Ofcom published a sanction decision³¹ that concluded that, due to a range of factors, including the particular context in this case and the remedial steps proposed by the broadcaster, the direction to broadcast statements of findings was sufficient at that stage, and no further sanction was imposed. LL also attended a compliance meeting following these proceedings in August 2020 in which its representations during the investigation, its compliance procedures and its planned compliance improvements were discussed.

The Healing School, 10 November 2017

129. In our breach decision regarding *The Healing School* broadcast 10 November 2017 at 06:30 and 10:00³², Ofcom found LL in breach of Rule 2.1 of the Code. Our investigation found that two

³¹ See footnote 26.

³² See *The Healing School In Breach Decision* published on July 2018 in the [Ofcom Broadcast and On Demand Bulletin Issue 358](#).

programmes about a place called The Healing School, described on its website at the time as “a healing ministry of Rev. Chris Oyakhilome (Ph.D.) which takes divine healing to the nation”³³, included accounts of people that had been healed of illnesses through attending The Healing School. Ofcom found that viewers of the programme may have been led to believe that conventional medicine was unlikely to be able to cure or treat their illnesses effectively, but that The Healing School was able to remedy those ailments completely. Ofcom found that, although the programme contained no direct instruction to reject conventional medicine, there was the potential that viewers may have either failed to seek conventional medical advice or stopped following a course of recommended medical treatment as a result of what they had seen in the programmes. Ofcom considered that the Licensee had not taken steps to provide viewers with adequate protection from the claims made in the programme. For instance, no warning about seeking advice from a GP or additional information regarding the continuation of conventional medical treatments were included in the programmes.

130. Unrelated to the broadcasting standards breaches, Ofcom found LL in breach of its TLCS Licence Conditions on one occasion in February 2019 which related to late payment of licence fees³⁴.

131. In summary, Ofcom has now recorded six breaches of broadcasting standards rules which includes the broadcast of *Echoes of Truth* in this case, since its licence started in August 2004. Each of these breaches involved Rule 2.1 and five of them have occurred since 2020. These breaches have led to four sanctions being imposed on the licensee – three being financial penalties alongside a direction to broadcast a statement of findings and one being a direction to broadcast a statement of findings.

The extent to which the regulated body in breach has cooperated with our investigation.

132. The Licensee has cooperated with our investigation to the extent it has provided representations in response to Ofcom’s formal requests for information relating to the material broadcast and information requested about its financial situation.

Precedents (relating to other Licensees)

133. In accordance with the Penalty Guidelines, in coming to this Decision, Ofcom has had regard to the precedents set by previous cases of relevance which included sanction(s) for breach(es) of Rule 2.1 of the Code. Details of these cases are set out below:

134. **9 December 2025, The Word Network Operating Company**³⁵ Having previously found breaches of Rules 2.1, 4.6 and 9.4 of the Code, Ofcom imposed a financial penalty of £150,000. The four episodes of the *Peter Popoff Ministries* invited viewers to order the “Miracle Spring Water”. Peter Popoff made several claims about its efficacy. These were broadcast alongside testimonies from Mr Popoff’s congregation and viewers who said they had made contact with Peter Popoff either by direct correspondence or by ordering the “Miracle Spring Water”. The testimonials included direct or strongly implied claims that direct contact with Peter Popoff or using the “Miracle Spring Water” had resulted in a financial windfall or cured congregation members’ and viewers’ loved ones of serious illnesses, including cancer. Ofcom found that the programme contained potentially harmful claims that by contacting the presenter’s ministry, or by ordering its “Miracle Spring Water”, viewers could improve serious health conditions or financial difficulties. Ofcom was particularly concerned that the programmes included repeated statements and testimonials about the efficacy of the water, claiming or strongly implying the water cured serious illnesses, including cancer. We considered the claims were effective ways to improve serious medical illnesses or financial difficulties, improperly exploited the

³³ Link quoted in Standards Decision, see <http://www.enterthehealingschool.org/about-us.html>.

³⁴ See page 104 on [Ofcom Broadcast and On Demand Bulletin 373](#) for a full list of late and non-payment of licence fees.

³⁵ [Sanction Decision - The Word Network \(Peter Popoff December 2023\)](#).

susceptibilities of viewers and had the potential to cause harm without the Licensee providing adequate protection. Further, we considered the likelihood of harm to viewers was increased significantly by the frequency at which the “Miracle Spring Water” was promoted during the programme. Given the previous sanctions of the Code for the same programme (paragraph 135) Ofcom considered the breaches in the programmes broadcast between 6 and 12 December 2023 to be serious, repeated and reckless.

135. 9 December 2025, The Word Network Operating Company³⁶ Following a finding that the licensee had breached Rules 2.1, 4.6 and 9.4 of the Code, Ofcom imposed a financial penalty of £175,000. Ofcom found that the programme, *Peter Popoff Ministries*, contained potentially harmful claims that by contacting the presenter’s ministry, or by ordering its “Miracle Spring Water”, viewers could improve serious health conditions or financial difficulties. The testimonies included an account of how this brought about: significant improvements to their financial situation; their or their loved ones’ full recovery from serious illnesses; or their complete recovery from an addiction to alcohol and/or drugs. Ofcom was particularly concerned that the programmes included repeated statements and testimonials about the efficacy of the water, claiming or strongly implying the water cured serious illnesses. We considered the claims that contacting the ministry, or using its “Miracle Spring Water” were effective ways to improve serious medical illnesses or financial difficulties improperly exploited the susceptibilities of viewers and had the potential to cause harm without the licensee providing adequate protection. Further, we considered the likelihood of harm to viewers was increased significantly by the frequency at which the “Miracle Spring Water” was promoted during the programme. Ofcom therefore considered the breaches in the programme broadcast in May 2024 to be serious, repeated and reckless.

136. 9 December 2025, The Word Network Operating Company³⁷ Following a finding that the licensee had breached Rules 2.1, 9.1, 9.2 and 9.13(g) of the Code, Ofcom imposed a financial penalty of £50,000. The relevant programme, *Stem Cell Activators*, referred to, and promoted, products for the treatment of medical conditions. The presenters and on-screen graphics (present throughout the programme) invited viewers to purchase the products. The programme focussed on the benefits of one product, “CNT Stem Cell Activator”. It included testimonies in which people explained how purchasing and using the “CNT Stem Cell Activator” had brought about their recovery from problems related to ligaments, joints and tendons. The programme contained visual references to other “Stem Cell Activators” along with claims that they could assist in treating a range of medical issues, many of which are considered to be serious conditions. Ofcom found that the claims made about the products’ effectiveness in treating medical conditions, including serious illnesses, were potentially harmful to vulnerable viewers. Ofcom also considered the repeated promotion of the products meant that the programme was not sufficiently distinct from advertising. Ofcom therefore found that The Word Network Operating Company had failed to adequately protect viewers from potentially harmful material in the programme.

137. 11 March 2025, The Word Network Operating Company³⁸. Having previously found breaches of Rules 2.1, 4.6 and 9.4 of the Code, Ofcom imposed a financial penalty of £150,000, directed the licensee not to repeat the programme and directed the licensee to broadcast a statement of Ofcom’s findings on its service, The Word Network. The relevant programme, *Peter Popoff Ministries*, included a series of invitations to viewers to order the ministry’s “FREE MIRACLE SPRING WATER”. These were broadcast alongside testimonies from attendees of Mr Popoff’s services about the effect of the water. The attendees claimed, or strongly implied, that the

³⁶ See [Sanction Decision - The Word Network \(Peter Popoff Ministries 2024\)](#).

³⁷ See [Sanction Decision - The Word Network \(Stem Cell Activators\)](#).

³⁸ See [Sanction Decision - The Word Network \(Peter Popoff Ministries Dec 2023\)](#).

water had cured them of serious illnesses, such as cancer and kidney failure. Ofcom found that the claims had the potential to cause harm because members of the audience may have been led to believe that the “miracle spring water” alone was sufficient to cure their health conditions and that it was unnecessary to rely on, or continue receiving, conventional medical treatment. We considered this could have a damaging effect on vulnerable viewers targeted by the presenter’s offer of the “miracle spring water”. The programme contained no information to alert viewers to the importance of seeking conventional medical advice from qualified doctors about the health conditions mentioned in the programme, nor was any challenge provided. Ofcom considered that given the religious nature of the programme, there was an increased risk that viewers would be susceptible to claims about the water’s effectiveness. Ofcom therefore found that The Word Network Operating Company had failed to adequately protect viewers from potentially harmful material in the programme.

138. **3 December 2018, Greener Technology Ltd (Ben TV)**³⁹. Following a finding that the licensee had breached Rule 2.1 of the Code, Ofcom imposed a financial penalty of £25,000, directed the licensee not to repeat the programme and directed the licensee to broadcast a statement of Ofcom’s findings on its service, Ben TV. The relevant programme, *Peter Popoff Ministries*, included a series of invitations to viewers to order the ministry’s “FREE MIRACLE SPRING WATER”. These were broadcast alongside testimonies from attendees of Mr Popoff’s services about the effect of the water. The attendees claimed, or strongly implied, that the water had cured them of serious illnesses, such as cancer and kidney failure. Ofcom found that the claims had the potential to cause harm because members of the audience may have been led to believe that the “miracle spring water” alone was sufficient to cure their health conditions and that it was unnecessary to rely on, or continue receiving, conventional medical treatment. We considered this could have a damaging effect on vulnerable viewers targeted by the presenter’s offer of the “miracle spring water”. The programme contained no information to alert viewers to the importance of seeking conventional medical advice from qualified doctors about the health conditions mentioned in the programme, nor was any challenge provided. Ofcom considered that given the religious nature of the programme, there was an increased risk that viewers would be susceptible to claims about the water’s effectiveness. Ofcom therefore found that Greener Technology Ltd had failed to adequately protect viewers from potentially harmful material in the programme.

Summary of sanctions precedents

139. Ofcom considered the nature and the content in the cases listed above in paragraphs 134 to 138 to be of particular relevance to the current case. However, we note that under the Penalty Guidelines⁴⁰ Ofcom may depart from precedents set by previous relevant cases, depending on the facts and context of each case.

140. Ofcom has also taken into account the precedent cases involving LL, listed in paragraphs 119 to 131, and that this contravention was not the Licensee’s first serious breach involving potential harm. Ofcom considered these cases to be most relevant to the breach relating to *Echoes of Truth* as they involved the broadcast of potentially harmful content which included claims or advice about matters related to health without adequate protection to audiences. We noted that this broadcast of *Echoes of Truth* represents the fifth breach of Rule 2.1 of the Code from a programme broadcast by the Licensee since 2020, and that despite repeated assurances made by the Licensee in its representations on the previous breaches and sanctions recorded, further breaches have occurred.

The size and turnover of the regulated body when considering the deterrent effect of any penalty

³⁹ See [Greener Technology Sanction Decision](#) published in December 2018.

⁴⁰ See footnote 5.

141. As set out in our Penalty Guidelines⁴¹, the central objective of imposing a penalty is deterrence. The amount of any penalty must be sufficient to ensure that it will act as an effective incentive to ensure compliance, having regard to the seriousness of the infringement. Any proposed penalty must be proportionate taking into account the size and turnover of the licensee, its rights under Article 10 of the Convention and the fact that deterrence is the central objective of imposing a penalty.
142. In reaching its Decision on the imposition and level of a sanction, Ofcom has taken account of the information submitted by the Licensee for its qualifying revenue in order to determine the statutory maximum for the penalty that can be imposed. The Licensee's response to Ofcom's request for qualifying revenue for the calendar year 2023 informed Ofcom that the Licensee's qualifying revenue was [~~S~~CONFIDENTIAL].
143. Since 2020, Ofcom has imposed a combined financial penalty of £165,000 on the Licensee. As set out in paragraphs 119 to 120, most recently in December 2022, we imposed a financial penalty of £15,000 for the broadcast of *Your Loveworld*. This was after having imposed a financial penalty of £25,000 in October 2021 for the breaches arising from the broadcasts of *Full Disclosure* and £125,000 in March 2021 for the breaches arising from the broadcast of *Global Day of Prayer*⁴². However, despite the previous assurances made to Ofcom by LL during these previous sanction procedures regarding its improved compliance procedures, this case represents another serious breach of Rule 2.1.
144. Ofcom noted that in LL's representations it said that it "cannot afford further statutory sanctions". However, based on the qualifying revenue it supplied to Ofcom we did not consider that LL would be unable to pay a financial penalty in this case. In addition, LL has not provided further financial information to Ofcom to evidence that it is unable to pay another financial penalty.
145. For all the reasons set out above, Ofcom considers it is proportionate to impose a financial penalty on the Licensee of £200,000.

Decision

146. To achieve Ofcom's central objective of deterrence, we have carefully considered the nature and level of statutory sanction that should be imposed. In doing so, we have taken account of the particular serious and repeated nature of the breach, the Licensee's representations, the Licensee's size and financial position, and relevant precedent cases. We have also had regard to our legal duties, as set out in the Breach Decision, including the need to ensure that any sanction we impose is proportionate, consistent and targeted only at cases where action is needed.
147. We are very concerned about the potentially harmful nature of some of the content that has been broadcast on Loveworld, and the Licensee's pattern of non-compliance. Consequently, as set out in detail above, Ofcom gave serious consideration as to whether revocation of the Licensee's licence would be a proportionate sanction in this case. Revocation is the ultimate enforcement action available to Ofcom and therefore there is a high threshold for revoking a licence. We have given careful consideration to the impact on the broadcaster's and audience's rights under Articles 9 and 10 of the Convention. We have decided, on balance, that it would not be appropriate on this occasion to revoke the licence.
148. **Ofcom is clear that the Licensee's rights under Articles 9 and 10 are qualified rights and we have an ongoing regulatory duty to protect audiences from potential harm. Therefore, Ofcom underlines to Loveworld the importance of future compliance with Rule 2.1 and that any further failure to comply, could result in Ofcom giving serious consideration as to whether a**

⁴¹ See footnote 5.

⁴² See footnote 15.

contravention, if not appropriately remedied, would justify revocation of its licence. Given Ofcom's concerns, we will be carrying out monitoring of Loveworld's programming to ensure ongoing compliance with the Code.

149. Having regard to all the factors set out above, Ofcom's Decision is that it is appropriate to impose a statutory sanction for the Code breach. This sanction would be to impose a financial penalty of £200,000 (payable to HM Paymaster General) alongside the broadcast of a statement of findings.

Ofcom
22 June 2026