

Sanction: Decision by Ofcom

Sanction: to be imposed on Word Network Operating Company Inc.

For the following material broadcast on The Word Network:

Peter Popoff Ministries, 6 December 2023 (repeated on 8 December 2023)

Peter Popoff Ministries, 7 December 2023

Peter Popoff Ministries, 11 December 2023

Peter Popoff Ministries, 12 December 2023

Ofcom's Decision of Sanction against:

Word Network Operating Company Inc ("The Word Network" or the "Licensee") in respect of its service **The Word Network** (TLCS104161BA).

For:

Breaches of the Ofcom Broadcasting Code ("the Code")¹ in respect of:

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 and/or offensive material";

Rule 4.6: "Religious programmes must not improperly exploit the susceptibilities of the audience"; and

Rule 9.4: "Products, services and trade marks must not be promoted in programming".

Ofcom's Decision:

To impose a financial penalty (payable to HM Paymaster General) of **£150,000**.

¹Available at: <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-standards/broadcast-code>

Executive Summary

1. The Word Network is a religious channel aimed at the Christian community. The Ofcom licence for this service is held by Word Network Operating Company Inc. The Licensee does not currently hold any other broadcasting licence.
2. Condition 6 of the Licence requires the Licensee to ensure compliance with Ofcom's Broadcasting Code.
3. Peter Popoff is a televangelist who presents the *Peter Popoff Ministries* series of programmes with his wife Elizabeth Popoff. These programmes include footage from Mr Popoff's religious ministry services, held at various locations in the United States, and occasions when Peter Popoff and his wife address viewers directly from a studio.
4. During monitoring, Ofcom identified four episodes of *Peter Popoff Ministries* broadcast on 6, 7, 11 and 12 December 2023 ("the Programmes") that contained frequent oral and visual invitations to order the ministry's "Miracle Spring Water". This could be done by calling a US or UK telephone number or scanning a QR code. The numbers and QR Code were displayed on screen for the majority of the Programmes, alongside the text "CALL OR TEXT FOR YOUR FREE MIRACLE SPRING WATER". Details of Peter Popoff's website and Facebook page were also shown. Towards the end of each episode the ministry's US postal address also appeared on screen alongside this information. The episode broadcast on 6 December 2023 was repeated on 8 December 2023.
5. When inviting 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 about the effect of the 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.

The Breach Decision

6. Ofcom's Breach Decision was published on 7 May 2024 in issue 497² of the Broadcast and On Demand Bulletin. Ofcom found that the material in the Programmes breached Rules 2.1, 4.6 and 9.4 of the Code.
7. The Breach Decision set out the reasoning as to why the material had breached each rule.
8. The Breach Decision also set out Ofcom's concerns that the breaches occurred within days of the Licensee being found in breach of the Code for the broadcast of very similar material³ and that the content appeared to represent serious and repeated Code breaches. Ofcom therefore put the Licensee on notice that it was minded to consider the breaches for the imposition of a statutory sanction.

The Sanction Decision

9. In accordance with Ofcom's procedures for the consideration of statutory sanctions in breaches of broadcast licences ("the Sanctions Procedures"),⁴ Ofcom has considered

² Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/about-ofcom/bulletins/broadcast-bulletins/2024/issue-497/peter-popoff-ministries-the-word-network-6-12-december-2023---decision.pdf?v=319045>

³ Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/about-ofcom/bulletins/broadcast-bulletins/2023/issue-487/peter-popoff-the-word-network-9-and-10-may?v=330513>

⁴ Available at: https://www.ofcom.org.uk/data/assets/pdf_file/0030/71967/Procedures_for_consideration.pdf

whether the Code breaches were serious, deliberate, repeated and/or reckless so as to warrant the imposition of a sanction on the Licensee in this case.

10. 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 4 August 2025 and gave it the opportunity to provide both written and oral representations. The Licensee provided written representations on 3 September 2025 which are summarised in paragraphs 45 to 53.
11. Having considered these representations, Ofcom has reached the decision that a sanction is merited in this case since the breaches were serious and repeated, for the reasons set out in paragraphs 58 to 65 below.
12. This document sets out Ofcom's Sanction Decision, taking into account all the relevant material in this case and Ofcom's Penalty Guidelines ("the Penalty Guidelines").⁵

Legal Framework

Communications Act 2003

13. 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. In carrying out its functions, Ofcom is required to secure a number of other matters. These 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 offensive and harmful material in such services (section 3(2)(e)).
14. 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 appear to it best calculated to secure the standards objectives set out in section 319(2).
15. Section 319(2)(e) requires that the proper degree of responsibility is exercised with respect to the content of programmes which are religious programmes. This requirement is reflected in Section Four of the Code. 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 Sections Two and Nine of the Code.
16. 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

17. Under section 6 of the Human Rights Act 1998, Ofcom (as a public authority) 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 related rights under Article 9 and Article 10 of the Convention.

⁵ Available at: https://www.ofcom.org.uk/_data/assets/pdf_file/0022/106267/Penalty-Guidelines-September-2017.pdf

18. 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 beliefs 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)).
19. 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)). The exercise of these freedoms may be subject only to conditions and restrictions which are "prescribed by law and are necessary in a democratic society for, among other things, the protection of health or morals or the protection of the reputation or rights of others" (Article 10(2)).
20. Ofcom must exercise its duties in light of these 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 lawful and necessary in a democratic society to achieve a legitimate aim.

Equality Act 2010

21. 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.

Ofcom Broadcasting Code

22. Standards set by Ofcom in accordance with section 319 of the Act are set out in the Code.⁶
23. Accompanying Guidance Notes⁷ 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.
24. The relevant Code rules in this case are set out in full at the beginning of this Sanction Decision.

Remedial action and penalties

25. 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 (TLCS104161BA).
26. 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 insofar as relevant to the case.
27. 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.

⁶ Available at: https://www.ofcom.org.uk/data/assets/pdf_file/0005/100103/broadcast-code-april-2017.pdf

⁷ Available at: <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-standards/programme-guidance>

28. 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 5 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.
29. Section 238 of the Act provides Ofcom with the power to revoke a TLCS licence where a licensee is in contravention of a condition of a TLCS licence or direction thereunder, and Ofcom is satisfied that it is necessary in the public interest to revoke the licence.

Background – The Breach Decision

30. In the Breach Decision, Ofcom found that the Programmes breached Rules 2.1, 4.6 and 9.4 of the Code. The Breach Decision set out the full reasons for each of these breach findings, which are summarised below.
31. The Breach Decision related to a total of four episodes of *Peter Popoff Ministries* broadcast between 6 and 12 December 2023, which were identified through monitoring. The Programmes contained frequent oral and visual invitations to order the ministry's "Miracle Spring Water" alongside contact details of how to do so.
32. The Breach Decision noted that the Programmes included testimonies which comprised people explaining how, through contact with Peter Popoff Ministries or using the "Miracle Spring Water", they brought about:
- their/their loved ones' recovery from illnesses (including cancer);
 - improvement to their financial situation; or
 - their recovery from an addiction to drugs.
33. The Breach Decision included the following testimonies:
- A member of Peter Popoff's congregation explained that she had been diagnosed with breast cancer and told she wasn't going to live. She said *"I wrote to you [Peter Popoff] and you gave me a prayer cloth. And then I put it over me and when I went back in March, they couldn't find anything"*.
 - A second woman said that she had been diagnosed with colon cancer and that she *"used your spring water and it healed"*.
 - A third woman explained that she had an addiction to crack cocaine for six years. She continued: *"I was in hospital and I happened to see your show on TV and so I ordered the spring water. Three years I've been clean"*.
 - A fourth woman said that she had ordered the "Miracle Spring Water" and then *"received a \$35,000 debt cancellation"*.
 - Elizabeth Popoff read out a message from a viewer who said that they were told that *"God was going to direct my steps into financial success"* when being sent the "Miracle Spring Water". The message continued: *"I followed the instructions and placed my money in my wallet...God has blessed me with over \$70,000"*.
34. The Breach Decision noted that Mr Popoff repeated and/or clarified the claims made by these participants (e.g. *"She was diagnosed with colon cancer two years ago, anointed herself with the spring water and she was healed. What did your doctor have to say about that?"*).

35. Ofcom's Guidance Notes⁸ on Section Two of the Code highlight the following as primary factors that would influence the level of harm that could arise from health or wealth claims in programmes: the severity of the situation (e.g. a life-threatening illness), the level of targeted exploitation (e.g. the vulnerability of the audience), and the authority of the speaker. As detailed below, Ofcom considered that all of these factors were relevant in this case.
36. Ofcom assessed the potential for harm. The Programmes included testimonies which included people explaining how, through contact with Peter Popoff Ministries and "Miracle Spring Water", they or their loved ones had been cured of serious illnesses, improved their financial situation and brought about their recovery from an addiction to drugs. Ofcom considered that these claims related to viewers' health and wealth and such claims had the potential to cause harm. In Ofcom's view, viewers were likely to have understood from the testimonies broadcast in the Programmes that serious medical conditions and financial problems could be resolved by direct contact with Peter Popoff's Ministry, including by using the "Miracle Spring Water". Ofcom also took into account that viewers who have a personal experience of serious health or financial issues may have an increased vulnerability to such claims.
37. In the case of health issues, Ofcom considered that the audience might be led to believe that it was unnecessary to rely on, or continue receiving, conventional medical treatment in favour of direct contact with Peter Popoff and by using the "Miracle Spring Water", where this could have a damaging effect on their health.
38. Ofcom considered the testimonies from people who said they had received money may have resonated with a significant number of vulnerable viewers, particularly in light of the rise in the cost of living. In Ofcom's view, the combination of testimonies and Peter Popoff's promise of money as a result of seeking his help and from using the "Miracle Spring Water" may have resulted in financial detriment, as it could have led viewers to believe that their financial difficulties could be resolved by the "Miracle Spring Water" alone, dissuading them from taking other steps to address those difficulties.
39. Ofcom took into account that all primary factors affecting the level of harm listed in its Guidance Notes on Section Two of the Code were present in the Programmes. It considered therefore that the risk of harm to viewers was high.
40. Ofcom therefore examined whether the Licensee had taken steps to provide adequate protection to viewers. The Guidance Notes on Section Two of the Code highlight how the inclusion of an alternative perspective or a warning (e.g. one that advises audience members to consult a qualified doctor before making decisions based on a programme) can be used by broadcasters to protect viewers from potential harm. However, the programmes contained no information that highlighted the importance of seeking professional advice, e.g. health advice from qualified medical professionals, or financial advice from independent financial advisors, nor did they feature any challenge or any other form of context to the claims of efficacy made about the "Miracle Spring Water" in the Programmes. Therefore, Ofcom did not consider the Licensee had provided adequate protection for viewers from the potentially harmful content in the Programmes. It accordingly decided that the material breached Rule 2.1 of the Code.
41. The Programmes contained repeated statements and testimonials that improvements to people's health or wealth had occurred, or would take place, directly as a result of ordering

⁸ Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/broadcast-guidance/programme-guidance/broadcast-code-guidance/section-2-guidance-notes.pdf?v=322622>

and using the “Miracle Spring Water” or contacting Peter Popoff Ministries, without offering any objectively verifiable evidence. Given the religious nature of the Programmes and that viewers were likely to consider Mr Popoff as a religious person with authority, Ofcom considered that vulnerable viewers in particular were less likely to question the content and, as such, were susceptible to the unchallenged claims made in the Programmes. Consequently, Ofcom concluded that the Programmes specifically targeted susceptible viewers and that there was a material risk that these members of the audience had been improperly exploited. Ofcom therefore decided that the material breached Rule 4.6 of the Code.

42. As stated, the Programmes contained frequent on-screen and oral invitations to order “Miracle Spring Water” in the context of promoting Peter Popoff Ministries. Additionally, the featured testimonials and the language used to describe the water’s effectiveness (e.g. *“you’ve read and listened to hundreds of testimonies from people who have been saved, healed, delivered, set free, financially prospered as they used the Miracle Spring Water”*) served to encourage viewers to place an order. Rule 9.4 of the Code prohibits the promotion in programmes of products and services, irrespective of whether they are offered in return for payment or not. On that basis, Ofcom considered that the Programmes promoted a product – the “Miracle Spring Water” – and that therefore Rule 9.4 was breached.

Ofcom’s Sanction Preliminary View

43. 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.
44. In accordance with the Sanctions Procedures, Ofcom provided the Licensee with its Sanction Preliminary View and the opportunity to make representations. The Licensee provided written representations in response, which are summarised below.

Licensee’s representations on the Sanction Preliminary View

45. While the Licensee acknowledged Ofcom’s Sanction Preliminary View, it fully refuted the Breach Decision. It contested the material within the Programmes amounted to a breach of Rules 2.1, 4.6 or 9.4. The Licensee said that it took its regulatory responsibilities seriously and had “undertaken a full internal review of the circumstances surrounding the broadcast”.

Potential for Harm (Rule 2.1)

46. The Word Network said that the testimonies in the Programmes were ‘legitimate first-person accounts’ of individuals’ experiences upon receiving the “Miracle Spring Water”. It explained that the testimonials demonstrated these individuals had experienced a change in their circumstances and that this change coinciding with their receipt/use of the “Miracle Spring Water” was an added dimension. The Licensee added that the “Miracle Spring Water” was not a banned substance, and no actual claim was made with regard to its properties.
47. When reviewing the content of the Programmes, the Licensee considered that, in the context of a programme originating from the United States, the testimonies were protected free speech under the Constitution of the United States of America and, as such, formed part of a legitimate right of expression. It added that its review also took account of audience expectations for the time and channel that would normally encompass “prayers, recitations of articles of faith, religious teachings and cursive [sic] narrative”.
48. The Licensee said that upon receipt of correspondence from Ofcom, it had reviewed its practices.

Potential exploitation of the audience (Rule 4.6)

49. The Word Network said that the Programmes did not seek to exploit its viewers and that it was not aware of any complaint with regards to the content of the Programmes or the featured “Miracle Spring Water”. The Licensee added that the intended audience could “reasonably be expected to interpret the material as religious narrative, expanding on themes of redemptive ‘healing’, or finding solace through their faith”.
50. The Licensee accepted that the material ‘may not have been sufficiently clear in its presentation detail that viewers should also seek professional medical assistance for ailments’. It did, however, point out that at no time did the Programmes discourage audiences from doing so.

Promotion of products and services (Rule 9.4)

51. The Licensee said that there was no requirement to pay for the receipt of the “Miracle Spring Water” and that viewers were simply informed of how to obtain the free item being offered. It also argued that the references to the “Miracle Spring Water” arose organically from the subject matter under discussion in the Programmes.

Mitigating Factors

52. The Word Network referenced the following which it considered relevant:
- the ‘principles of free speech’ applicable to where the Programmes were recorded and originally broadcast;
 - the clarifications and apologies it had broadcast (where appropriate) to address any potential harm;
 - the strengthening of its compliance systems, further editorial checks and staff training;
 - its full cooperation with Ofcom’s investigation and its commitment to transparency;
 - that there was no intention to broadcast material that breached the Code; and
 - that it no longer holds, possesses or utilises an Ofcom licence.⁹
53. The Licensee concluded by stating that, while it recognised Ofcom’s concerns, the alleged breaches should be considered at the lower end of the scale due to the absence of intent and the editorial context and principle of free speech under the US Constitution which guided the original programming decision and the inclusion of the testimonies.

Preliminary View on financial penalty

54. Ofcom’s Sanction Preliminary View was that a financial penalty would be appropriate in this case.

Ofcom’s decision to impose a statutory sanction

55. 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, repeatedly and/or recklessly breached a relevant requirement.
56. Ofcom acknowledged that the Programmes were recorded and originally broadcast in the United States and fully recognised the right to freedom of speech in the first amendment of US Constitution. However, as an Ofcom licensee, The Word Network is required to ensure

⁹ As noted in paragraph 57, while The Word Network ceased broadcasting in the UK on 25 February 2025, the Licensee continues to hold an Ofcom licence.

that content it broadcasts on its UK service complies with the Code, which has been drafted in the light of the Human Rights Act 1998 and Article 10 of the Convention. This applies to all programmes on an Ofcom-licensed service, irrespective of where a programme was produced or originally broadcast.

57. In its representations, the Licensee asserted that it no longer holds, possesses or utilises an Ofcom licence. However, while The Word Network ceased broadcasting in the UK on 25 February 2025, at the time of writing, it continues to hold an Ofcom licence. This factor did not impact upon or change the outcome of this Sanction Decision.

Serious nature of the breaches

58. In reaching a decision that the breaches were serious, Ofcom took into account the Licensee's representations that the channel's content generally comprised "prayers, recitations of articles of faith, religious teachings and cursive [sic] narrative" and that the Programmes would have been in keeping with audience expectations. Ofcom also noted the Licensee's view that no claim was made about the properties of the "Miracle Spring Water" and that the testimonies were presented in such a way that implied each individuals' use of the "Miracle Spring Water" was an "added dimension" to their change in circumstances.
59. While Ofcom acknowledged that the general style and content of the Programmes may have been within the scope of what regular audiences would have expected, it did not agree with the Licensee's view that the use of "Miracle Spring Water" was merely an "added dimension" to the positive change reported in individuals' circumstances. As the examples listed in paragraph 33 demonstrate, the testimonies contained claims from individuals that their circumstances had improved as a direct result of ordering and/or using the "Miracle Spring Water" from the ministry. Further, the fact that these claims were made alongside unambiguous statements made by a figure of religious authority meant that some audience members may have taken the claims made in the Programmes at face value.
60. We considered the breaches were serious because, as set out above, the Programmes featured numerous unambiguous claims that through either contact with Mr Popoff, or by using the ministry's "Miracle Spring Water", serious illnesses could be cured. This may have persuaded vulnerable viewers with similar conditions to abandon or not seek conventional treatment which, in turn, could cause significant harm to them. In addition, the promise of money could lead viewers to believe their financial difficulties could be resolved by the "Miracle Spring Water" alone, preventing them from taking other steps to address those difficulties and therefore exposing them to the risk of significant harm. Ofcom considers the potential harm arising from these unchallenged and unsubstantiated statements to be particularly serious given that they related to viewers' health and wealth. Secondly, given the religious nature of the Programmes, and that viewers were likely to consider Mr Popoff as a religious person with authority, we considered there was an increased risk that viewers, in particular vulnerable viewers, would be susceptible to these claims about the effectiveness of the "Miracle Spring Water".
61. Thirdly, the likelihood of harm to viewers was increased significantly by the frequency at which the "Miracle Spring Water" was promoted during the Programmes.
62. In accordance with the requirements set in paragraphs 17 to 20, Ofcom has had regard to Articles 9 and 10 of the Convention when reaching a decision on whether the breaches were serious as to impose a statutory sanction. Ofcom must consider to the right to freedom of religion and both the broadcaster's right to freedom of expression and its audience's rights to receive information and ideas when delivering its responsibility to protect audiences from

harmful content. In this case, Ofcom took into account many people find comfort and solace from prayer or a belief in faith healing when ill or encountering financial difficulties.

Repeated nature of the breaches

63. Issue 487¹⁰ of the Broadcast and On Demand Bulletin, published on 4 December 2023, included a decision regarding the broadcast of *Peter Popoff Ministries* on The Word Network on 9 and 10 May 2023. Similar to the Peter Popoff programmes that are the subject of this Sanction Decision, those episodes contained invitations to order the ministry's "Miracle Spring Water" on the understanding it could bring about recovery from illnesses (such as cancer), improve users' financial situation, or assist recovery from drug addiction. Accordingly, Ofcom recorded breaches of Rules 2.1, 4.6 and 9.4 of the Code.
64. The Programmes were broadcast soon after Ofcom notified the Licensee of the Breach Decision on 29 November 2023, and the publication of it on 4 December 2023. The Programmes contained similar claims to the previous programmes found in breach, i.e. that contacting the presenter and using the "Miracle Spring Water" could bring about improvements to viewers' health and wealth.
65. Ofcom found that the Programmes were in breach of Rules 2.1, 4.6 and 9.4 of the Code. Ofcom's Decision is therefore that the multiple breaches of the same Code rules for similar material were clearly repeated in nature.

Reckless and/or deliberate nature of the breaches

66. As noted previously, on 4 December 2023, Ofcom found The Word Network in breach of Rules 2.1, 4.6 and 9.4 relating to the broadcast of *Peter Popoff Ministries* on 9 and 10 May 2023. The Programmes were broadcast by The Word Network soon after the publication of this breach decision.
67. Ofcom therefore considered that senior management ought to have understood and anticipated the potential issues raised under the Code by the broadcast of the Programmes on an Ofcom-licensed service.
68. Ofcom has taken into account the relatively short period of time that had elapsed between the Licensee being made aware of our breach decision and the broadcast of the Programmes. Consequently, while Ofcom considered that the breaches represented a particularly serious and repeated failure of compliance, on balance, our Decision is that the breaches in this case did not go so far as to constitute a reckless act by the Licensee.
69. Ofcom acknowledged the Licensee's submission that it had not intentionally broadcast material that was in breach of the Code. In the absence of any evidence to suggest otherwise, Ofcom's Decision is that the breaches referenced above were not deliberate.

Imposition of sanction

70. In view of the factors set out above, Ofcom's Decision is that the breaches of the Code were serious and repeated and therefore, the imposition of a statutory sanction is warranted. The following paragraphs set out the enforcement action that we have considered and the sanction we have decided to impose.

Imposition of sanctions other than a financial penalty

¹⁰ See footnote 3.

71. As set out in paragraphs 27 to 29 above, Ofcom has powers to impose a statutory sanction on TLCS licensees under sections 236 to 239 of the 2003 Act.

Revocation of a licence

72. 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 the 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 however that it is necessary and in the public interest to revoke the licence.
73. In considering whether it was appropriate to revoke The Word Network's licence, Ofcom took into account Articles 9 and 10 of the Convention:
- Article 9 of the Convention – that everyone “has the right to freedom of thought, conscience and religion”, and Ofcom recognises that many people find comfort and solace from prayer or a belief in faith healing when ill or encountering financial difficulties; and
 - Article 10 of the Convention – the broadcaster's and audience's rights to freedom of expression.
74. We recognise 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 who have a right to receive it.
75. Revocation of a licence is the ultimate enforcement action available to Ofcom. A decision to revoke a licence must 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 and it is necessary in the public interest. 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.
76. Taking account of all relevant factors, while Ofcom considered the breaches to be serious, Ofcom's view is that it would not be appropriate to revoke the licence in circumstances where the other sanctions discussed are sufficient to act as a deterrent against future breaches.

Direction to licensee to take remedial action

77. 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.
78. On 25 February 2025, The Word Network ceased transmission in the UK. On 27 March 2025, it informed Ofcom that it did not intend to resume broadcasting on the Sky platform or on any other regulated EPG. On this basis, Ofcom considers that directing the Licensee to broadcast a correction or a statement of Ofcom's findings, or to not to repeat the Programmes, are not effective remedies.

Imposition of a financial penalty

79. In this case, Ofcom's Decision is that a financial penalty is necessary to reflect the serious and repeated nature of the Code breaches recorded against the Licensee, and to act as an effective incentive to comply with the Code for other licensees.
80. The maximum level of a financial penalty that can be imposed on a licensee in respect of each contravention of a TLCS licence condition is £250,000 or five per cent of the licensee's

qualifying revenue¹¹ relating to its last complete accounting period for which its licence has been in force, whichever is greater.

81. Ofcom's Penalty Guidelines state (in paragraph 11) that: "Ofcom will consider all the circumstances of the case in the round in order 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".
82. As part of the sanction process, Ofcom requested that the Licensee provide its qualifying revenue data for 2024. However, the Licensee did not respond to this request. In the absence of this information, Ofcom has used the most up to date qualifying revenue figure it has received from the Licensee as a basis for determining the maximum level of financial penalty. This figure (£< REDACTED) was its qualifying revenue for the year 2023 and was provided by the Licensee on 30 July 2024 following receipt of Ofcom's Sanction Preliminary View for the broadcast of *Peter Popoff Ministries* on The Word Network on 9 and 10 May 2023.

Factors taken into account in determining the amount of a penalty

83. In considering the appropriate amount of a financial penalty for the Code breaches in this case, Ofcom has taken account of the specific relevant factors set out at paragraph 1.12 of the Penalty Guidelines as set out below:

The seriousness and duration of the contravention

84. Ofcom regards the breaches to be serious for the reasons set out in paragraphs 58 to 62 of this Sanction Decision. Ofcom also considers the breaches related to the broadcast of the Programmes to be repeated for the reasons set out in paragraphs 63 to 65.
85. Ofcom is not aware that The Word Network repeated the Programmes following Ofcom's decision that they were in breach of the Code. However, it is concerned that the Licensee broadcast the Programmes after it was notified by Ofcom of a breach decision on 29 November 2023, concerning other Peter Popoff programmes that contained the same claims, i.e. that contacting the presenter and using the "Miracle Spring Water" could bring about improvements to viewers' health and wealth.

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

86. Ofcom concluded that the Programmes were likely to appeal to potentially vulnerable viewers who might be seeking advice, solutions and solace from financial and health difficulties. The Programmes either stated or strongly implied that serious medical and financial problems could be resolved by using the Ministry's "Miracle Spring Water" or through direct contact with Peter Popoff's Ministry. The potential for harm was therefore significant because vulnerable viewers with similar medical conditions may have interpreted the Programmes to mean that it was unnecessary to rely on or continue receiving conventional medical treatment. While the Programmes did not contain any specific instruction to do so, these viewers may have abandoned or not sought medical treatment as a result.

¹¹ See Section 2 of Ofcom's Statement of Principles related to Qualifying Revenue and Multiplex Revenue. Available at: https://www.ofcom.org.uk/data/assets/pdf_file/0021/36174/qualifying_revenue.pdf

87. Additionally, the promise of a financial windfall may have resulted in financial detriment as it could have led viewers to believe that their financial situations could be resolved, dissuading them from taking other steps to address those situations.

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

88. Ofcom understands that it is a common practice for religious ministries to pay broadcasters to transmit programmes that feature their services and/or religious teachings. Ofcom noted that the following oral and visual statements were broadcast around each programme:
- I. *“The following inspirational message is paid for by Peter Popoff Ministries”* (broadcast at the beginning of each programme); and
 - II. *“This program has been paid for by viewers in this area and Peter Popoff Ministries”* (broadcast at the end of each programme)
89. During the investigations that led to the Breach Decision in this case, Ofcom requested that the Licensee provide information regarding any commercial arrangements it had in place with Peter Popoff Ministries regarding the broadcast of the Programmes. The Licensee failed to provide this information.¹²
90. On 30 August 2024, Ofcom issued a Direction¹³ to the Licensee to provide details of contractual arrangements between Peter Popoff Ministries and the Licensee with regard to the broadcast of *Peter Popoff Ministries*. The Licensee’s response indicated that it had received a contractual fee for the broadcast of the Programmes. According to the information provided, The Word Network charged a total of [§< REDACTED] for the broadcast of the Programmes.¹⁴
91. In its representations, the Licensee said that there “was no payment, sponsorship, or commercial arrangement with either Peter Popoff, his ministries or any third party.” However, this did not appear to correlate with the information that the Licensee had provided about its commercial relationship with Peter Popoff Ministries regarding the broadcast of the Programmes (see paragraph 90).
92. The fact that the Licensee received payment for the broadcast of the Programmes was, in Ofcom’s view, a relevant consideration. However, we concluded that this did not amount to the Licensee having benefitted financially as a result of the breaches.

Whether in all the circumstances appropriate steps had been taken by the regulated body to prevent the contravention

93. During the investigation, the Licensee did not provide representations on how the content complied with the Code when requested to do so by Ofcom.
94. Ofcom acknowledged that in its representations on the Sanction Preliminary View, the Licensee had accepted that the Programmes may have not been sufficiently clear in recommending that viewers should also seek professional medical advice. As set out in the Breach Decision, the Licensee allowed the broadcast of numerous testimonies about the alleged efficacy of contact with Peter Popoff or using “Miracle Spring Water” without any reference to the importance of seeking professional medical or financial advice and with no challenge or other context provided to the claims made. The potential harm to which this

¹² TLCS Licence Condition 12(1) requires the Licensee to provide relevant information to Ofcom on request.

¹³ The Direction to provide this information related to a previous case that Ofcom considered for the imposition of a statutory sanction which is detailed in paragraph 109.

¹⁴ This included the repeat broadcast on 8 December 2023.

gave rise was exacerbated by the fact the Programmes frequently promoted the “Miracle Spring Water” by inviting viewers to order it directly from the Ministry.

95. As set out in paragraphs 63 to 65, the Programmes were broadcast soon after the publication of a breach decision for an almost identical issue on episodes of *Peter Popoff Ministries* broadcast on 9 and 10 May 2023.

96. In light of the above, Ofcom’s Decision is the Licensee did not demonstrate that it had taken 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

97. As stated in paragraphs 63 to 65, and paragraph 95, the broadcast of the Programmes occurred soon after the publication of a breach decision regarding identical issues identified in *Peter Popoff Ministries* broadcast on The Word Network. This decision was communicated to the Licensee on 29 November 2023 and published on 4 December 2023.

98. It is therefore very clear that senior management were, or at the very least should have been, well aware of the potential compliance issues raised by the content of these programmes. However, Ofcom has taken into account the relatively short period of time that had elapsed between the Licensee being made aware of this decision and the broadcast of the Programmes. Consequently, it is Ofcom’s Decision that the contraventions related to these programmes did not occur recklessly.

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

99. As far as Ofcom is aware, the specific episodes in question have not been repeated by the Licensee. However, as stated above, The Word Network broadcast the Programmes after it had been notified by Ofcom that the same issues regarding *Peter Popoff Ministries* transmitted on The Word Network were in breach of the Code.

100. Therefore, Ofcom concluded that The Word Network was aware of a fundamental compliance issue with the format of these programmes but took no action to address it.

Any steps taken for remedying the consequences of the contravention

101. In the investigation, the Licensee did not provide any representations as to how the content complied with the Code, nor did the Licensee comment on Ofcom’s Preliminary View that the Programmes had breached the Code.

102. Ofcom acknowledged that in its representations on the Sanction Preliminary View, the Licensee had said it had improved compliance procedures, however it provided no evidence of this or confirmation of how compliance procedures have been reviewed or improved.

103. The Licensee also stated that “where appropriate, [it had] broadcast clarifications or apologies to address any potential harm”, however, Ofcom is unaware it has broadcast any apology or corrections relating to the Programmes, and The Word Network did not provide a

recording or transmission details of an example of such content, or refer to this when invited to make representations during the investigation.

104. During Ofcom's consideration of sanction relating to *Peter Popoff Ministries* broadcast on 9 and 10 May 2023¹⁵, the Licensee confirmed that, as of 7 October 2024, it had removed the series from The Word Network channel in the UK.

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

105. As noted above, on 4 December 2023, Ofcom published a decision that recorded a breach of Rules 2.1, 4.6 and 9.4 of the Code against the Licensee for the broadcast of *Peter Popoff Ministries* on 9 and 10 May 2023. This decision was communicated to the Licensee on 29 November 2023. Ofcom also imposed a statutory sanction on the Licensee for the broadcast of this material.

106. In Issue 504¹⁶ and 505¹⁷ of Ofcom Broadcast and On Demand Bulletin, published on 19 August 2024 and 9 September 2024 respectively, Ofcom recorded breaches of The Word Network's TLCS licence conditions for failing to provide information to Ofcom upon request.

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

107. In its representations, the Licensee said that it had "cooperated fully" with Ofcom's investigation. However, as noted above, during the investigation, Ofcom made requests for information about any commercial arrangement between Peter Popoff Ministries and The Word Network in relation to these specific broadcasts. The Licensee did not provide this information. In Ofcom's view, the Licensee did not therefore cooperate fully with this investigation.

Precedent

108. In accordance with the Penalty Guidelines, in coming to this Sanction Decision, Ofcom has had regard to relevant precedents set by previous cases, including the following:

109. **11 March 2025, Word Network Operating Company Inc (The Word Network):**¹⁸. Ofcom imposed a sanction that comprised a financial penalty of £150,000, a direction not to repeat the programmes and a direction to broadcast a statement of findings for breaches of Rules 2.1 4.6 and 9.4 of the Code. The breaches related to programmes that included a series of invitations to viewers to contact Peter Popoff Ministries and order "*FREE MIRACLE SPRING WATER*". When inviting viewers to order, Peter Popoff made several claims about its efficacy. 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 contact with Peter Popoff or using the water had cured them of serious illnesses, such as cancer, brought about an improvement to their finances, or assisted their recovery from drug addiction. Ofcom concluded that these claims went beyond proclamations of faith and religious teachings and practice. We considered the programmes improperly exploited the susceptibilities of viewers and had the potential to cause harm without the Licensee

¹⁵ See paragraph 109.

¹⁶ Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/about-ofcom/bulletins/broadcast-bulletins/2024/issue-504/non-provision-of-transmission-and-revenue-data-2023-various-licensees.pdf?v=374438>

¹⁷ Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/about-ofcom/bulletins/broadcast-bulletins/2024/issue-505/provision-of-information-word-network-operating-company-inc-the-word-network.pdf?v=379362>

¹⁸ Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/about-ofcom/bulletins/content-sanctions-and-adjudications/sanction-decision-the-word-network-operating-company.pdf?v=392397>

providing adequate protection (e.g. by not including information on the importance of seeking advice from qualified professionals).

110. **5 December 2022, Loveworld Limited (Loveworld):**¹⁹ Ofcom imposed a sanction that comprised a £15,000 financial penalty and a direction to broadcast a statement of findings for breaches of Rules 2.1 and 4.6 of the Code. The breaches related to a programme presented by two pastors that 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. This was accompanied by claims that the donations would improve the donor's health, wealth and success. 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: A person 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.
111. **15 October 2019, Greener Technology Limited (BEN TV):**²⁰ Ofcom imposed a sanction that comprised a financial penalty of £25,000, a direction not to repeat the programme and a direction to broadcast a statement of findings for breaches of Rules 2.1, 4.6 and 9.4 of the Code. The breaches related to a programme that included a series of invitations to viewers to order Peter Popoff Ministries "FREE MIRACLE SPRING WATER". These invitations 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 noted that Peter Popoff repeated and/or clarified the claims made by the attendees (e.g. "Did you hear that? She had a tumour...after she used the "Miracle Spring Water", it was gone"). Ofcom concluded that viewers might be led to believe that serious illnesses could be cured solely through using the "Miracle Spring Water" and that it was unnecessary to rely on, or to continue receiving conventional medical treatment. Ofcom considered that there was potential for harm, particularly to those viewers who may be suffering from health issues and may have been vulnerable. Ofcom concluded that there was a material risk that susceptible members of the audience may have been improperly exploited by the programme.
112. **29 July 2015, Asia TV Limited (Lamhe TV):**²¹ Ofcom imposed a penalty of £25,000 on the Licensee for a breach of Rule 2.1 of the Code. We identified a number of claims made by ayurvedic practitioner Dr Naram in the programme, that certain alternative remedies (promoted and sold by Dr Naram) could cure, successfully treat or prevent two serious medical conditions, cancer and hernias. Ofcom found that this had amounted to unqualified medical advice and was concerned that the impact of the advice was increased by Dr Naram's claim to having had over "75,000 cancer patients", some of whom had been told by hospitals that "they won't live for three months...[but] after 15 years [are] leading normal

¹⁹ Available at: https://www.ofcom.org.uk/data/assets/pdf_file/0029/248681/Sanction-Decision,-Loveworld-Limited,-4-September-2021.pdf

²⁰ Available at: https://www.ofcom.org.uk/data/assets/pdf_file/0023/171734/sanction-decision-greener-technology.pdf

²¹ Available at: https://www.ofcom.org.uk/data/assets/pdf_file/0021/67251/asia_tv_limited.pdf

lives". As a result of the claims made by Dr Naram, we considered that some viewers with serious medical conditions may have foregone, delayed or not sought conventional medical treatment on the basis of what they had seen. Ofcom concluded that there was a material risk that susceptible members of the audience may have been exploited by the programme.

113. **6 February 2012, The Light Academy Limited (Believe TV):**²² Ofcom imposed a sanction of £25,000 and a direction to broadcast a statement of findings for breaches of Rules 2.1 and 4.6 of the Code. This case concerned a number of programmes which included testimonies from congregation members of churches proclaiming how the healing or treatment of very serious illnesses, including cancer, diabetes and heart problems, could be achieved by being anointed with a product such as olive oil soap or Ribena. Ofcom concluded that some viewers may have reasonably understood that serious medical conditions could be healed through faith healing or healing with special products alone and that conventional medical treatment could be abandoned, or not sought, in favour of faith healing or using special products alone. Further, given the religious context of the claims made, Ofcom considered that viewers of the channel would be less likely to question their validity. We therefore concluded that there was a material risk that susceptible members of the audience may be exploited by this content.
114. Ofcom considered the cases outlined in paragraphs 109 to 111 to be the most relevant precedents to the breaches relating to *Peter Popoff Ministries*. Particularly, the cases outlined in paragraphs 109 and 111 because of the religious elements and that the cases concerned the same religious ministry promoting the same product.
115. While Ofcom considered the nature of the content in the cases listed in paragraphs 109 to 111 to be relevant to the current case, we note that, as set out in the Penalty Guidelines, Ofcom may depart from these cases depending on the facts and context of the current cases.

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

116. As set out in the Penalty Guidelines, 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.
117. Although as of 25 February 2025 the Licensee ceased transmission in the UK. Ofcom considers that deterrence remains the central objective as it deters both the Licensee and the wider industry from broadcasting similar material that would result in breaches of the Code.
118. Ofcom's Penalty Guidelines provide that Ofcom will have regard to the size and turnover of the regulated body when considering the deterrent effect of any penalty. We recognise that the penalty must be proportionate, taking into account the Licensee's rights under Article 10, and in this case Article 9, of the Convention. If any financial penalty was to be so high that its effect would be to close the service down, then it might be a disproportionate interference. However, this means that for licensees with greater financial means, any financial penalty may be correspondingly higher to have an appropriately deterrent effect

²² Available at: https://www.ofcom.org.uk/_data/assets/pdf_file/0021/73740/light-academy-limited.pdf

119. In this case, the Licensee failed to provide Ofcom with its qualifying revenue for 2024 when requested to do so. Ofcom has therefore taken into account the Licensee's qualifying revenue for 2023 in determining a penalty amount.

Decision

120. Having regard to all the circumstances referred to above, including the need to achieve an appropriate level of deterrence, the Licensee and audience's Article 9 and 10 rights, the particularly serious and repeated nature of the Code breaches involving potential harm to the audience in this case, and the Licensee's failure to cooperate fully with the investigation, Ofcom's Decision is that an appropriate and proportionate sanction would be **£150,000**.