

Your response

Ofcom's Register of Risks

Question 1:	
i)	Do you have any comments on Ofcom's assessment of the causes and impacts of online harms?
	[X]
ii)	Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
	[X]
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
	[X]

Question 2:	
i)	Do you have any views about our interpretation of the links between risk factors and different kinds of illegal harm? Please provide evidence to support your answer.
	Response: Animal cruelty is broader than overt harm. It includes misinformation on how to keep animals, the selling/giving away of animals on social media with no safeguards for where that pet may end up and in the case of rabbits the sale of hutches and cages too small to house an animal that needs as much space to move about as a dog or cat to display normal behaviours. Society is complicit with casual cruelty that is instilled by adverts, companies and individuals selling items and animals that may result in neglect or harm coming to of those animals by people who see this content online.
ii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
	Response: no

Service's risk assessment

Question 3:	
i)	Do you have any comments on our approach to amending the draft Risk Profiles or our proposed risk factors for animal cruelty?
	[X]
ii)	Please provide the underlying arguments and evidence that support your views.
	[X]
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
	[X]

Question 4:

i) Are the draft Risk Profiles for illegal content sufficiently clear in presenting the relationships between the risk factors and the risk of harm posed by animal cruelty content?

[X]

ii) Please provide the underlying arguments and evidence that support your views.

[X]

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

[X]

Question 5:

i) Do the draft Risk Profiles for illegal content include the risk factors that are most strongly linked to the risk of harm posed by animal cruelty content?

[X]

ii) Please provide the underlying arguments and evidence that support your views.

[X]

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

[X]

The Illegal Content Judgements Guidance (ICJG)

Question 6:

i) Do you agree with our proposals? Please provide the underlying arguments and evidence that inform your view.

[X]

ii) Please provide the underlying arguments and evidence that support your views.

[X]

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

[X]

Question 7:

i) Do you consider the guidance to be sufficiently accessible, particularly for providers with limited access to legal expertise?

Response: yes

ii) Please provide the underlying arguments and evidence that support your views.

Response: n/a

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)

Response: no

Question 8:

i) What do you think of our assessment of what information is reasonably available and relevant to illegal content judgements?
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Response: comprehensive if including elements of casual cruelty (neglectful keeping /advice) that can lead to an animal being deemed of less sentient value than another animal and thus more exposed to more extreme instances of neglect or cruelty.

ii) Is this response confidential? (if yes, please specify which part(s) are confidential)
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Response: no
