

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?

Response:

The Links Group is pleased to respond to this consultation looking at the Ofcom assessment of the implementation in the Online Safety Act 2023 of S4 Animal Welfare Act 2006 offences in online content.

The Links Group is a charity registered in England and Wales number 1196067. Since 2001, we have been raising awareness about the link between the abuse of people and animals by providing research, resources and training to promote the safety of people and animals.

In the last 12 months, we have trained over 3,700 professionals working in the fields of safeguarding people and animal including veterinary colleagues, animal welfare organisations, domestic and sexual abuse services, police, social workers, housing teams, health workers, substance misuse services and more, nationally and internationally. We have delivered training on non-accidental injury and "the link" to over 1,200 veterinary undergraduates in all fully accredited UK veterinary schools. Our pet fostering members include Dogs Trust Freedom, Cats Protection Lifeline, Endeavour and Refuge4Pets, who all work to our minimum service standards. Collectively, in 2023, the specialist domestic abuse animal fostering services supported over 700 families with over 950 animals.

We have strong relationships with the RSPCA and SSPCA via shared goals and the natural overlap in our work. Both organisations have worked with us to deliver our multi-agency training days for veterinary teams on non-accidental injury and the link between abuse of animals and abuse of people. For these reasons, The Links Group is supportive of the RSPCA's and SSPCA's responses to this further consultation and we submit our response in this vein.

This response uses feedback and information gathered from:

- delivery of our services and training,
- from experiences gathered through supporting with cases of suspected animal abuse/non-accidental injury, including through the Non-Accidental Injury Helpline service provided by IVC Evidensia for all members of the veterinary team in the UK and beyond,
- trustees' experiences of working alongside prosecutions, including in an expert witness role,
- knowledge of existing and forthcoming research.

Given the Links Group's collective expertise regarding the link between abuse of animals and abuse of humans, we are happy to offer further support in this area as required.

The Links Group agrees with Ofcom's assessment to include animal cruelty as a risk factor within the U2U profile. We disagree that only live acts meet the thresholds in the Act of encouraging/assisting or conspiring to commit acts of cruelty and are then defined as priority issues.

We are aware that online animal cruelty content is extensive. In the Social Media Animal Cruelty Coalition 2021 report, dogs and cats were some of the most commonly featured animal types. Between July 2020 and August 2021, 5480 instances of animal cruelty content were found on YouTube, Facebook or TikTok. At the time of the report, these 5,480 videos had been viewed 5,347,809,262 times.

We believe that there may be grounds to lower the thresholds for content that could be deemed as "encouraging" further animal cruelty. Identifying all animal cruelty content as "encouragement, incitement, or conspiracy" would force social media companies to moderate animal cruelty more effectively.

We also refer to and support the RSPCA's and SSPCA's responses to this question.

In addition, we note point, Section 4.7 on page 14 of the Illegal Harms Further Consultation document:

4.7 Stakeholders raised various concerns around the risks of animal cruelty content online. They flagged the sometimes extreme suffering of the animals involved, including where the cruelty is not obvious to viewers. They noted the impacts of viewing animal cruelty content on users of online services such as psychological distress, desensitisation, or even potentially leading someone to commit further animal cruelty offences or other offences such as cruelty to humans.

It should be noted that there is a paucity of academic research relating specifically to viewing animal abuse online. Much of the existing research relates to the impact on children, and to prison populations in the United States. The quality of the evidence available in the literature on the impact of witnessing animal abuse must be considered carefully. In particular, consideration must be given to differing theoretical and methodological approaches. The following five papers are relevant to the consultation and merit evaluation.

Hensley, C., Tallichet, S. E., & Dutkiewicz, E. L. (2012). [Exploring the age of onset and recurrence of childhood animal cruelty: Can animal cruelty be learned from witnessing others commit it?](#) *International Journal of Offender Therapy and Comparative Criminology*, 56(4), 614–626.

Pagani, C., Robustelli, F., & Ascione, F.R. (2015). [Investigating Animal Abuse: Some Theoretical and Methodological Issues](#). *Anthrozoös*, 23(3), 259-276.

Browne, J. A., Hensley, C., & McGuffee, K. M. (2017). [Does witnessing animal cruelty and being abused during childhood predict the initial age and recurrence of committing childhood animal cruelty?](#) *International Journal of Offender Therapy and Comparative Criminology*, 61(16), 1850–1865.

Ascione, F. R., McDonald, S.E., Tedeschi, P., & Williams, J.H. (2018). [The relations among animal abuse, psychological disorders, and crime: Implications for forensic assessment](#). *Behavioural Sciences and the Law* 36(6), 717-729.

Wauthier, L.M. & Williams, J.M. (2021). [Understanding and Conceptualizing Childhood Animal Harm: A Meta-Narrative Systematic Review](#), *Anthrozoös*, 35(2), 165-202.

ii)	Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.
Response:	
<p>The Links Group disagrees that only live acts meet the thresholds in the Act of encouraging/assisting or conspiring to commit acts of cruelty and are then defined as priority issues.</p> <p>We also refer to and support the RSPCA's and SSPCA's responses to this question.</p>	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response:	
No	

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:	
<p>As stated in the response to Question 1, The Links Group agrees with Ofcom's assessment to include animal cruelty as a risk factor within the U2U profile. We disagree that only live acts meet the thresholds in the Act of encouraging/assisting or conspiring to commit acts of cruelty and are then defined as priority issues.</p> <p>We refer to and support the RSPCA's and SSPCA's responses to this question.</p> <p>We also highlight the need for a critical appraisal of the evidence which exists in respect to the impact of witnessing animal abuse; and the current lack of research directly relating to the impact of witnessing <u>online</u> abuse, including that occurring on social media platforms.</p>	
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?
Response: The Links Group agrees with the approach to amending the draft Risk Profile.	
ii)	Please provide the underlying arguments and evidence that support your views.
Response: The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response: No	

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?
Response: The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question. The Links Group refers to our responses given to Questions 1 & 2, highlighting the need for a critical appraisal of the evidence which exists in respect. It is imperative that Ofcom recognises the differing theoretical and methodological constructs of much of the available research investigating risk factors, risks of harm and outcomes of witnessing animal abuse. It is also important to be aware of the current lack of research directly relating to the impact of witnessing <u>online</u> abuse, including via social media platforms.	
ii)	Please provide the underlying arguments and evidence that support your views.
Response: The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.	
iii)	Is this response confidential? (if yes, please specify which part(s) are confidential)
Response: No	

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?

Response:

The Links Group agrees to adding animal cruelty as a risk factor to messaging services and social media.

The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.

We re-emphasise our previous comments regarding appropriate selection and analysis of available research investigating risk factors that are most strongly linked to the risk of harm posed by animal cruelty content, and the current lack of research directly relating to the impact of witnessing online abuse, including via social media platforms. We invite Ofcom to consider the research outlined in our response to Question 1.

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

Response:

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

Response:

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.

Response:

The Links Group agrees with the ICJG proposals.

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

Response:

The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.

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

Response:

No

Question 7:

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

Response:

The Links Group does not agree that the guidance is sufficiently accessible, particularly for providers with limited access to the *appropriate* legal expertise.

The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.

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

Response:

The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.

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?

Response:

The Links Group refers to and supports the RSPCA's and SSPCA's responses to this question.

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

Response:

No