

Content warning: this document contains references to content that may be upsetting or distressing, including descriptions of content depicting animal cruelty.

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal call for evidence response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments. Ofcom aims to publish responses at regular intervals during and after the call for evidence period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the call for evidence has closed, please tick here.

Your response

Question	Your response
The incidence of content that is harmful to children on regulated services We invite stakeholders to provide evidence relating to the incidence of PPC, PC or NDC on regulated user-to-user, search or combined services. Please provide as much detail as you can. This could include but is not limited to evidence about:	Based on reports submitted to SMACC by members of the public and our volunteers since July 2025, we continue to receive links to content depicting multiple forms of animal cruelty on regulated services. This ranges from direct physical abuse through to more subtle or less overt forms of cruelty. SMACC is particularly concerned that content depicting physical abuse of animals remains available on mainstream social media services. In our view, such material is consistent with content that is harmful to children and would be expected to be addressed under the protections introduced through the Online Safety Act. In addition, SMACC wishes to highlight the prevalence of content showing animals in clear distress or being handled or treated inappropriately. While this content may not always depict explicit violence, it may still be harmful for children to view where an animal is visibly distressed and the individual filming continues to cause or prolong that distress. The welfare implications are evident, and the content can be upsetting or disturbing for child viewers. Themes of cruelty content reported to SMACC post July 2025 <i>*Note: Most of the links referenced in this submission were reported to SMACC by members of the public. These reports have not been subject to full case-by-case verification or reclassification by SMACC prior to inclusion. However, they are valuable evidence of what users believe they are encountering on social media, and therefore provide important insight</i>

Question	Your response																		
	<i>into real-world exposure, user experience, and perceived availability of animal cruelty content on regulated services.</i> Number of links for selected main theme (as of March 2nd 2026) <table data-bbox="683 421 1557 1005"> <tr> <th data-bbox="683 421 1118 488">MAIN THEME</th><th data-bbox="1118 421 1557 488">AMOUNT</th></tr> <tr> <td data-bbox="683 488 1118 555">Causing/prolonging death</td><td data-bbox="1118 488 1557 555">4,752</td></tr> <tr> <td data-bbox="683 555 1118 622">Deliberate physical abuse</td><td data-bbox="1118 555 1557 622">11,032</td></tr> <tr> <td data-bbox="683 622 1118 689">Deliberate psychological abuse</td><td data-bbox="1118 622 1557 689">4,809</td></tr> <tr> <td data-bbox="683 689 1118 757">Eating live animals</td><td data-bbox="1118 689 1557 757">100</td></tr> <tr> <td data-bbox="683 757 1118 824">Fake rescue</td><td data-bbox="1118 757 1557 824">1,426</td></tr> <tr> <td data-bbox="683 824 1118 891">Monkey hatred</td><td data-bbox="1118 824 1557 891">3,327</td></tr> <tr> <td data-bbox="683 891 1118 958">Teasing</td><td data-bbox="1118 891 1557 958">1,125</td></tr> <tr> <td data-bbox="683 958 1118 1005">TOTAL</td><td data-bbox="1118 958 1557 1005">26,571</td></tr> </table> Content Examples (live as of March 2nd 2026) SMACC and our members are increasingly receiving reports of content that appears to be AI-generated or manipulated, including depictions of animal abuse. While this is a relatively new and rapidly evolving area, we are already concerned about the potential for such content to proliferate across social media services and become more realistic, more shareable, and more widely encountered by children. Even when animals are not physically harmed, portraying animals being abused, tortured, or distressed for entertainment or	MAIN THEME	AMOUNT	Causing/prolonging death	4,752	Deliberate physical abuse	11,032	Deliberate psychological abuse	4,809	Eating live animals	100	Fake rescue	1,426	Monkey hatred	3,327	Teasing	1,125	TOTAL	26,571
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	engagement can reinforce harmful attitudes toward animals and contribute to a culture in which cruelty is trivialised. Some bad actors are already exploiting AI tools to create high volumes of disturbing material, build viral accounts, or combine AI-generated scenes with real footage to evade moderation. In SMACC's view, if the Online Safety Act is intended to prevent children being traumatised by animal abuse content, then realistic AI-generated depictions of animal abuse should be treated in the same way as real footage. Even where no actual animal was harmed in the creation of the content, such material can still be disturbing to children and contributes to the normalisation of animal violence.
The quantity, prevalence or presence of specific kind(s) of PPC, PC or NDC on regulated services and the frequency with which children are encountering this content.	Confidential? – Y / N
How demographic characteristics such as age, gender, race, sexual orientation and disability influence the likelihood that children will encounter specific kind(s) of PPC, PC or NDC.	Confidential? – Y / N
The services or types of service where children are most likely to encounter specific kind(s) of PPC, PC or NDC.	Confidential? – Y / N
The severity of harm that UK children suffer,	Ofcom has already recognised the harm that viewing animal cruelty content can have on children, through its published <i>Guidance on Content Harmful to Children</i>¹, and its qualitative research report

¹ Ofcom (2025) *Guidance on content harmful to children*. Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/guidance-on-content-harmful-to-children.pdf?v=395445>

Question	Your response
or may suffer, as a result of content that is harmful to children We invite stakeholders to provide any evidence regarding the severity of harm that UK children suffer, or may suffer, as a result of encountering PPC, PC or NDC. Please provide as much detail as you can. This could include but is not limited to evidence about:	<i>Understanding Pathways to Online Violent Content Among Children.</i>² SMACC strongly supports this assessment and wishes to reaffirm our position, and the supporting evidence we have previously submitted, in response to this call for evidence. SMACC considers that exposure to online animal cruelty content can cause serious psychological harm to children and young people, and may contribute to harmful behavioural outcomes. The harm inherent in viewing animal cruelty has been studied extensively, with children shown to be particularly susceptible to negative impacts. Our previous submissions cited evidence indicating that children who witness animal abuse may be at greater risk of committing violence toward animals and humans, and that exposure may contribute to desensitisation and the normalisation of violence. This includes evidence and literature discussing links between witnessing non-sexual and sexual animal abuse, maladaptive behaviours, and broader psychosocial harms.^{3 4 5 6} Children learn in part through observation, and repeated exposure to behaviour, particularly when it appears normalised, can shape developing behavioural scripts. During childhood and adolescence, executive functioning and moral reasoning are still maturing, and heightened brain plasticity increases sensitivity to environmental inputs.⁷ Consequently, repeated exposure to depictions of cruelty may influence emotional responses and normative interpretations at

² Ofcom (2024) *Understanding pathways to online violent content among children*. Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/keeping-children-safe-online/experiences-of-children/understanding-pathways-to-online-violent-content-among-children.pdf?v=368021>

³ Hodges, C. (2008) 'The link: cruelty to animals and violence towards people', *Animal Legal & Historical Center*. Available at: <https://www.animallaw.info/article/link-cruelty-animals-and-violence-towards-people>

⁴ Johnson, S.A. (2018) 'Animal cruelty, pet abuse & violence: the missed dangerous connection', *Forensic Research & Criminology International Journal*, 6(6), pp. 403–415. doi: 10.15406/frcij.2018.06.00236. Available at: <https://www.researchgate.net/publication/329457813>

⁵ Holoyda, B., Gosal, R. and Welch, K.M. (2020) 'Bestiality among sexually violent predators', *Journal of the American Academy of Psychiatry and the Law*, 48(3), pp. 358–364. doi: 10.29158/JAAPL.003941-20. Available at: <https://pubmed.ncbi.nlm.nih.gov/32409303/>

⁶ Napier, S.S., Seto, M.C., Cashmore, J. and Shackel, R. (2024) 'Characteristics that predict exposure to and subsequent intentional viewing of child sexual abuse material among a community sample of Internet users', *Child Abuse & Neglect*, 156, 106977. doi: 10.1016/j.chiabu.2024.106977. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0145213424003673>

⁷ Bandura, A., Ross, D., & Ross, S. A. (1961). Transmission of aggression through imitation of aggressive models. *Journal of Abnormal and Social Psychology*, 63(3), 575–582.

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	a formative stage.⁸ It is important to note that this does not exclusively refer to violence to animals, but should also be considered for other forms of animal cruelty witnessed by children, such as mishandling, neglect, and animals in distress in response to human actions. Empirical studies associate children's exposure to animal cruelty with increased externalising behaviours, internalising symptoms, and callous-unemotional traits, which are linked to reduced empathy and diminished responsiveness to suffering. Reviews similarly identify exposure to animal cruelty as a developmental risk factor rather than a neutral experience.⁹ The 2025 RSPCA Kindness Index (as previously referenced by SMACC) further supports the relevance of this issue to children's lived experience, including evidence that children and young people are witnessing animal cruelty online, including on social media.¹⁰ In addition, the severity of harm should be understood in the context of the well-established overlap between violence to animals and violence to humans, particularly in domestic abuse settings. Animal abuse may be used as a means of coercion, intimidation, and psychological harm, and evidence reviews and legal/practice-focused sources consistently identify animal abuse as part of broader patterns of family violence and victimisation.^{11 12} SMACC also notes evidence that childhood exposure to maltreatment of companion animals is associated with psychopathology in childhood and adulthood, and that children exposed to domestic violence may be at increased risk of

⁸ McDonald, S. E., et al. (2017). The role of callous-unemotional traits in mediating the association between children's exposure to animal maltreatment and externalizing and internalizing problems. *Child Psychiatry & Human Development*, 48(5), 683–694.

⁹ Ladny, R. T., & Meyer, C. (2019). Traumatized witnesses: Review of childhood exposure to animal cruelty. *Journal of Child & Adolescent Trauma*, 13, 433–444.

¹⁰ RSPCA (2025) *Kindness Index Report 2025*. Available at: <https://www.rspca.org.uk/whatwedo/latest/kindnessindex/2025/reportrspca.org.uk>

¹¹ Hodges, C. (2008) 'The link: cruelty to animals and violence towards people', *Animal Legal & Historical Center*. Available at:

<https://www.animallaw.info/article/link-cruelty-animals-and-violence-towards-people>

¹² Johnson, S.A. (2018) 'Animal cruelty, pet abuse & violence: the missed dangerous connection', *Forensic Research & Criminology International Journal*, 6(6), pp. 403–415. doi: 10.15406/frcij.2018.06.00236.

Available at: [https://www.researchgate.net/publication/329457813_Animal_cruelty_pet_abuse_violence_the_missed_dangerous_connection\(PDF\)](https://www.researchgate.net/publication/329457813_Animal_cruelty_pet_abuse_violence_the_missed_dangerous_connection(PDF))

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	concomitant exposure to animal maltreatment and related harms.¹³ ¹⁴ SMACC also draws attention to evidence from child protection and exploitation contexts showing overlap between the victimisation of animals and children in some cases involving sexual abuse material and related offending. For example, a ProtectChildren.ca summary of Canadian case law observations reports substantial overlap between bestiality-related offending and child sexual abuse in the cases reviewed.¹⁵ The broader literature on the human–animal violence link identifies significant associations between animal cruelty and other forms of interpersonal violence, including child maltreatment and domestic abuse.^{16 17} Repeated exposure to cruelty toward animals may therefore contribute to the normalisation of aggression within an existing ecology of violence.¹⁶ Research also indicates that engagement with extreme content can contribute to desensitisation over time.¹⁰ In digital environments, exposure is often amplified through algorithmic recommendation and engagement-driven design, increasing both frequency and perceived normality.¹⁸ A child-rights-based approach also supports treating this as a serious issue. Article 19 of the UN Convention on the Rights of the Child, which the UK signed in 1990 and ratified the following year, requires States Parties to ‘take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence...’. In August 2023, the UN Committee on the Rights of the Child issued a number of comments relating to the implementation of the Convention, including General Comment 26, paragraph 35 of which states:

¹³ McDonald, S.E., Dmitrieva, et. al. (2018) ‘The role of callous/unemotional traits in mediating the association between animal abuse exposure and behavior problems among children exposed to intimate partner violence’, *Child Abuse & Neglect*, 79, pp. 421–432. Available at:

<https://www.sciencedirect.com/science/article/abs/pii/S0145213417303356?via%3Dihub>

¹⁴ Currie, C.L. (2006) ‘Animal cruelty by children exposed to domestic violence’, *Child Abuse & Neglect*, 30(4), pp. 425–435. doi: 10.1016/j.chiabu.2005.10.014. Available at:

[https://pubmed.ncbi.nlm.nih.gov/16600374/Animal cruelty by children exposed to domestic violence - PubMed](https://pubmed.ncbi.nlm.nih.gov/16600374/Animal%20cruelty%20by%20children%20exposed%20to%20domestic%20violence-PubMed)

¹⁵ Canadian Centre for Child Protection (no date) “Bestiality” as reflected in Canadian case law. Available at: <https://protectchildren.ca/en/resources-research/bestiality-in-case-law/>

¹⁶ Longobardi, C., & Badenes-Ribera, L. (2019). The relationship between animal cruelty in children and adolescents and later interpersonal violence: A systematic review. *Aggression and Violent Behavior*, 46, 1–11.

¹⁷ Jegatheesan, B., Enders-Slegers et. al. (2019). Traumatized witnesses: Review of childhood exposure to animal cruelty. *Journal of Child & Adolescent Trauma*, 13, 433–444.

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	'Children must be protected from all forms of physical and psychological violence and from exposure to violence, such as domestic violence or violence inflicted on animals.'^{18 19} Taken together, this evidence indicates that the severity of harm is not limited to immediate distress from viewing violent content. Exposure to animal cruelty content may also contribute to desensitisation, normalisation of violence, and wider risks within harmful online and offline abuse ecosystems.
The impact that specific kind(s) of PPC, PC or NDC can have on a child's wellbeing, behaviours, or other physical or psychological outcomes. This might include evidence concerning cumulative exposure to specific kind(s) or combinations of PPC, PC or NDC.	Confidential? – Y / N
Any causal links between a child encountering specific kind(s) of PPC, PC or NDC and subsequently suffering physical or psychological harm.	Confidential? – Y / N
How demographic characteristics such as age, gender, race, sexual orientation and disability can influence the severity of harm that UK children suffer, or may suffer, as a result of encountering specific kind(s) of PPC, PC or NDC.	Confidential? – Y / N

¹⁸ Committee on the Rights of the Child (2023) *General comment No. 26 (2023) on children's rights and the environment with a special focus on climate change* (CRC/C/GC/26). Available at: <https://docs.un.org/en/CRC/C/GC/26><https://docs.un.org/en/CRC/C/GC/26>

¹⁹ Committee on the Rights of the Child (2023) *General comment No. 26 (2023) on children's rights and the environment with a special focus on climate change* (CRC/C/GC/26). Available at: <https://www.ohchr.org/en/documents/general-comments-and-recommendations/crccgc26-general-comment-no-26-2023-childrens-rights>

Question	Your response
Whether it is appropriate to make changes to the kinds of PPC and PC in the Act We invite stakeholders to provide evidence that suggests any kind(s) of PPC and/or PC in the Act are inappropriate or incorrectly categorised. This could include but is not limited to evidence indicating that:	SMACC considers that there is a basis for Ofcom to examine whether the current PPC/PC categories adequately capture the range of animal cruelty-related content that may be harmful to children. Content depicting real or realistic serious violence or injury to animals is clearly relevant and should remain within scope as harmful content. However, SMACC is concerned that other forms of animal cruelty-related content may also be harmful for children to view, even where the content does not meet the narrow threshold of extreme violent depiction. This may include content showing: • Rough handling or forcing animals into frightening interactions (animals visibly panicking/trying to escape) • Prolonged confinement in clearly unsuitable conditions (e.g., severe overcrowding, filth, deprivation) • Deliberate provocation of distress (chasing, startling, restraining, tormenting) • Content that depicts neglect as normal (untreated injuries, extreme emaciation, obvious illness) • “Care” content that is actually harmful (unsafe “home remedies,” painful “treatments” done for views) • “Cute” wildlife handling that shows clear distress and inappropriate captivity (animals as props) • Staged or fake rescue scenarios in which animals are placed in danger or suffering for content creation. Such content may still be upsetting, distressing, or psychologically harmful to children, and may contribute to the normalisation of mistreatment of animals, as outlined in the response to question two above. Even where content does not depict explicit violence or injury, children can still experience significant distress when an animal is clearly frightened, suffering, or in danger. The child could be upset by the animal’s visible distress and the human’s intentional continuation of harm - not only by blood, injury, or graphic violence. A lot of harmful content is framed as “funny,” “cute,” or “normal,” but involves mistreatment (rough handling, terrifying animals, forcing interactions, baiting, confinement, deprivation). This can be particularly harmful for children because it presents cruelty as entertainment, blurs the line between acceptable and unacceptable treatment, and reinforces harmful norms about animals as props. Online cruelty content is often short-form, repeatedly re-uploaded, edited to avoid obvious “graphic violence” cues, presented with

Question	Your response
	misleading captions (“educational,” “rescue,” “animal care”), and circulated in ways that make it easy for children to encounter. A narrow “graphic violence/injury” threshold risks missing the kinds of content that are most common and most likely to be normalised. SMACC therefore encourages Ofcom to consider whether the current PPC/PC categories adequately capture these realities, including emerging formats such as realistic AI-generated depictions of animal abuse, where the child harm may be comparable even if the production did not involve harm to a real animal.
Any kind of PPC or PC in the Act should cease to be categorised as content harmful to children.	Confidential? – Y / N
Any kind of PPC would be more appropriately categorised as PC.	Confidential? – Y / N
Any kind of PC would be more appropriately categorised as PPC.	Confidential? – Y / N
We invite stakeholders to provide evidence in support of additional kind(s) of content being added to the PPC or PC categories in the Act. This should include, but is not limited to:	
Evidence that the kind(s) of content pose a material risk to an appreciable number of children.	Confidential? – Y / N
Evidence that the kind(s) of content pose a risk of significant harm to children.	Confidential? – Y / N
Evidence to support each kind of content being categorised as either PPC or PC.	Confidential? – Y / N

Please tell us how you came across about this call for evidence.

- ☒ Email from Ofcom
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- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
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