



Joint Select Committee on Social Media and Australian Society
PO Box 6100
Parliament House
Canberra ACT 2600

26 June 2024

Snap Inc. Submission to the Joint Committee on Social Media and Australian Society

Thank you for the opportunity to present a submission to the Joint Committee on Social Media and Australian Society.

The effect of social media on Australian society is an important issue. Right now, many Australians are concerned about the impact of social media on our lives, and the lives of our teens. At Snap, our goal is that Australians can engage in a safe, positive, and creative way on Snapchat. We have carefully considered the architecture of our app, the design of our products and features, and our content and conduct policies and their enforcement, to create an experience that stands apart from traditional social media. We are committed to being part of the solution for online safety, and we welcome this Inquiry.

Snapchat was built to be the antidote to traditional social media platforms, and our app is intentionally designed very differently. Snapchat is a visual messaging app for communicating with friends and family. It's not designed to connect people with others they don't know in real life, or to broadcast and share unvetted content to large groups of people. Snapchat also doesn't offer social comparison metrics – such as public “likes” and unfiltered comments on Snaps or Stories – which can add to social pressure. We believe that the way Snapchat is designed makes the app a safer and more positive environment than traditional social media.

We work hard to help keep Snapchatters safe, and continue to invest in our teams that respond to safety issues and support local law enforcement agencies. We think it is critical to have on-the-ground Trust & Safety and Law Enforcement Operations teams in Australia, based in our Sydney office.

The way in which media publisher content is made available on Snapchat works very differently from traditional social media platforms. We work closely with media partners, including *news.com.au* and *Vogue Australia*, to deliver personalised and relevant content on our Discover platform. We have clear agreements in place with our media partners, and share revenue generated through the content equitably.

As a company, we are always striving for new ways to help keep our community safe, and we acknowledge this work never ends. We welcome the opportunity to share our perspectives with the Committee and answer your questions to help deliver a set of informed, practical, and evidence-based recommendations.

Snapchat is designed differently

When our co-founders Evan Spiegel and Bobby Murphy started building Snapchat more than a decade ago, they wanted to design an app that addressed some of the problems they experienced on social media as teenagers. At the time, there was no alternative to social media,

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which meant pictures shared on these platforms were public, permanent, and subject to popularity metrics such as “like” counts.

We intentionally built Snapchat differently – to be a visual messaging app where people could communicate with their real friends in a creative, authentic and fun way, without social pressure. A picture is worth a thousand words, so people communicate with images and videos on Snapchat. We also decided to have Snaps (visual messages) delete by default after viewing, helping people share moments that may not be “picture perfect,” but, instead, convey emotion without being recorded permanently and replicating the spontaneity of real life.

In 2024, the way Snapchat functions continues to stand apart from traditional social media:

- **Snapchat is primarily used as a messaging service to talk with friends, and always has been.** It’s not intended to be used by people to find new friends, or to share ideas or information with huge groups of people.
- **Snapchat doesn’t open to a “feed” of other people’s content**, encouraging users to passively scroll. Instead, the app opens to a camera, encouraging people to engage with the world around them and send a picture or short video to a friend.
- Unlike other platforms, **we don’t apply an algorithm to a feed of unvetted or unmoderated content.** Content on Discover and Spotlight, which are the more public areas of our platform where we apply algorithms to serve content, is curated and moderated, respectively, before being recommended for distribution to a large audience. This helps prevent the spread of harmful content including misinformation, hate speech, and self-harm.
- **Snapchat doesn’t have public social comparison metrics that can increase social pressure**, like public “likes” or comments on friends’ Snaps or Stories, or visible friends lists.

“Safety by design” – putting user safety at the heart of the design and development of online platforms and services, a concept championed by the eSafety Commissioner – has been foundational to Snapchat’s approach from the beginning. We place the safety and wellbeing of our community at the forefront of our product development processes, and put all new features through rigorous reviews, as part of our commitment to safety by design principles.

Snapchat provides an opportunity for young Australians to connect

We can all acknowledge that the younger generation communicates very differently than we did as young people. Very few teens these days dial a number on a landline to catch up with their friends; research shows that Gen Z Australians prefer keeping in touch via messaging to traditional phone calls.¹

Snapchat offers Australians who are 13 and older a place to connect in a fun, authentic, and creative way with the most important people in their lives, in a secure and positive environment. Importantly, Snapchat provides a generation that is facing rising levels of loneliness with the opportunity to connect. Recent data from the Australian Institute of Health and Welfare (AIHW)

¹ [Research from CommBank and More](#), June 2023

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shows an increasing number of people aged 15-24 have reported experiencing loneliness since 2012, with 1 in 5 males and 1 in 6 females in this age group experiencing loneliness.²

Snapchat's main function is visual messaging for communication with close friends and family. Research published earlier this year by the National Opinion Research Center (NORC) at the University of Chicago showed that three in five teens and young adults (62%) feel happy or extremely happy when direct messaging with family and close friends, making this the most enjoyed feature of online communication platforms. In contrast, far fewer felt happy scrolling through their content feed (38%), looking at content produced by celebrities or influencers (30%), or following the news through their timeline or feed (25%).³

At a time when more and more people are feeling lonely and disconnected, we believe that Snapchat provides an important platform for young people: a way to enhance their relationships with their real friends. The unique features of Snap's design – focusing on encouraging direct communication rather than scrolling through content feeds, avoiding social comparison metrics that can add to social pressure – contribute to an environment that prioritises connection with real friends.

We require all Snapchat users to be at least 13 years old, and if we identify that someone who's using Snapchat is younger than that, we'll shut down their account. For those over the age of 13, we appreciate that the age at which young people start using Snapchat will often come down to a decision between parents and their teens. We recognise our role in supporting an informed conversation, and we provide parents with tools and resources, including through our online [Parent's Guide](#) and in-app Family Centre, to help make appropriate choices for their teens. Through these tools, our aim is to encourage open and honest conversations between parents and their teens about their teen's Snapchat presence.

Critically, though, at Snap we feel a great responsibility to provide and promote a safe and positive Snapchat experience for our community, and we are continuing to invest to do just that.

We make deliberate design decisions to help keep teenagers safe

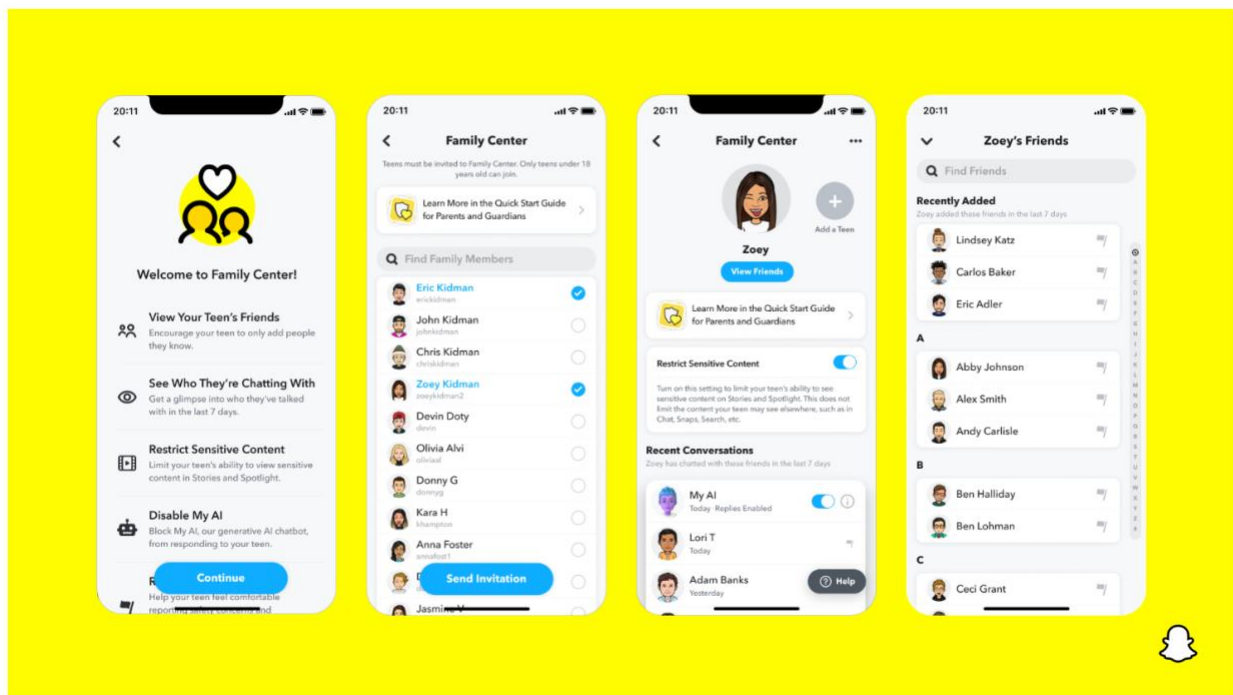
Working to ensure the safety of young people on Snapchat is a top priority. We continue to make design choices, applying safety by design principles, to help keep teenagers safe:

- **We've designed Snapchat to make it difficult for strangers to find and interact with teens:**
 - Snapchatters' friends' lists are never publicly visible;
 - Teens must proactively add someone as a friend or have them in their contact book to receive a direct message on Snapchat. That's different from traditional text messaging, where anyone who has your phone number can get in touch;
 - Snapchat doesn't allow a teen to surface as a suggested friend or in search results for another user unless they have mutual friends in common; and
 - We also display an in-app warning to teens if someone who has few friends in common tries to contact them.

² [AIHW research on social isolation and loneliness](#)

³ [The role of online communication platforms for interpersonal relationships among teens and young adults](#), NORC at the University of Chicago, January 2024

- **We offer easy-to-use in-app reporting tools**, so users can let us know if something they've seen is of concern, and our team can review quickly. We prioritise reports related to teen safety, and our response times to user reports are industry-leading. Our latest [Transparency Report](#) shows that for every key category of harmful content, the median turnaround time – the time taken by our Trust & Safety team to action a user report – was less than an hour, and in many instances significantly faster.
- **Snapchat's Family Centre empowers parents and caregivers to support their teens' safety.** Family Centre lets parents see their teens' friends on Snapchat and who they have been communicating with over the last seven days, as well as a complete list of group members in group chats their teen is in that have been active over the last week. Parents can directly and confidentially report concerning accounts to our Trust & Safety teams, review their teens' privacy settings, and set content controls. Family Centre is also designed to spark conversations about online safety within families; our research tells us that young people whose parents or carers check in with them about their online activity report greater digital wellbeing.



Parent's view of Snapchat's Family Centre

- **We work with safety experts around the world through Snap's Safety Advisory Board, partnerships, and other collaborations.** Our global [Safety Advisory Board](#) consists of 14 professionals from traditional online safety-focused organisations, technologists, academics, researchers, survivors of online harms, and importantly three members who are young adults and youth advocates. We work with them to seek feedback on important safety features and functionality in our products before they are released, as well as on policy changes and the launch of signature safety initiatives. We are grateful to have two Australian experts on our Safety Advisory Board. They are Professor Amanda Third, Young and Resilient Research Centre, Western Sydney University, and Lucy Thomas OAM, Project ROCKIT. Additionally, we work with a cadre

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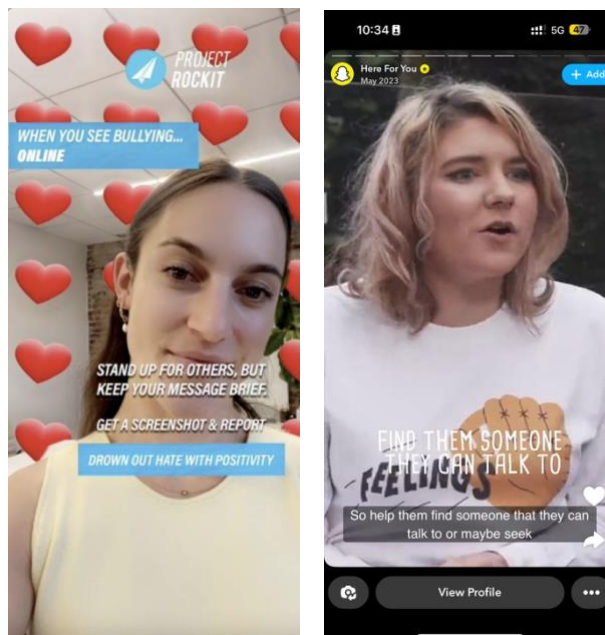
of about 40 other experts from across the globe, seeking input and feedback on Snap's safety-related releases and supporting their various efforts.

Our efforts to reduce the opportunity and impact of bullying

Bullying is against our rules; it has no place on Snapchat, and we have put in place policies and tools to mitigate bullying behaviour while providing resources for those experiencing bullying.

If any Snapchatter experiences or observes bullying, we strongly encourage them to take immediate action to block the offending user, and confidentially report the account, message, or content to our Trust and Safety teams. Our Trust and Safety teams, including a Sydney-based operation, work 24/7 to review reports made by Snapchatters, remove violating content, and take appropriate action.

We have conducted specific anti-bullying campaigns on Snapchat in Australia, including with Project ROCKIT, to encourage young people to stand against this behaviour and call it out when they see it. Our in-app mental health portal, **Here for You**, provides resources from expert organisations, including NGOs based in Australia, for getting help or supporting a friend in crisis.



Examples of in-app campaigns and resources focused on bullying and supporting friends with mental health issues.

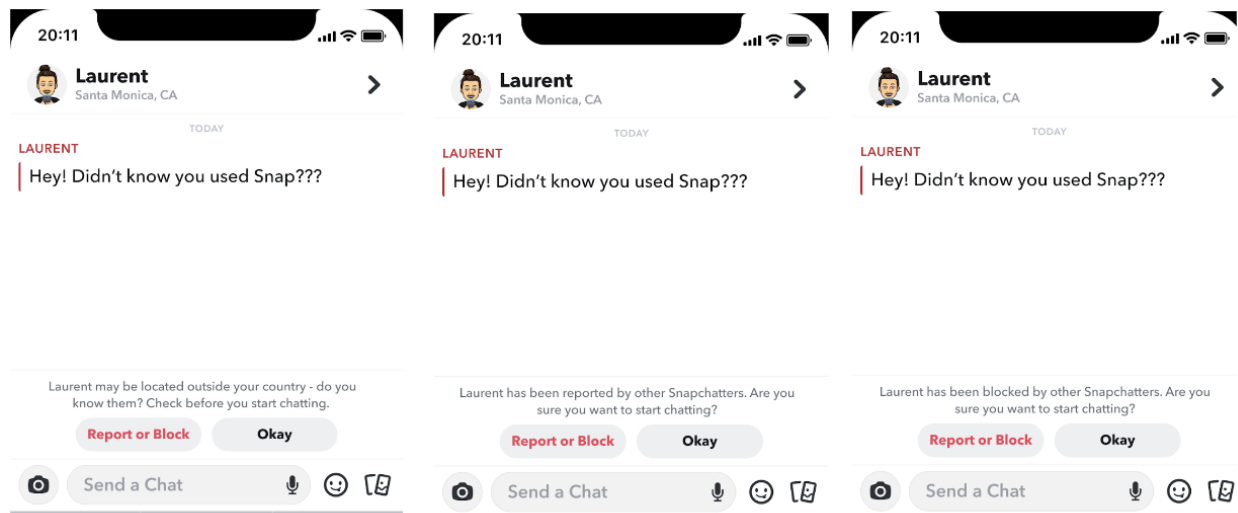
We're committed to addressing the rise in "sexortion"

The rise of financially motivated "sexortion", where criminals pose as young people and coerce victims into sending compromising images, is disturbing and its impact can be devastating.

Often this activity is conducted by criminal networks operating overseas, who threaten to share the images with the victim's friends and family unless they're paid. While Snapchatters' friends' lists are not public, this activity often takes place "across platforms," meaning criminals may initially contact a potential target on a more public platform, and then threaten to share the content with the victim's friends and family as identified on that platform.

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- **We use signal-based detection to identify and remove bad actors before they have the opportunity to target teens and others on Snapchat.** We leverage the U.S. National Center for Missing and Exploited Children (NCMEC)'s [Take It Down database](#), which allows people to generate a digital fingerprint – called a “hash” – of selected nude or partially nude images or videos directly on their devices. Participating companies, including Snapchat, can then use those hashes to look for and remove duplicate imagery.
- **We make it easy to report sextortion through our in-app reporting tools.** Our in-app reporting tools include a tailored confidential reporting category for financial sextortion, and we prioritise reports related to teen safety.
- **We've introduced a pop-up warning when a teen receives a message from someone we think they may not know in real life.** The message flags potential risk for teens so they can carefully consider if they want to be in contact, and tells them to only connect with people they trust. Since its launch in 2023, this feature has empowered millions of Snapchatters to take action, leading to more than eight million blocks. We're expanding these in-app warnings to incorporate advanced signals that may be associated with sextortion. Teens will also see a warning message if they receive a message from someone who's been blocked or reported by others, or is from a region where the teen's network isn't typically located. We're also making the pop-ups more prominent and persistent.
- **We continue to invest in offering educational resources and tools to teens and parents.** For example, four episodes of our in-app [Safety Snapshot](#) series focus on sexual risks and harms like financial sextortion, sexting and the consequences of creating and sharing nudes. Safety Snapshot content in Australia contains advice on reporting to the ACCCE (if the user is under 18) and to the eSafety Commissioner (if 18 or older).



Examples of enhanced in-app warnings on Snapchat

Algorithms work differently on Snapchat, with no feeds of unvetted or unmoderated content

Unlike traditional social media platforms, Snapchat doesn't apply an algorithm to a feed of unvetted or unmoderated content, thereby avoiding a "rabbit hole" effect, where users are drawn deeper into a stream of increasingly extreme or harmful content. Content on Discover and Spotlight, the areas of our platform where we apply algorithms to serve content, is moderated before it is recommended for distribution to a large audience.

Snapchat's algorithms are designed to serve content that is relevant and engaging to users within the moderated environments of Discover and Spotlight, while prioritising a safe and positive user experience. We believe that Snapchat's core architecture and design decisions limit the risk of algorithms that are applied to unmoderated feeds. On platforms where unmoderated content can easily go viral, there is often an incentive for creators to produce extreme content that appeals to people's worst instincts, as this type of content tends to generate more engagement, likes, and comments. By limiting virality on Snapchat, we minimise this incentive.

Balancing user safety, privacy and inclusivity in age verification

Snapchat is not intended for people under the age of 13; we want to keep Snapchatters safe and ensure that people who use our platform are the age they say they are. We require users to input their age before using Snapchat, and we provide a differentiated experience for teens on Snapchat than for adults, with more restrictive content and privacy settings. To help prevent teens from circumventing the teen-specific safeguards we have in place, 13-17 year olds with existing Snapchat accounts are not able to change their date of birth to appear 18 or older.

Snapchat's Family Centre (detailed earlier in this submission) allows parents to view their teens' privacy settings, and see who their teens are friends with and communicating with on Snapchat. If we become aware that someone is using Snapchat who is under the age of 13, we will terminate that user's account and delete their data.

We continue to explore options for age verification, and have been engaging closely with authorities around the world, including the eSafety Commissioner, for many years. Providing effective age verification or assurance that balances user safety, data privacy and security, fairness, accessibility and equity, is a persistent policy challenge with no clear solution.

The eSafety Commissioner's [Roadmap for age verification](#) (March 2023, published in August 2023, alongside the [Government's response](#)) effectively highlights the many challenges. As the Roadmap outlines, there are two primary options when it comes to age verification or assurance:

- **ID-based solutions:** asking users to provide ID to verify their age, and
- **Age-estimation technology:** often involving the use of biometric data, such as a facial scan, to infer a person's age or age range.

As the Government summarised in its response to the Roadmap, "each type of age verification or age assurance technology comes with its privacy, security, effectiveness and implementation issues ... the Roadmap finds that the age assurance market is, at this time, immature." ID-

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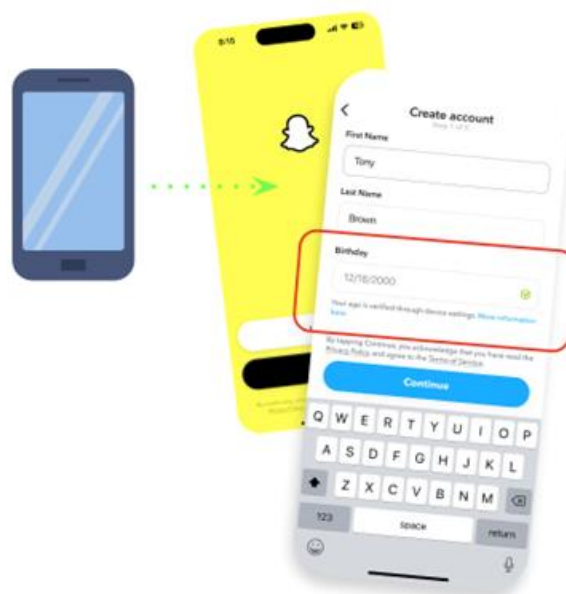
based solutions would require users to input highly sensitive personal documents from passports, driver's licences, or other types of IDs. The privacy risks of asking a wide range of online platforms to hold this information are, in our view, unacceptably high.

With regard to facial-estimation technology, the Roadmap finds this technology is “promising but may offer a lower level of certainty... [it] may not perform well for some skin tones, genders, or those with physical differences.”

At Snap, we are continuing to research options, and are hopeful that we can work together as an industry to develop an effective and practical approach. Our view is that **device level** age verification is the best available option. Age collection is already part of the device ID process when registering a new device, such as an iPhone or Android phone.

Adding a level of age verification to this step, and then making this verified age available to all services, would simplify the process for users, reduce the risk of repeatedly providing sensitive ID data to a wide range of apps, and avoid consent fatigue. Users would only need to confirm their age once, which also increases the odds that the information will be accurate. If age is collected and checked at the device level, then that information could be used within the app store to show apps appropriate for the user's age (meaning that age-inappropriate apps couldn't be accessed or downloaded; users under 13 would be prevented from viewing or downloading apps that are designated 13+).

During the app sign-up process, apps could also receive age signals directly from the device. Moreover, apps could also communicate back to the device operators if they have identified any reason to doubt the assured age signals. If an online communication platform became aware that a user was under their assured age, they could notify the device operator so that the account user's age could be checked again.



Mock-up illustration of how device-level age information could be received at the sign-up level on Snapchat.

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We believe that leveraging the potential of device-level age verification could drive significant progress in what has remained an intractable policy challenge until now. We are committed to working towards a solution that prioritises user safety, privacy, and inclusivity.

We create mutually beneficial relationships with our media partners

The way in which media publisher content is made available on Snapchat works very differently from traditional social media platforms. As we have set out, Snapchat does not have a feed of unvetted or unmoderated content. Instead, our Discover platform is driven by content partnerships. We work closely with media partners from around the world to deliver personalised and relevant content on Snapchat, allowing them to reach new, and typically younger, audiences.

We have clear agreements in place with our media partners, and share revenue generated through the content equitably. We now have more than 900 media partners, including *NBC News*, *Axios*, *ESPN*, *Le Monde*, and *People*, providing trusted news, entertainment and sports content. We have entered into content partnerships in Australia with both *news.com.au* and *Vogue Australia*, both published by News Corp Australia, providing locally relevant and trusted content to our community in Australia.

For more information

Thank you again for the opportunity to present a submission to the Joint Committee on Social Media and Australian Society.

We would encourage the Committee to reach out with any further questions you have.

Henry Turnbull

Head of Public Policy, APAC

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