

Snap Inc.

Lucy Wicks MP
Chair, House Select Committee on Social Media and Online Safety

By email

10 March 2022

Dear Chair,

Thank you for the opportunity to give evidence to the House Select Committee as part of your inquiry into social media and online safety last week. As I said during the session, this is an important inquiry asking some important questions, and I was glad to have the opportunity to contribute. Hopefully, my testimony made clear that Snap approaches safety very differently from many other online platforms. Our safety by design principles guide the development of any new product and feature on Snapchat. This is reflected in an app which is designed to prevent harmful content and activity before it can occur, rather than simply reacting to it once it has already happened. Of course, we are always striving for new ways to keep our community safe, and we have more work left to do.

During the hearing, I undertook to answer some questions on notice. I was asked about:

1. Snap's approach to safety by design for users under the age of 18.
2. How to address the gap between what the Chair characterised as technology-centred approaches to safety by design, regulatory approaches to online safety, and the lived experience of real people using online services.
3. Whether there were three simple actions the Committee could take that would set a standard to reduce online harm and abuse.

Please find responses to these questions below.

1. Snap's approach to safety by design for users under the age of 18

Given Snapchat's popularity among teenagers, we have dedicated significant time and resources to help ensure that younger people have a safe experience when using the app. Through our safety and privacy by design frameworks, we have made a range of design choices to help keep teenagers safe:

- We intentionally make it harder to find others on Snapchat compared to other platforms. For instance, Snapchatters' friends' lists are only visible to themselves; it's never possible to view another user's friends' list.
- Snapchat does not facilitate messaging from strangers and, by default you cannot receive a message from anyone who you have not accepted as a friend on the app. Friend recommendations are expressly designed to prevent sensitive information including friends lists and geographical information from being shared.

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- Location sharing on Snap Map is off by default, and there is no option on Snapchat to share your location with anyone other than your friends, or a designated sub-set of your friends. We named the default “off” location-sharing setting “**Ghost Mode**”, with a clear accompanying ghost icon, to ensure that it would be understood by younger individuals, to help them make informed choices about whether to use Snap Map, whether to share their location and, if so, with whom.
- Through our simple, intuitive and easy-to-use in-app reporting tools, we give Snapchatters the ability to quickly and easily report any content they find concerning. As we discussed last week, we are conscious that young people can often be reluctant to report harmful content online, and we are continually looking for ways to encourage reporting. In 2021, we launched “**Safety Snapshot**”, a dedicated channel on our Discover page which provides advice for users on keeping their accounts secure in a creative and visually accessible way, designed to appeal to young people; one episode focused on debunking common myths about reporting.
- We make no effort - and have no plans - to market Snapchat to children, and individuals under the age of 13 are not permitted to create Snapchat accounts. When registering for an account, individuals are required to provide their date of birth, and the registration process fails if a user inputs an age under 13. We have also implemented a new safeguard that prevents Snapchat users between 13-17 with existing accounts from changing their birthday to an age of 18 or above. Specifically, if a minor attempts to change their birth year to an age over 18, we will prevent the change.
- We are working to develop tools that will offer parents insight into who their teens are connecting with on Snapchat, while respecting the teen’s privacy. The tools are intended as a conversation-starter among parents/guardians and teens.

2. Addressing the gap between technology-centred approaches to safety by design, regulatory approaches to online safety, and the lived experience of real people using online services.

As discussed during the hearing, I very much agree that it is important not to consider technology in isolation from how people actually interact with online services and behave online. Providers of online platforms need to be listening to the experiences of their users and the perspectives of specialist safety organisations. In parallel, the Government could play a vital role in improving digital literacy and promoting better citizenship online: helping people to understand their responsibilities to each other in an increasingly digital world.

Engaging with users and safety experts

Technology companies should be seeking out feedback on the experiences of their users, working to understand issues and concerns they may be facing, and acting on this feedback in concrete ways in order to address problems and improve their experience online.

At Snap, feedback from our community directly informs Snapchat’s design and our approach to user safety. We regularly conduct research to better understand our audience. Importantly, this research has informed steps we have taken in the app to better protect our community. In 2019, we conducted a programme of research looking at how teens and young adults (people aged 13-24) approach mental health and wellbeing across a range of areas. Our research showed

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that young people are incredibly attuned to, and deeply affected by issues around mental health and wellbeing. It also showed that friends are considered the first line of defence when dealing with these challenges. Rather than going to parents or therapists, young people often turn to their friends first, and having someone to share with was identified as an important first step in addressing these problems.

As a platform designed for communication with close friends, we felt we had a unique opportunity to help address some of these issues, and this insight helped inform our **“Here For You”** initiative, launched in 2020, which we continue to develop and improve. “Here For You” surfaces in-app support to Snapchat users who may be experiencing mental health or emotional issues - or who are curious about those issues and may want to discuss them with a friend. We have worked with *R U OK?* and *Project Rokit* in Australia to design content tailored for younger people, which links to expert resources and advice, and we are looking forward to building on this offering in 2022.

We have another programme of research planned for this year, involving surveying users in countries including Australia to understand the impact of online experiences on digital wellbeing. Again, we will seek to build on this research to develop safety features and processes that enhance the wellbeing of our community.

Similarly, expert safety organisations - many of whom work closely with young people to understand challenges they face online - can provide critical advice and feedback to help platforms improve and respond to problems. At Snap, we work closely with a wide range of organisations dedicated to keeping people safe online. Representatives of several leading NGOs have advised us as part of our dedicated Safety Advisory Board. In 2022, Snap is updating the Board, with the aim of building an expanded and more comprehensive Board with safety experts from around the world, including, we anticipate, in Australia.

Education and digital literacy

An important element of improving the online experience of users is better online education and improvement of digital literacy. It is an uncomfortable truth that the vast majority of “online harms” are ultimately perpetrated not by hardened criminals but by ordinary citizens. We all have a duty to reflect on this. Technology companies have a responsibility to ensure that their services are as safe as possible, but platforms alone cannot change user behaviour. Government and regulatory responses to online safety that focus solely on the responses of platforms do not give sufficient weight to the importance of digital literacy and digital citizenship.

Digital literacy should not just concern functional education about staying safe online. Instead, we need to be helping young people to consider what it means to be a citizen in the digital world, to think about their responsibilities and the impact of their actions on other people online. The approach has worked well for decades offline and could be easily expanded to the online world.

We recognise that there are already many ad hoc efforts and projects - by many different stakeholders - which attempt to improve digital literacy and citizenship, and these should be applauded. Unfortunately, these are often delivered in isolation with a limited application, adding up to less than the sum of their parts than if they combined or better coordinated. Given the public prominence and political involvement in this inquiry, the Committee has the opportunity to drive meaningful change in the Government’s approach to online education.

3. Three simple actions the Committee could take that would set a standard to reduce online harm and abuse

The Committee could take three quick actions that would help to improve the online experience of Australians:

a. Drive increased transparency from across the sector

Tech companies' transparency reports, which detail their responses to illegal and harmful content on their online services, are one of the best indicators we currently have of the issues that different platforms are facing and how effectively they are responding to them.

Currently, Snapchat is the only major platform to provide country-specific breakdowns of content reported and enforced in our [Transparency Report](#), including a dedicated page for [Australia](#). There is no good reason why other major technology companies should not be able to provide these breakdowns. Access to these figures would help provide meaningful data about the effectiveness of efforts to ensure user safety across a range of different platforms popular in Australia.

The Committee could drive increased transparency from across the sector, thereby building greater understanding of safety challenges and opportunities to address these, by calling for all major platforms to break down their transparency reports by country.

b. Call for greater rationalisation and coherence of online legislation and regulation in Australia

As we discussed in detail during the hearing, we do not consider that the current, highly complex and crowded regulatory landscape is the best way to achieve a safer, healthier and more civil online experience for Australians.

The combined effect of this complex environment is to introduce confusion, particularly for smaller companies who cannot rely on large compliance, policy and legal teams to help them make sense of the competing obligations, codes and guidance under each piece of legislation. There is a real danger that smaller companies will fall by the wayside; perversely, this will only serve to entrench the advantages enjoyed by the largest companies who have inspired much of this legislation.

Having one clear, coherent regulatory framework would make it simpler for companies to understand their obligations, as well as making it simpler for the Government, regulators and policymakers to hold companies accountable for their actions, and for consumers to understand their rights. This - rather than complexity - leads to a safer environment for all.

The Committee could call for the Government to conduct a review of the online safety regulatory landscape in Australia, with a view to greater rationalisation and simplification, perhaps through broadening the existing Online Safety Act to establish one central regulatory framework, and sunseting related legislation (for example, the Abhorrent Violent Material Act), elements of which would be incorporated into the new regime.

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c. Improve the Government's approach to online education, digital literacy and digital citizenship

As set out above, we consider that the Committee has the opportunity to drive meaningful change in the Government's approach to online education, digital literacy and digital citizenship, which is a critical component in improving the long-term online experience of Australians.

Conclusion

Thank you again for the opportunity to give evidence to the Committee. I hope that these insights will be helpful to the Committee as you develop your findings. If any members of the Committee have any further questions, please don't hesitate to get in touch.

Yours sincerely,

Henry Turnbull
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