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Inquiry into Social Media and Online Safety

Dear Committee members,

Thank you for the opportunity to contribute to this Inquiry into Social Media and Online Safety.

We are committed to working closely with the Parliament and all parties to promote the well-being of Australians online. Our mission is to organise the world's information and make it universally accessible and useful. We believe the Internet has had, on balance, an immensely positive impact on society; allowing in the past two years especially for connection to our communities, families and loved ones. This connection has been important to the mental health and well being of Australians through our collective experience of the COVID-19 pandemic.

Central to our work is our longstanding commitment to the safety of our users, and nowhere is that more important than when it comes to protecting children and teenagers. We have numerous policies across the breadth of Google products and services that deal with a wide spectrum of harmful content, all of which combine to ensure that we maintain an open and safe community for our users.

We work proactively to anticipate and respond to harmful content and behaviours online. We build transparent, fair, and effective processes to help address such content and behaviour, including to ensure that content that violates the law or our Terms of Service is addressed as quickly as possible. Among other disciplines (including the more obvious roles in our Legal, Compliance, Trust & Safety and Public Policy teams), our internal teams include both technical and non-technical experts who come from child development, child psychology and children's media backgrounds. They work closely with the product teams to ensure that product design reflects an understanding of children's unique needs and abilities and

how they evolve over time. We also work extensively with a global panel of external experts in online safety, content quality, mental health, trauma, digital literacy and child development. This includes Professor Amanda Third, a noted expert in children and technology based at Western Sydney University.

We have made significant investments in technology and human resources, and we regularly engage with policymakers in Australia and around the world on appropriate steps to protect our users. We also work closely with Australian NGOs such as the Alannah and Madeline Foundation, Project Rockit, Kids Helpline and Bravehearts and academic organisations such as the Young and Resilient Research Centre at Western Sydney University and the ARC Centre of Excellence for the Digital Child.

Google is committed to playing our part, and we have demonstrated a long-standing commitment to working with the Australian Parliament to improve the digital ecosystem and afford the appropriate protections to Australians. While Google is supportive of carefully crafted and appropriately tailored regulation, we have not waited for legislation to act in tackling illegal or harmful content.

1. Google's work with the Government to keep Australians safe online

We share the commitment of the Australian Parliament to ensure the well-being of Australians online, and highlight that we are currently participating in nine separate regulatory processes between the Government and industry that address cyber safety and privacy. These processes are:

- Development of industry codes (online safety standards) under the [Online Safety Act](#) (by end 2022). The codes will cover the areas of social media services, search engines, relevant electronic services, hosting services, app distribution platforms, equipment and designated internet services, and will be enforceable by the eSafety Commissioner under the [Online Safety Act](#);
- [Basic Online Safety Expectations consultation](#) to inform the draft of the Online Safety (Basic Online Safety Expectations) Determination 2021 setting out minimum safety expectations for online services providers;
- [Restricted Access Systems Declaration](#) consultation;
- [Development of a roadmap for the introduction of mandatory age verification](#) by the eSafety Commissioner;
- [Review of Model Defamation Provisions](#) led by the NSW Department of Communities and Justice (stage 2 of these reforms is nearing completion and focuses exclusively on the role and responsibilities of digital intermediaries);
- [Online Privacy Bill Exposure Draft consultation](#);
- Consultation on the [Social Media \(Anti Trolling\) Bill](#);
- [Review of the Criminal Code Amendment \(Sharing of Abhorrent Violent Material\) Act 2019](#); and
- The economy wide review of the Privacy Act (Cth) 1988.

While we share the goals of these efforts, an unintended consequence of having such a diversity of approaches is that it becomes more challenging to transform theory into practice. Many of these processes have overlapping areas of interest and are working to different timetables. For example, age verification is proposed within five of these different workstreams with varying timetables for implementation. The lack of a current, clear, evidence-based pathway for delivery makes it more challenging for the industry. A coordinated approach to these issues that is unified under a whole of

Government approach would help to ensure consistency and efficiency as we work together to further improve the online well-being of all Australians.

2. Google's products and policies to keep children safe online

The Internet plays an important role in Australians' lives, supporting their creativity, self-expression, and access to information. For young Australians in particular during the current pandemic, technology has helped kids and teens stay in school through lockdowns and foster continued social interaction with their family and friends. At the same time, we recognise that not all content is appropriate for everyone, and we are committed to helping young people find age-appropriate content and experiences as they explore online.

While we're committed to providing open access to information, we also take seriously our legal obligations and our commitment to protect our users. We have made a significant investment in technology and human resources as part of this commitment, and we have engaged with policymakers in Australia and around the world on the appropriate frameworks and accountability mechanisms for age-restricted material on content sharing platforms.

Overall, our approach to information quality and content moderation aims to strike a balance between ensuring that people have access to the information they need, while also doing our best to protect against harmful content online.

a. Examples of online safety policies implemented by Google Search

- **Safe Search:** Safe Search helps filter out explicit content in Google search results for all your queries across images, videos, and websites. It is already on by default for all signed-in users under 13 who have accounts managed by Family Link — Family Link allows parents to create a Google Account for their child and set digital ground rules as their kids explore online. In the coming months, we will be turning Safe Search on by default for all users that have a declared age on their Google account as under 18 years old.
- **Minor image removal:** Images of minors (below the age of 18) can be removed from Google Image Search results at the request of the minor or their parent or guardian.
- **Non Consensual Explicit Image removal:** People can notify Google about intimate or explicit images and videos that were created or shared without their consent and we remove them from the Search index.
- **National hotlines:** Google has improved visibility of authoritative information, such as suicide hotline Lifeline's phone number, in search results for queries that indicate an intent of self harm.
- **Knowledge Panel:** When a user searches for information about health conditions, symptoms, and medications, they see a prominent Knowledge Panel with information about the topic within their search results. To develop these Knowledge Panels, we sourced health-related facts from reliable sites around the web and then worked with experts at Mayo Clinic to do a final review of the data. Our goal with these features is to help users navigate and explore health conditions related to their symptoms, and quickly get to the point where they can do more in-depth research on the web or talk to a health professional.

- **Content policies:** We enforce content policies on features including autocomplete and Image Universal that prevent dangerous or violent content surfacing that may shock or offend our users. Our content policies for autocomplete are available externally on our [help centre](#).
- **Advertising:** In the coming months, we will block ads targeting based on the age, gender, or interests of users we know to be under 18.
- **Google Workspace for Education:** We're making it much easier for administrators to tailor experiences for their users based on age (such as restricting student activity on YouTube). And to make web browsing safer, we plan to provide K-12 institutions with SafeSearch technology enabled by default, while switching to Guest Mode and Incognito Mode for web browsing will be turned off by default.

b. Examples of online safety policies implemented by YouTube

Our approach to help children have a fulfilling and supportive experience while using our services is a holistic one that takes into account data protection imperatives, security, content safety, the encouragement of good online habits and the setting of family ground rules, as well as the fostering of children's access to knowledge, education, and the development of their autonomy.

We have put this into practice on YouTube by building products and experiences for children with high standards of privacy and safety protections, implementing robust policies to help protect children from inappropriate or harmful content, and by developing educational programmes for children, parents and educators to support children learning to explore YouTube more safely.

- **Building Products designed for children and families.** Users must be 13 years or over to create an account for themselves on our main YouTube service. YouTube employs machine learning to identify signals on YouTube channels that indicate when an account operating a channel may be owned by a user under 13. We rely on signals to find these channels, and then flag for a team to review more closely. If we suspect that an account has been created by someone under 13, we require them to verify their age with a credit card or a Government issued ID. If they cannot verify that they are above the age of 13, then they will be required to either add parental supervision or delete their account. We took action on more than 7M accounts globally during the first 3 quarters of 2021 when we learned they may belong to a user under the age of 13 - 3M of those in Q3 alone as we have ramped up our automated removal efforts.

For users under 13, we have developed products to help provide children and families with more contained, age-appropriate experiences and protections and develop the balance that works for them:

- **YouTube Kids**¹. An app that provides a separate YouTube experience designed especially for children, which parents can supervise. The app uses a mix of filters, user feedback and content moderation to help keep the videos in YouTube Kids family-friendly, allowing children to explore a catalog of content in a safer environment. YouTube Kids can be used as a standalone app or web experience, where parents can sign-in to access a broader set of controls to customise their child's experience, or through Family Link.

¹ <https://www.youtube.com/kids/>

- [YouTube Supervised Experience](#)². As of March 2021, parents using Family Link can also choose to allow their children under the age of 13 to access the main YouTube service by selecting one of three content settings. The new YouTube Supervised Experience looks much like YouTube’s flagship app and website, but with adjustments to the features children can use and ads protections. For example, on Supervised Experiences, we don’t serve personalised ads and we prohibit certain types of advertising, including ads related to weight loss and diets or ads for dating sites. YouTube supervised experiences also have disabled in-app purchases, as well as features such as uploading videos or livestreams and reading or writing comments, to help prevent risks of unwanted interaction with other users.
- **Implementing clear policies and content principles** Across our different platforms, we take [a number of steps](#)³ to help ensure the safety and security of children by connecting them with useful, trustworthy, and helpful content and prohibiting harmful content. We work with internal and external experts to develop clear policies to keep children safe, and we do not allow content that endangers or exploits minors on our platform. Our [YouTube Community Guidelines](#)⁴ set out clear categories of content that are excluded from the platform and categories of content that are subject to age restriction. These policies apply to videos, video descriptions, comments, live streams, and any other YouTube product or feature. For example,
 - **Explicit content that is meant to be sexually gratifying is [prohibited](#) on YouTube.** Our Community Guidelines cover [nudity and sexual content](#).⁵
 - **We have strict policies and robust operations in place to tackle content and behaviour that is harmful or exploitative to children.** Our [child safety policies](#)⁶ do not allow content that endangers the emotional and physical well-being of minors. This includes content that sexually exploits minors, that highlights harmful or dangerous acts involving minors, and that causes emotional distress on minors.
 - **We have [policies](#)⁷ in place that prohibit content that encourages dangerous or illegal activities that risk serious physical harm or death.** Examples of this type of content include dangerous challenges, instructions to kill or harm, content that praises or glorifies eating disorders, amongst others. We prohibit content on YouTube that is intended to shock or disgust, or poses a considerable risk to viewers.
 - **YouTube also has policies prohibiting content that promotes [suicide or self-harm](#).** We remove content promoting or glorifying suicide, content providing instructions on how to self-harm or die by suicide and content containing graphic images of self-harm posted to shock or disgust viewers. The Stanford Internet Observatory⁸ recently highlighted how we handle searches related to self-harm and suicidal ideation, writing that they were “impressed that YouTube’s Community Guidelines on suicide and self-injury provide resources, including hotlines and websites, for those having thoughts of suicide or self-harm, for 27 countries.”
 - **For content that contains topics related to suicide or self-harm which is not in violation of our Community Guidelines, we may show features like a warning on**

²https://www.youtube.com/myfamily/?gclid=CjwKCAjw6fCCBhBNEiwAem5SOxCji-s2cTSCYGQfZhFxbPpj2cd_C3615hoketnMxGUnfVFtAzaqAhoCVa8QAvD_BwE&gclidsrc=aw.ds

³https://www.youtube.com/intl/ALL_uk/howyoutubeworks/

⁴https://www.youtube.com/intl/ALL_uk/howyoutubeworks/policies/community-guidelines/

⁵<https://support.google.com/youtube/answer/2802002>

⁶<https://support.google.com/youtube/answer/2801999>

⁷<https://support.google.com/youtube/answer/2801964>

⁸<https://cyber.fsi.stanford.edu/io/self-harm-policies-report>

- the video before it starts playing** or resources like a panel with supportive suicide prevention resources. YouTube has shown [crisis resource panels](#)⁹ on sensitive search queries for many years, to connect people directly with organisations that are local, free and confidential, to help them get through a moment of critical need
- **We age-restrict content that does not violate our Community Guidelines but may still not be appropriate for viewers under 18.** Age-restricted content is not viewable by users that have declared to be under 18 years-old, users that have not been identified as likely above 18 years-old, and/or signed out users. The categories of content we consider for age-restriction include harmful or dangerous activities, nudity and sexually suggestive content, violent or graphic content, and vulgar language, videos that may contain adults participating in dangerous activities that minors could easily imitate, videos that invite sexual activity —such as provocative dancing—, or videos with heavy profanity. We provide additional details about the types of content we consider for age-restriction [here](#)¹⁰.
 - **At Google, we believe that technology can be a force for good**, unlocking creativity, fostering expression, and teaching skills that help children and young people build their futures. Our holistic approach helps children have a fun and supportive experience while using our services. This includes taking into account security, privacy, and content safety. We are committed to supporting users of all ages to develop healthy relationships with technology and use our services in ways that support their mental health and wellbeing. We work constantly to understand both the opportunities and the challenges our users face, including through research and engagement with experts. And we build on this by developing products and policies that help our users—particularly children and families—form healthier digital habits.

We have robust mechanisms to monitor compliance with our policies and to enforce our policies. We rely on a mix of human and technological intervention: we encourage all users to report content that violates our Community Guidelines; we have established the YouTube Trusted Flagger programme, by which individual users, government agencies and NGOs can notify content that violates our Community Guidelines; and we have developed machine learning classifiers to automatically and quickly identify and remove potentially violative content. Content that is found to violate our Community Guidelines is removed; in addition, enforcement may have repercussions for those who violate our policies and may result in channel or account terminations.

- **Protecting children’s privacy** - We’ve worked hard over the years to develop a comprehensive, cross-functional privacy program that helps to ensure privacy and security are incorporated into our product development process.
 - We mandate company-wide privacy and security training, and provide specialised training where appropriate, including on the handling of childrens’ data and implementing our childrens’ data privacy policies. Our internal policies and trainings guide our product teams in the design of new features to ensure that we develop products with an eye toward transparency about what data is collected and stored, and how it is used.
 - This approach helps us focus on providing appropriate settings and controls for our users of all ages, particularly children and families. The result is a suite of products and ongoing enhancements that are fundamentally designed to offer younger users a safer,

⁹ <https://support.google.com/youtube/answer/10726080?hl=en-GB>

¹⁰ <https://support.google.com/youtube/answer/2802167>

more age-appropriate online experience.

- **We've implemented privacy-preserving default settings and protections for users under 18.** For example;
 - **Ads personalisation will be disabled for users under 18.** As mentioned above, Ads personalisation is already disabled on YouTube Kids and YouTube Supervised Experiences. In the coming months, ads personalisation will be disabled for all users under 18 years of age, meaning that we won't allow ads to be targeted to under 18s based on their age, gender or interest.
 - **For content subject to different sharing settings, YouTube has set the default upload setting for users under the age of 18 to the most private available** in order to help protect the privacy of teens. With [private uploads](#)¹¹, content can only be seen by the user and whomever they choose.
 - **Educational materials for parents and children.** We have developed a number of educational resources to help children be safer and more protected online, and to assist parents in protecting and promoting the best interests of their child.
 - **Help Centre.** We maintain a comprehensive Help Centre, which provides relevant information for parents and children, including [resources](#)¹² that help them understand their choices as a family.¹³
 - **Parental guidance.** We developed materials to guide parents in the support they can provide to their children. For example, YouTube recently published the guide "[Exploring YouTube Confidently: A family guide to supervised experiences](#)"¹⁴. The guide helps parents better understand YouTube Supervised Experience and the controls they can use, and provides helpful tips on how to talk to children about the content they watch, the time they spend online and how they can use the privacy controls we offer. YouTube also publishes videos to increase parental awareness about the supervision tools we offer.
 - **Support for YouTube creators to develop better content for children.** Over the last few years, we have been working with creators and child development specialists to provide guidance on how to create high-quality kids content. Using extensive research on children's media, digital learning, and the study of good citizenship, we established a set of [quality principles](#)¹⁵ and an easy-to-understand [guide](#)¹⁶. For example, content that would comply with our high quality principles should demonstrate or encourage respect, good behaviour and healthy habits.

c. Other investments in child safety across our platforms

- Google is committed to stopping the use of our platforms to spread **child sexual abuse material (CSAM)**. We deter, detect and report offenses on Google products and have invested

¹¹<https://support.google.com/youtube/answer/157177?hl=en&co=GENIE.Platform=Desktop#zippy=%2Cprivate-video>

¹² https://support.google.com/youtube/answer/10315420?hl=en&ref_topic=10314939

¹³ For example: https://support.google.com/youtube/answer/10315420?hl=en&ref_topic=10314939

¹⁴<https://kstatic.googleusercontent.com/files/345588e42040fc645f918abdb232e1e180335809f2bbeaa14c32525251779d002124f3f81e99e38d102e8ed0c5b1fbc94e5b0ffc45fd1be1acfea775b9d665e0>

¹⁵ <https://support.google.com/youtube/answer/10774223>

¹⁶ https://services.google.com/fh/files/helpcenter/best_practices_for_kids_and_family_content.pdf

heavily in fighting against child exploitation online. This includes our Content Safety API and [CSAI Match](#) tools, and our Trust & Safety teams who work 24 hours a day to quickly respond to any child safety incident.

- **We are a leading member of the [Technology Coalition](#)**, where child safety experts across the industry build capacity and help companies working to increase their capacity to detect CSAM. In June 2020, the Tech Coalition announced a multi-million dollar Research and Innovation Fund and [Project Protect](#)—a cross-industry initiative to combat CSAM through investment, research, and information sharing.
- This work has included **developing new technology that allows Google to identify illegal CSAM** content on our own platforms and report this content to the competent authorities. Google also responds to requests from government agencies, including law enforcement, who wish to report child safety to us.
- We also established policies that move beyond the most egregious child safety violations and set standards about what is and is not appropriate for young people. **All apps on the Play Store are vetted for the core safety needs of all users.** Apps designated specifically for children must participate in the Designed for Families Program, which requires that everything uploaded respects young people’s needs and does not expose them to potentially harmful content - including sexual imagery, violence, gore, or inappropriate content.
- **Location History**¹⁷ is already turned off by default, and only available for signed-in users. We recently announced that we will disable Location History for users under the age of 18, meaning they will not be able to access that feature.
- **We prohibit autocomplete of suicide** or self harm-related search queries.

d. Promoting wellbeing for children online

We believe the bar on digital wellbeing should be even higher when it comes to children, and we have developed tools to promote wellness for children on our platforms. Recent studies have highlighted that digital media use can help teens communicate with peers and family, seek helpful resources if they are experiencing distress, and find opportunities for learning and entertainment that can help combat isolation.

We also work closely with a range of Australian experts including;

- We have invested almost \$4m in the development of the Alannah and Madeline Foundation’s eSmart Digital Licence and Media Literacy Lab. More than 300,000 Australian students have registered for the Digital Licence, an interactive online safety education program. In addition, 268 schools have enrolled in the Foundation’s Media Literacy Lab program that teaches critical thinking and media literacy skills to 13-16 year olds;
- We supported Project Rockit in developing a YouTube series of short form videos on difficult topics such as respectful relationships, bullying and sharing nudes;
- We provide an annual donation to Kids Helpline; and
- We invest in academic research to further inform policy making in this important area.

¹⁷ <https://support.google.com/accounts/answer/3118687?hl=en>

We've implemented multiple wellness programs for kids across several Google owned platforms. The parental controls available within the Family Link app¹⁸ include screen time limits, the option to approve all app downloads and the ability for a parent to lock their child's device at certain times (e.g. when they should be sleeping). Parents can also set screen time limits and control what content is available to their child on YouTube Kids. Original content like the Workout Badges on the main YouTube platform helps encourage playful movement even when kids are stuck at home.

These are opportunities that have become even more important to young people and families during COVID-19, when organisations as diverse as ministries of education to local churches have used YouTube to help families stay connected. As described earlier, we prioritise content that helps kids stay safe and healthy, and understand the world around them. For example we have featured content in YouTube Kids that help kids learn about how viruses are spread, or videos that prepare them to return to school. In addition, we have worked with creators to develop a series of public service announcements to help children reflect on the time they spend online, and build empathy for others.

e. Age assurance

Google employs a range of systems, methods and approaches to determine the age of users prior to limiting access to age-inappropriate material. These measures can be supplemented with additional steps that ensure that children interacting with services are being treated appropriately while also respecting data minimisation requirements. These were set out in our recent submission on the [Restricted Access Systems \("RAS"\) Declaration Discussion Paper](#):

- Self-declaration mechanisms, when thoughtfully designed, can provide a good solution for age verification. In our experience, in designing appropriate mechanisms to confirm the age of users, it is important to recognise that information about age can be reliably solicited if certain steps are taken to ensure the "neutrality" of the age screening: for example, organisations should provide users with choices which are not restricted to ages above the age of consent (e.g., Users should either freely enter the day / month / year of birth, or use a drop-down menu that includes ages that are both under and over the age of consent).
- A technical mechanism can also be implemented to prevent a child from back-buttoning and entering a different date of birth on the form after they have confirmed their age the first time. For users under the age of 13, we ask them to get help from a parent to create an account with Family Link.
- We are trialing age inference models in Europe that can help establish the age of the user while minimising friction. These machine learning models can help establish the age of the user with a degree of accuracy and can help tailor the protections appropriately. The data used to infer the age of the user is used by these models exclusively for the purpose of establishing if the user is likely to be over or under 18. We are evaluating the data from this trial and considering how we might expand these models globally.
- The use of hard identifiers or third-party verification methods should be restricted to content and services that are particularly risky for children as they have a detrimental impact on all users' ability to access content and services. They can also have a disproportionate impact on particularly vulnerable groups, which may have limited access to credit cards or wider forms of identification. These measures can be supplemented with additional steps that organisations

¹⁸ <https://families.google.com/familylink/>

could take to ensure that children interacting with services are being treated appropriately while also respecting data minimisation requirements.

Even though effective age verification techniques and technologies are still in the early stages of their development, we believe that by working together through avenues for multi-stakeholder dialogue like this one, we can find better ways forward to protect children online and to foster an open Internet for generations to come.

No age verification mechanism is 100% accurate, and the more accurate the mechanisms the more intrusive it likely is. Ensuring that we implement age-appropriate safeguards, while at the same time ensuring that our services remain private and accessible remains a complex challenge. It's a problem that we are committed to solving, but no one company will be able to address this alone.

Age assurance models should follow a risk-based assessment and be implemented in a proportionate way, balancing the need for accuracy with the risk of limiting rightful access to information and impact on users' privacy. Age assurance measures should complement parental tools that help put parents at the centre of deciding what is best for their children and families. And they should build on robust product design and clear policies to ensure that users, and children in particular, have a safer and more enriching experience.

3. Google's commitment to promoting the wellbeing of Australians online

Google is committed to promoting the wellbeing of our users, and we continue to develop new products and initiatives to give everyone the tools they need to establish their own sense of digital wellbeing on all our platforms.

In 2018, after conducting extensive research and investigation, we developed a Digital Wellbeing Initiative. Making healthy choices about screen time and use is important to ensure that our interaction with technology is positive. As technology becomes increasingly prevalent in our day-to-day lives it can distract us from the things that matter most. We believe technology should play a helpful, useful role in all people's lives, and we're committed to helping everyone strike a balance that feels right for them.

Our Digital Wellbeing Initiative is a set of principles-based tools and features to help people find their own sense of balance. Our initial efforts were focused on features across Android, Family Link, YouTube, and Gmail to help people better understand their tech usage, focus on what matters most, disconnect when needed, and create healthy habits for their families. These tools help people gain awareness of time online, the need to disconnect for sleep, and manage their tech habits.

We know that one size doesn't fit all and behaviour change is individual. Some people respond more readily to extrinsic motivation (like setting their app timer) and others to intrinsic motivations (based on personal goals like spending more time with family). With this ongoing and evolving approach to supporting our users' digital wellbeing, we have developed the following key products and tools for our users.

a. Wellbeing tools and products for Android

The latest versions of our mobile operating system, **Android**, added key capabilities to help users achieve their optimal balance with technology with a focus on raising awareness of tech usage and providing controls to help them interact with their devices the way they want.

- First, since we know that people are motivated when they can reflect on tangible behaviours they want to change, we have a **dashboard** that provides information in one place. This shows how much time they spend on their devices, including time spent in apps, how many times they've unlocked their phone, and how many notifications they've received.
- With **app timers**, people can set time limits on specific apps. It nudges them when they are close to their limit, and then will gray out the app icon to help remind them of their goal. We have seen that app timers help people stick to their goals 90% of the time.
- Android's **Do Not Disturb function** is one way we address the impact that notifications have on the cycle of obligation as demonstrated in user research. Do Not Disturb silences the phone calls and texts and the visual interruptions that pop up on users' screens. And to make it even easier to use, we created a new gesture. If this feature is turned on, when people turn over their phone on the table, it automatically enters Do Not Disturb mode so they can focus on being present.
- Because there is extensive research that indicates the importance of sleep on people's overall wellbeing, we developed **Wind Down**. This function gets people and their phones ready for bed by establishing a routine that includes their phone transitioning to Night Light mode to reduce blue light and Grayscale to remove color and the attendant temptation to scroll. Since introducing this function, we have seen Wind Down lead to a 27% drop in nightly usage for those who adopt it.
- Finally, at Google's 2019 I/O Developer Conference, we introduced a new setting called "**focus mode**." This works like Wind Down but can be used in other contexts. For example, students who need to focus on a research assignment can set "focus mode" to pause the apps and notifications that may be distracting.

b. Wellbeing tools and products for Search

- As was mentioned previously, in order to protect users whose queries indicate intent of self harm, Google will serve a results box at the top of the search results page with the phone number of trusted organisations that can provide help and support. For instance, for any suicide related queries, the results box prioritises Lifeline's telephone number in Australia.
- When users search for depression, we go a step further. We surface a knowledge panel with information that has been vetted by the Mayo Clinic about clinical depression and give users the option to tap "Check if you're clinically depressed", which will bring users to a clinically validated screening questionnaire to test what a user's likely level of depression may be. This test is meant to provide users with useful and insightful information to help them have more in-depth conversations with their doctors.

c. Wellbeing tools and products for YouTube

Individuals use YouTube differently. Some use it to learn new things, while others use it when they need to be entertained or to stay in touch with their favourite creators. Whatever their use case, we want to help everyone better understand their tech usage, disconnect when needed, and create healthy habits. For this reason, YouTube launched a series of updates to help users develop their own sense of digital wellbeing.

- **Autoplay turned off by default.** For users that declare to be under 18 when they create their Google Account, autoplay on YouTube has been turned off by default on all devices where this possibility exists. We have also built a new autoplay setting on YouTube Kids, which has also been turned off by default, and autoplay has always been default off in YouTube Supervised Experience. In the coming months, we will also be launching additional parental controls in the YouTube Kids app, including the ability for a parent to choose a “locked” default autoplay setting so their children cannot change this control.
- **Time watched profile:** This profile in the main account menu gives users a better understanding of how much they watch. It lets users see how long they have watched YouTube videos today, yesterday, and over the past seven days.
- **Take a Break and Bedtime reminders turned on by default.** For users of the main YouTube service that declare to be under 18 when they create their Google Account, [Take A Break](#)¹⁹ and [Bedtime](#)²⁰ reminders have been turned on by default. These steps are aimed at reinforcing healthy screen time habits.
- **Dislike Count Private:** To ensure that YouTube promotes respectful interactions between viewers and creators, we introduced several [features](#) and [policies](#) to improve their experience. As part of this effort earlier this year we also [made](#) the dislike count private across YouTube. The data we had from our experiment with this launch showed a reduction in dislike attacking behaviour, which is where people work to drive up the number of dislikes on a creator’s videos. This is just one of many steps we are taking to continue to protect creators from harassment.
- **Scheduled Digest for Notifications:** This feature allows users to combine all daily push notifications they receive from the YouTube app into a single combined notification. Users set a specific time to receive their scheduled digest and then receive only one notification per day.
- **Disable notification sounds and vibrations:** This feature ensures that notifications from the YouTube app are sent silently to users’ phones during a specified time period each day. By default, all sounds and vibrations will be disabled between 10pm and 8am, but users can enable/disable the feature and customise the start and end times from their Settings.

YouTube also helps viewers navigate their health questions and interests online and discover credible and engaging video content. For many years, YouTube has shown crisis resource panels on sensitive search queries, to connect people directly with organisations that are local, free, and confidential, to help them get through a moment of critical need. But with mental health challenges becoming a rising concern during the pandemic, we recently built out a number of updates to our crisis response panels to better connect with people. Previously, YouTube’s crisis resource panels only appeared in search results. We’re now expanding them to show on the Watch Page as well, right under the video title. The Watch Page is where people spend most of their time on YouTube, which means a significant increase in the visibility of these messages. The panels appear on the Watch Page below videos whose content is about suicide and self-harm, delivering a powerful combination of educational and emotionally resonant content alongside prompts to take action if needed. We also updated the language in our panels. The new language emphasises that services are free, confidential and available 24/7, and offers resources to call or chat a local support line.

¹⁹ <https://support.google.com/youtube/answer/9012523?hl=en&co=GENIE.Platform%3DAndroid>

²⁰ <https://support.google.com/youtube/answer/9884905?hl=en&co=GENIE.Platform%3DAndroid>

d. Other wellbeing tools across our products

Wellbeing tools are also available on a range of other Google products and services. As mentioned above, the parental controls available within the Family Link app²¹ include screen time limits, the option to approve all app downloads and the ability for a parent to lock their child's device at certain times (e.g. when they should be sleeping). Using the Google Assistant, users can now voice-activate Do Not Disturb mode — silencing all notifications and communications — and the Bedtime Routine. On Google Wifi, parents can pause connectivity on one or all of their kids' devices simultaneously, or help them wind down by scheduling a time-out. While on Google Home users can also easily schedule breaks from one or all of the devices their family uses. Gmail now has the option to allow only high priority notifications.

Beyond making tools available to help our users improve their digital wellbeing, we also have advertising policies in place to protect our users' wellbeing. We do not allow ads that threaten or advocate for physical or mental harm on oneself or others, including content advocating suicide, anorexia, or other self-harm. Similarly, the Google Play Store does not allow apps that contain or facilitate threats, harassment, self harm, suicide, or bullying, or apps that promote negative body or self-image.

We are also thinking through our role in the broader Internet ecosystem and trying to find ways to help users find the content they're looking for quickly without extensive device usage. One major change we have made in this space can be found in our efforts to reduce the use of interstitials, or advertisements shown while a page is downloading. Pages that show intrusive interstitials provide a poorer experience for users than other pages where content is immediately accessible. This can be problematic on mobile devices where screens are often smaller. To improve the mobile search experience, pages where content is not easily accessible to a user on the transition from the mobile search results may not rank as highly.

As we continue to develop new tools and products, we remain committed to treating our users' data responsibly and protecting user privacy with strict protocols and innovative privacy technologies. We believe that products should keep user information for only as long as it's useful and helpful to the user — whether that's being able to find their favourite destinations in Maps or getting recommendations for what to watch on YouTube. The first time users turn on Location History — which is off by default — their Auto-delete option will be set to 18 months by default. Web & App Activity Auto-delete will also default to 18 months for new accounts. This means that a user's Web & App Activity data will be automatically and continuously deleted after 18 months, rather than kept until they choose to delete it. Users can always turn these settings off or change their Auto-delete setting at any time.

We're also actively conducting our own research and exploring partnerships with independent researchers and experts to build a better understanding of the many personal impacts of digital technology. We believe this knowledge can help shape new solutions and ultimately incentivise the wider technology industry toward creating products that support digital wellbeing.

²¹ <https://families.google.com/familylink/>

Further information about our tools, as well as expert recommendations, is available at wellbeing.google.com.

4. Google's partnerships to promote online safety

Cooperation among online service providers can also be a helpful tool to address harmful online activity, and Google takes measures to cooperate today with other online service providers on a range of safety and security measures.

a. Global Internet Forum to Counter Terrorism (GIFCT)

We work closely with companies across the sector through the Global Internet Forum to Counter Terrorism (GIFCT). The GIFCT brings together industry, governments and civil society to foster collaboration and information-sharing to counter terrorist and violent extremist activity online. Through the GIFCT, industry has developed the Content Incident Protocol, a process by which GIFCT member companies quickly become aware of, assess, and address potential content circulating online resulting from an offline terrorist or violent extremist event. Other areas of collaboration include the hash sharing database where members can share hashes of known violent extremist and terrorist content, investment in research, and knowledge sharing with smaller platforms who typically have less resources than the larger founding members.

b. Australian Code of Practice on Disinformation and Misinformation

Google is a founding member of DIGI, which aims to bring together global, Australian, large and scale-up technology companies on issues of shared public policy interest. DIGI recently launched a new code of practice that commits a diverse set of technology companies to reducing the risk of online misinformation causing harm to Australians. Google has adopted the Australian Code of Practice on Disinformation and Misinformation, as have Adobe, Apple, Facebook, Microsoft, Redbubble, TikTok and Twitter. In doing so, each of these companies has committed to safeguards to protect Australians against harm from online disinformation and misinformation, and to adopting a range of scalable measures that reduce its spread and visibility. This includes publishing annual transparency reports about their efforts under the code, which will help improve understanding of online misinformation and disinformation in Australia over time. The first set of DIGI transparency reports were published on May 22, 2021 and are available to read [here](#).

c. Global Alliance for Responsible Media (GARM)

Through the Global Alliance for Responsible Media (GARM), a cross-industry initiative established by the World Federation of Advertisers, we work to address the challenge of harmful content on digital media platforms and its monetisation via advertising. GARM's role is to act as the forum for the creation of solutions that will improve online safety for both consumers and advertisers. By creating a working forum where all parts of the online advertising system can meet, GARM's ambition is to get the digital media ecosystem working together on the shared priorities that will lead to the removal of harmful content from advertiser-supported social media. GARM works by addressing specific issues and challenges in working groups, formed by member organisations with an individual and organisational interest in the given focus area. Each working group develops an appropriate solution to its challenge,

and these are then proposed to and voted on by the broader GARM community. Once accepted, they are taken up by the wider industry to help in the fight against harmful content.

d. Digital Trust & Safety Partnership (DTSP)

We are a member of the Digital Trust & Safety Partnership (DTSP), a first-of-its-kind partnership with other leading technology companies committed to developing industry best practices, verified through internal and independent third-party assessments, to ensure consumer trust and safety when using digital services. As discussions on these important issues continue, the group will engage with consumer and user advocates, policymakers, law enforcement, relevant NGOs and various industry-wide experts to help us develop these best practices. The Partnership will share a state-of-the-industry report that evaluates companies' implementation of the practices.

5. Algorithms

As we mentioned at the outset, at Google, our mission is to organise the world's information and make it universally accessible and useful. We continuously map the web and other sources to connect users to the most relevant, helpful information.

With the vast amount of information available, finding what our users need would be nearly impossible without some help sorting through it. Google's ranking systems are designed to do just that: sort through hundreds of billions of web pages and other content in our Search index to present the most relevant, useful results in a fraction of a second.

To give users the most useful information, Search algorithms look at many factors and signals, including the words of their queries, relevance and usability of pages, expertise of sources, the user's context, such as their location and language, and settings. The weight applied to each factor varies depending on the nature of their queries. For example, the freshness of the content plays a bigger role in answering queries about current news topics than it does about dictionary definitions. More information about the Search ranking algorithms can be found at https://www.google.com/intl/en_au/search/howsearchworks/how-search-works/ranking-results/.

Across our different platforms, we strive to connect people with "high-quality information" — the most useful, trustworthy, and helpful content — at the moment a person needs it. At the same time, we work to prevent user and societal harm and limit the reach of "low-quality information" - content that strays furthest from those qualities.

For example, YouTube's algorithms take into account many signals, including a user's watch and search history (if enabled) and a user's context, such as country and time of day. Where applicable, these signals are overruled by the signals relating our efforts to reduce recommendations of harmful misinformation as well as borderline content, which is content that comes close to, but doesn't quite violate our Community Guidelines. Our goal is to limit views of this type of lower quality content by not actively recommending it, and by ranking high quality, authoritative sources above this type of content in search results. To determine what is borderline, we work with human evaluators and experts who use

public guidelines and provide input on video quality. You can read more about how YouTube's recommendation system works [here](#).

We continue to invest heavily in the systems, policies and products needed to protect users from harmful content, and have seen significant progress. In general we think about this in four pillars: removing violative content, raising up authoritative content, reducing the spread of borderline content, and rewarding trusted creators.

Researchers at the University of Berkeley have found that YouTube's recommendation algorithm actively discourages viewers from visiting radicalising or extremist content by favoring mainstream media and cable news content over independent YouTube channels ([Ledwich, 2020](#)). And another set of researchers at Berkeley ([Faddoul, 2020](#)) went further by confirming that YouTube's policies have led to a reduction in conspiratorial recommendations.

6. **Google's commitment to transparency and accountability**

Google has a long tradition of industry-leading transparency initiatives. We believe that transparency reports can give the public and an oversight body a clear picture of what platforms are doing to tackle harms, and inform a regulator's judgments about systemic failures. They will also encourage companies to improve the measures taken to keep their users safe, long before fines or more significant sanctions are required. We have [shared](#) our ideas for approaching oversight of content-sharing platforms in a number of fora.²² To summarise, we believe that effective regulation should provide legal clarity for platforms; focus on systemic approaches to the relevant issues; and rely on transparency and best practices.

The benefits of transparency must be balanced against the potential risks that detailed transparency can allow bad actors to game a platform's systems through manipulation, spam, fraud and other forms of abuse. Transparency requirements must also be careful not to risk trade secrets or violate user privacy or data disclosure laws. Special regard should be paid to ensuring the appropriate balance with other legal obligations and rights such as freedom of expression.

In our submission to the Parliamentary Inquiry into the Criminal Code Amendment (Sharing of Abhorrent Violent Material) Act 2019, we put forward four key principles that inform our practises and suggested that these provide a strong foundation for effective regulatory frameworks:

- **Shared Responsibility:** Tackling illegal content is a societal challenge—in which companies, governments, civil society, and users all have a role to play. It is essential to provide clear notice about the specific piece of content to an online platform, and then platforms have a responsibility to take appropriate action on the specific content. In some cases, content may not be clearly illegal, either because the facts are uncertain or because the legal outcome depends on a difficult balancing act; in turn, courts have an essential role to play in fact-finding and reaching legal conclusions on which platforms can rely.
- **Rule of law and creating legal clarity:** It's important to clearly define what platforms can do to fulfil their legal responsibilities, including removal obligations. An online platform that takes other

²² <https://www.blog.google/outreach-initiatives/public-policy/oversight-frameworks-content-sharing-platforms/>

voluntary steps to address illegal content will be reassured that these measures cannot have the negative consequences of being unprotected from legal liability. (This is sometimes called the “Good Samaritan” principle, and is reflected in leading legislative proposals such as the EU Commission’s draft Digital Services Act regulation, which includes protections for “voluntary own-initiative investigations”).

- **Flexibility to accommodate new technology:** While laws should accommodate relevant differences between platforms, given the fast-evolving nature of the sector, laws should be written in ways that address the underlying issue rather than focusing on existing technologies or mandating specific technological fixes.
- **Fairness and transparency:** Laws should support companies’ ability to publish transparency reports about content restrictions, and provide people with notice and an ability to appeal restrictions. They should also recognise that fairness is a flexible and context-dependent notion—for example, improperly blocking newsworthy content or political expression could cause more harm than mistakenly blocking other types of content.

Google launched our first Transparency Report in 2010. By publishing information about government requests for our users’ data, we hoped to shine a light on government attempts to access user information by creating transparency around the volume of these requests and, importantly, how we work every day to safeguard users’ information. At the time, Google was the first company to publish a report like this. We set a bar for other companies across the technology industry who followed suit and began to provide their own reports.

Since that initial report, Google has continued to expand transparency reporting with a goal of shedding light on how the policies and actions of governments and corporations affect privacy, security, and access to information. YouTube data is included in several reports available on the Google Transparency Report website, including government requests for user data and content removals; our efforts to combat child sexual abuse material; and major traffic disruptions to our products and services due to government interference.

In keeping with this strong tradition of transparency, in 2017, YouTube launched a Community Guidelines Enforcement Report to create accountability around our efforts to remove harmful content from our platform. The report offers data on global video, channel, and comment removals for violating our policies; appeals and reinstatements; and human and machine flagging. We recognise it is absolutely critical to enforce the policies that we establish for our users, and we enforce our policies at scale through a combination of people and cutting-edge machine learning. For example, we use hashes (or “digital fingerprints”) to automatically identify copies of known violative content before they are ever made available for viewing. These systems automatically remove content only where there is high confidence of a policy violation and flag the rest for human review. We also have thousands of people around the world who review abusive content on our platforms. Between April and June 2021, YouTube removed over 6.3 million videos for violating our Community Guidelines. 94% of these videos were first flagged by machines rather than humans. Of those detected by machines, nearly 38% never received a single view, and over 36% received between 1 and 10 views.

Our transparency reports also include deep dives on key content policy areas including child safety, violent extremism, and hate speech. Our report has grown since we first launched it as we, too, continue to provide more transparency to users about the ways our policies and enforcement impact access to

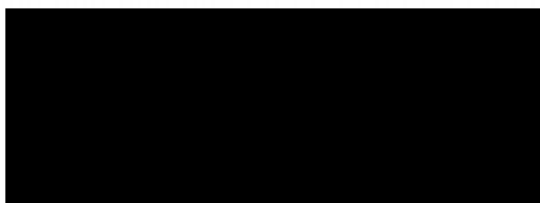
information. For example, last year we added a new data point to our report called Violative View Rate (VVR), which is an estimate of the proportion of video views that violate our Community Guidelines in a given quarter (excluding spam). VVR is our North Star for measuring our progress in combating harmful content on the platform and we believe sharing it with the public is an important way to create accountability. In Q3 2021, Violative View Rate was 0.09-0.11%, meaning that out of every 10K views on YouTube, only 9-11 come from violative content. In 2020, Google commenced publishing a report documenting how we are combating child sex abuse material²³.

Beyond our commitment to transparency about our policies and enforcement practices, we also believe that data transparency is important and helps our users make informed decisions about what data to save, share or delete in their Google Account. For example, with the Google Dashboard, users can see an overview of the Google products that they use and see what data is stored there, like emails and photos. And with My Activity, it's easy to see or delete data collected from activity across Google services, including things that a user has searched for, viewed and watched. Every user should also have access to content that they've shared with us – at any time and for any reason. That's why we created 'Download your data' – so that a user can download data, like their photos, emails, contacts and bookmarks. It's a user's choice to make a copy of that data, back it up or even move it to another service.

CONCLUSION

Thank you to the Committee for your consideration of this submission. Google takes the safety of our users very seriously, and we are committed to ensuring that illegal and harmful content that appears on our platforms is dealt with as quickly as possible. We know that sustainability of our business lies in creating and maintaining products that are helpful, and we are committed to working with the Parliament and all parties to promote the well-being of Australians online.

Yours sincerely,



Samantha Yorke

Government Affairs and Public Policy

Google Australia

²³ <https://transparencyreport.google.com/child-sexual-abuse-material/reporting?hl=en>