External Responses

Question	Your response
Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.	*Is this response confidential? – N* **Airbnb's service** Airbnb is a global online marketplace that brings together Hosts (who have accommodation or experiences they want to advertise) with guests (who want to rent accommodation or book experiences). **Airbnb's interest in Online Safety** We believe in working collaboratively with our community, governments and regulators. We support Ofcom's commitment to ensuring the internet is open, vibrant and safe - in a regulatory environment that keeps pace with innovation and the changing shape of the internet - and we welcome an updated regulatory framework. We are very invested in ensuring that the Airbnb platform is safe for all our users. **Airbnb's users, revenues and business model** Airbnb generates income by charging service fees to Hosts and guests. Airbnb has roughly 6 million active listings, globally. In Q2 2022, the Airbnb group generated $2.1 billion in revenue globally, with a net income of $379 million. While unregistered "users" can view content on the platform, they can't access the core functionalities of the service, like booking a listing or messaging Hosts which would only be accessible after registering on the platform and logging in. There are no third party advertisements on Airbnb.
Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services? **IMPORTANT: Under this question, we are not seeking links to or copies/screenshots of content that is illegal to hold, such as child sexual abuse. Deliberately viewing such images may be a criminal offence and will be reported to the police.**	*Is this response confidential? – Y*

Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?	Is this response confidential? – <mark>Y</mark>
Question 4: What are your governance, accountability and decision-making structures for user and platform safety?	*Is this response confidential? – <mark>Y</mark>*
Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?	*Is this response confidential? – N* Airbnb has a comprehensive set of policies that are readily available to users in an accessible form. Our Terms of Service incorporate by reference a wide range of other terms and policies. When a user accepts our Terms of Service, they accept the referenced terms and policies, including, for example, on "restricted content", which expressly covers - but is not limited to - illegal content. To improve the accessibility of such policies, we also make available clearly written articles that avoid using legal jargon. These are easily found through keyword searches in the Help Centre. We think that the use of accessible policies which are drafted for a general audience, are an effective way of improving user understanding of our terms and policies.

Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?	*Is this response confidential? – N* **How do Terms of Service or public policy statements treat illegal content?** As discussed at question 5, a wide range of terms and policies are incorporated by reference into our Terms of Service, including our restricted content policy Section 13 of our Terms of Service refers to the actions that Airbnb may take if users violate laws, regulations or third party rights. This includes: • *suspend or limit your access to or use of the Airbnb Platform and/or your account;* • *suspend or remove Listings, Reviews, or other Content;* • *cancel pending or confirmed bookings; or* • *suspend or revoke any special status associated with your account.* For more material violations, we take action including suspension and removal of listings, blocking users from the platform and/or liaising with law enforcement agencies inline with this [help article](). **How are the Terms of Service maintained?** The Terms of Service are maintained by the Legal Team, in conjunction with external and subject matter experts. They are updated annually, and adjustments are made in response to both legal and regulatory changes (such as privacy and consumer protection developments) and product changes. Each time the Terms of Service are updated users are required to agree to the updated Terms. To improve accessibility and user engagement, we also upload and circulate a page that summarises, in an easily understandable way, the updates that have been included.
Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?	*Is this response confidential? – N* Airbnb has comprehensive policies (as explained in response to question 3 and 5), reporting and complaints systems (discussed in detail at questions 4 and 8) that are readily available to users in an easy to understand format on our site, which we believe to be an effective approach that can be adopted by other online service providers.
Question 8: If your service has *reporting or flagging* mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?	*Is this response confidential? – N* Airbnb provides clear "buttons" for reporting inappropriate content (including but - not limited to illegal content) that violates our restricted content policy), and clear guidelines as to what constitutes content that can be reported. It is very important to Airbnb that users are able to quickly and easily report content that violates our policies. Users can report content such as listings, messages and user profiles as soon as they encounter it. There is a clear button on each of the relevant pages that can be used to report problematic content. Every listing, profile and message can be flagged individually. The Help Centre is easy to navigate and search through, and provides clear information on how to report content that violates our policies. The response taken to flagged content depends on the type of content and the relevant policy that is engaged. Some Airbnb policies give users "strikes" before they are removed, while breaches of others result in immediate removal.

	Registered users can submit reports of illegal or harmful content using the reporting mechanisms on the site. Third parties who are not registered users can submit reports to our customer service team.
Question 9: If your service has a *complaints* mechanism in place, how are these processes designed and maintained?	*Is this response confidential?* – <mark>Y</mark>
Question 10: What action does your service take in response to *reports* or *complaints*?	*Is this response confidential?* – <mark>Y</mark>
Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?	*Is this response confidential*? – N Despite the very low risk of users encountering illegal content on the platform, Airbnb is continuously investing in developments that are aimed at keeping users safe on our platform. While this investment is partly focused on ensuring that we use the most effective automated technology available, there are risks in mandating platforms to use automated technology to identify and remove illegal content when a significant number of illegal content offences require intention on the part of the user (and therefore an assessment of that intention in order to determine whether or not the content is illegal), which cannot be determined solely on its face.
Question 12: What automated moderation systems do you have in place around illegal content?	*Is this response confidential?* – <mark>Y</mark>

	The automated systems we use are also much more accurate at identifying content that needs to be removed under our policies
Question 13: How do you use human moderators to identify and assess illegal content?	*Is this response confidential?* – <mark>Y</mark>
Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?	*Is this response confidential?* – N N/A
Question 15: In what instances is illegal content removed from your service?	*Is this response confidential?* – N Where we become aware of content that breaches our policies, we may remove it from our platform. In the case of content that falls foul of our restricted content policy, we remove it, and suspend or remove the user's account where appropriate.
Question 16: Do you use other tools to reduce the visibility and impact of illegal content?	*Is this response confidential?* – <mark>Y</mark>
Question 17: What other sanctions or disincentives do you employ against users who post illegal content?	*Is this response confidential?* – <mark>Y</mark>

	Content moderators receive training and are also subject to regular quality checks.
Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?	*Is this response confidential? – N* N/A.
Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm from illegal content?	*Is this response confidential? – N* The use of tools such as automated technology, ID verification, and location verification is discussed in the responses to questions 12 and 24.
Question 20: How do you support the safety and wellbeing of your users as regards illegal content?	*Is this response confidential? – N* As well as having robust systems in place to allow content that violates our policies to be identified and removed before it reaches users, last year, we launched the UK Trust and Safety Alliance, a network of expert organisations, including Get Safe Online (GSO), whom we work with to produce guides for UK Hosts and guests on how to spot and avoid online scams. The campaign reflects Airbnb's efforts to be a responsible industry leader committed to helping consumers stay safe online and refresh our educational messaging for users. The campaign also goes hand in hand with our UK Healthy Tourism Commitment which aims, among other things, to strengthen Host and neighbourhood defences against unwanted behaviour and bad actors online.
Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?	*Is this response confidential? – Y*
Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?	*Is this response confidential? – N* Please see the answer to question 24 for details on the age verification technologies that Airbnb uses.

Question 23: Can you identify factors which might indicate that a service is likely to attract child users?	*Is this response confidential?* – <mark>Y</mark>
Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?	*Is this response confidential?* <mark>– Y</mark>
Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?	*Is this response confidential?* – N As explained more fully in the response to question 24, it is possible for children to access the Airbnb *websi*te and search available listings, however only over 18s are able to book listings.
Question 26: What information do you have about the age of your users?	*Is this response confidential?* – N We describe in the response to question 24 the information that we hold to check a user's age. We never share images of users' ID with anyone else who uses Airbnb and we also do not share users' addresses, or the photos they take of themselves as part of ID verification. The storage of a user's government ID photo is governed by our [Privacy Policy](#), which clearly describes the steps we take to protect user information. These include taking measures to continuously implement and update administrative, technical and physical security measures to help protect user information against unauthorised access, loss, destruction or alteration.
Question 27: For purposes of transparency, what type of information is	*Is this response confidential?* – N N/A

useful/not useful? Why?	
Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?	*Is this response confidential? – N* N/A

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