

Your response

Please refer to the sub-questions or prompts in the [annex](#) to our call for evidence.

| Question | Your response |
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| Question 1: Please provide a description introducing your organisation, service or interest in Online Safety. | <p><i>Is this response confidential? – N</i></p> <p>Glassdoor, Inc. (“Glassdoor”) is an online platform that enables employees to anonymously share information describing what it is <i>really</i> like to work at a company - according to their personal experience.</p> <p>Founded in 2007, Glassdoor is the worldwide leader on insights about jobs and companies. Our mission is to help job seekers find jobs and companies they love. We do this by increasing workplace transparency. Powered by the 117 million reviews, insights and company ratings posted on Glassdoor, we offer unique insight into the employee experience at over 2.3 million companies. Alongside the latest job offerings, our reviews provide an authentic and candid look at what the workplace conditions, salaries, and culture of a company are really like from those who know the company the best - the employees.</p> <p>Globally, some 62 million unique users visit Glassdoor monthly. More than half of the traffic comes from outside the US, with the UK platform receiving approximately 7.2 million monthly visits. Fifty-seven percent of Glassdoor’s UK users are actively searching for jobs. The top reasons for users visiting our site are to gain details on salary/compensation package, information on what makes a company a great place to work, insight on benefits, and details on company mission, vision and values. The UK platform hosts over 1.2 million open jobs; in 2021, more than 420,000 workplace reviews were submitted by UK-based employees.</p> <p>At Glassdoor, the safety of our users is of paramount importance. To this end, we take immense pride in our content moderation model, which we see as playing a crucial role in protecting our users. As Ofcom continues its work on the Online Safety Bill, Glassdoor welcomes this opportunity to further engage and expand on our approach to online safety.</p> |
| 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.

Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented

Is this response confidential? – N

Glassdoor is fundamentally a platform for sharing information on workplace experiences in a way that helps the entire community, including current employees, job seekers and companies themselves. Our research shows that 54% of Glassdoor users in the UK use the platform to search and apply for jobs. We reject reviews that do not relate to an employer, a workplace experience, or are otherwise not relevant to understanding workplace experiences or culture.

Our [Terms of Use](#) and [Community Guidelines](#) are very clear on what activity and content is acceptable and unacceptable on the Glassdoor platform. For example, we specifically prohibit reviews featuring profanities, threats of violence, discriminatory language targeted at an individual or group, endorsement of illegal activities, anything pornographic or sexually explicit in

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| <p>by your service?</p> | <p>nature and the naming or identifying of individuals (outside of C-Suite level executives).</p> <p>Our Terms of Use and Community Guidelines are backed by a comprehensive multi-tier review and content moderation process. As part of this process, all English and non-English language content is first analysed using proprietary technology that assesses multiple attributes of the content. If content fails to pass this technological review, a team of human moderators is then engaged to determine if the content is consistent with the Community Guidelines. In addition, once published, content deemed objectionable by a visitor to our site can be flagged, which will prompt further review. As a result, we see the risk of harm to individuals from illegal content on our content to be relatively low.</p> <p>Glassdoor's users rely on anonymity to post frank and informative reviews. And while we acknowledge that online anonymity can be considered a risk factor for illegal content on certain platforms, online anonymity on Glassdoor is about protecting our users.</p> <p>While many companies treat their employees well and compensate them fairly, the sad reality is that some do not. The workplace is not always a level playing field. Thus the ability to post reviews anonymously enables Glassdoor users to speak about sensitive or difficult workplace experiences if they choose without the threat of undue repercussions from potentially vengeful employers. A loss of anonymity could place users' livelihoods and reputations at risk. A 2022 Glassdoor study found that 78% of UK workers believe there is value in anonymous employee reviews of workplaces (only 4% said there is no value in anonymous employee reviews). Furthermore, 77% of those surveyed said they would be more likely to share an anonymous review of their workplace if they could do so anonymously.</p> |
| <p>Question 4: What are your governance, accountability and decision-making structures for user and platform safety?</p> | <p><i>Is this response confidential? – N</i></p> <p>Glassdoor takes a coordinated, senior-led approach to user and platform safety across all business functions. Clear structures and processes for online safety underpin this and are carried from the top down.</p> <p>The seriousness we take on this matter is demonstrated by our approach to reviews or content featuring threats of self-harm on the Glassdoor platform. These cases are treated with the utmost severity and urgency, engaging input and resources from across the business to ensure that our users are kept protected and safe. When there is a threat of self-harm on the Glassdoor platform, we provide support and assistance referrals localised by country. We reach out to the user in question with suicide prevention and mental health material, and law enforcement is contacted to follow up if and as appropriate.</p> |
| <p>Question 5: What can providers of online services do to enhance the clarity and</p> | |

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| <p>accessibility of terms of service and public policy statements?</p> | |
| <p>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?</p> | <p><i>Is this response confidential? – N</i></p> <p>The safety of our users and the integrity of our platform are top priorities for Glassdoor. As noted in our answer to Question 3, this commitment to safety is reflected in our policies, Community Guidelines, and Terms of Use which govern the use of our platform. These policies make explicit what activity is acceptable and unacceptable on the Glassdoor platform, and cover both illegal and harmful activity.</p> <p>Our Terms of Use and Community Guidelines specifically prohibit reviews featuring profanity, threats of violence, discriminatory language targeted at an individual or group, endorsement or promotion of illegal activities, anything pornographic or sexually explicit in nature and engagement in the exploitation of persons in a sexual or violent manner. Further, we do not allow individuals outside C-Suite level executives to be named or otherwise identified. To not unfairly amplify any single person’s voice, we do not allow users to leave more than one review per year per company. Our moderation policies also take into account applicable law in the different international markets in which Glassdoor operates.</p> <p>We review our Terms of Use and Community Guidelines periodically and as necessary. We also take into consideration specific issues as they arise and update our moderation processes to reflect these changes.</p> |
| <p>Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users’ awareness of their</p> | |

reporting and complaints mechanisms?

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

In addition to Glassdoor’s internal processes addressing illegal content, Glassdoor has reporting and flagging mechanisms in place so that users can alert us to any content that may be inconsistent with or in violation of our [Terms of Use](#) and [Community Guidelines](#). Users can report content in two ways: by clicking the ‘flag’ icon located below the relevant content or through the ‘Employer Centre’. Glassdoor has a dedicated [page](#) in our ‘Help Centre’ explaining how users can report inappropriate content or flag a review.

5.0 ★★★★★
Former Employee
review
15 Feb 2022 - Desk Job
 Recommend CEO Approval Business Outlook
Pros
pros great, communication good hours fun, inspirational
Cons
cons vacations, food location, travel trains and buses
[Continue reading](#)
1 person found this review helpful
😊 Helpful 📄 Share 🚩 Report

Figure 1: Screenshot of a review on the Glassdoor website showing the “Report” mechanism.

When reporting content, users must select a reason from a drop-down menu or provide an explanation (limited to 1,500 characters or less) setting forth why a review is being reported. Glassdoor’s Community Care Team will then evaluate the flagged content. This process means that the content is reviewed by a team of human moderators, which is engaged to determine if the content is consistent with our Terms of Use and Community Guidelines. Once a member of the team receives a report, they will review the content and determine the appropriate course of action - either remove the content or keep it on the Glassdoor platform. In either case, the person who flagged the review will receive an automated email notifying them of our decision. If we decide the content violates our Guidelines and we remove it from the site, the author of the content will also be notified. They will receive an automated email notifying them that their content violates our Community Guidelines and has been removed. The author will also be given instructions on how to edit their content if they would like to try and re-submit. The Community Care Team aims to reply to the user in three business days with a decision on whether or not we have

chosen to remove the flagged content from our site, although more complex matters or determinations may of course require additional time.

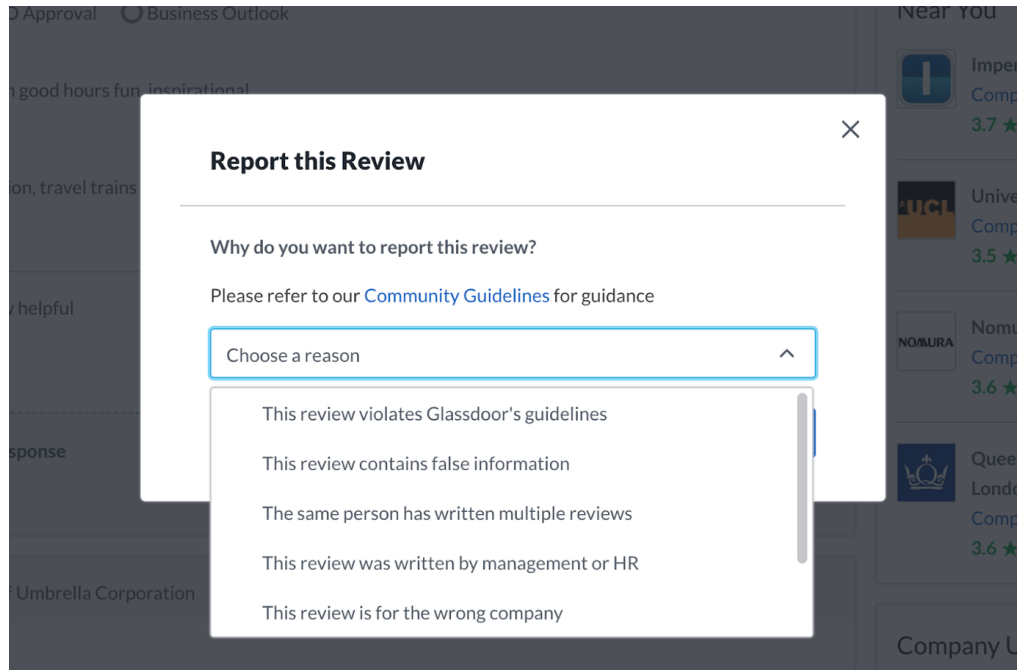


Figure 2: Screenshot of the drop-down menu a user sees when reporting a review on the Glassdoor website.

Question 9: If your service has a complaints mechanism in place, how are these processes designed and maintained?

Is this response confidential? – N

Please refer to our answer to Question 8.

Additionally, if a Glassdoor user disputes a content moderation decision taken by Glassdoor, for example a review having been removed, the dispute is escalated to a member of the Glassdoor Community Care team with the relevant expertise.

Content moderation decisions are often taken at a senior level if this is seen as appropriate and necessary to Glassdoor's commitment to increasing workplace transparency and helping job seekers. For example, employers do not always like what current or former employees say about them in a review on Glassdoor and in rare instances, employers threaten us and our users. In even more isolated instances, they file lawsuits against us and/or our user(s), demanding that we divulge user account information.

In these cases, Glassdoor is committed to protecting our users and fighting for their right to anonymous free speech as appropriate. And, where necessary and appropriate, we fight vigorously in courts worldwide to prevent the disclosure of user information. To this end, we have engaged in legal action to protect their anonymity in more than [100 cases](#).

Question 10: What action does your service take in

Is this response confidential? – N

As noted in our answer to Question 8, any content flagged by a user or employer as objectionable on Glassdoor is assessed by a team of human moderators, the 'Community Care Team', who evaluate whether the content is in compliance with our Terms of Use and Community Guidelines. Generally, if a

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| <p>response to reports or complaints?</p> | <p>piece of content meets Glassdoor Community Guidelines, it is posted on the Glassdoor site. If it does not, it is rejected and does not appear.</p> <p>Once a member of our Community Care Team is notified that a piece of content has been flagged, they will review the content and determine the appropriate course of action - to remove the content or keep it on the site. In either case, the person who flagged the review will receive an automated email notifying them of our decision. If we decide the content violates our Guidelines and we remove it from the site, the author of the content will also be notified. They will receive an automated email notifying them that their content violates our Community Guidelines and has been removed. The author will also be given instructions on how to edit their content if they would like to try and re-submit.</p> <p>Glassdoor's Community Care Team aims to reply to the user who flagged the content in three business days with a decision on whether or not we have chosen to remove the flagged content from our site.</p> |
| <p>Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?</p> | |
| <p>Question 12: What automated moderation systems do you have in place around illegal content?</p> | <p><i>Is this response confidential? – N</i></p> <p>Glassdoor strives to be the most trusted and transparent place for today's candidates to search for jobs and research companies. To ensure that content strictly adheres to our Terms of Use and Community Guidelines, posts on the Glassdoor platform are subject to a multi-tier review and moderation process. As part of this process, all English and non-English language content is first analysed using proprietary automated technology. This unique technology employs filters and algorithms to assist with finding both illegal content and content that is unacceptable under our Terms of Use and Community Guidelines. Multiple attributes of a review are assessed.</p> <p>Glassdoor's automated moderation systems are supported by several teams across the company. Our data science and machine learning teams work together with a Glassdoor project manager to train our models.</p> <p>If content fails to pass the first stage of technological review, a team of human moderators is engaged to determine if the content is consistent with the</p> |

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| | <p>Community Guidelines. Simply put, no content appears on Glassdoor without going through a thorough moderation process.</p> |
| <p>Question 13: How do you use human moderators to identify and assess illegal content?</p> | <p><i>Is this response confidential? – N</i></p> <p>As outlined above, if content fails to pass technological/automated review, a team of human moderators is engaged to determine if the content is consistent with our Terms of Use and Community Guidelines. In addition, any content flagged as objectionable on Glassdoor by a user or employer is then assessed anew by human moderators.</p> |
| <p>Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?</p> | <p><i>Is this response confidential? – N</i></p> <p>While we have no obligation to do so, Glassdoor reserves the right to investigate and take appropriate action in our sole discretion against a user who violates our Terms of Use. Appropriate action includes (without limitation):</p> <ul style="list-style-type: none"> • Removing content (or portions thereof) from Glassdoor; • Suspending rights to use Glassdoor; • Terminating a user’s membership and account; • Reporting a user to law enforcement, regulatory authorities, or administrative authorities; and • Taking legal action against the user in question. |
| <p>Question 15: In what instances is illegal content removed from your service?</p> | <p><i>Is this response confidential? – N</i></p> <p>As described in our answer to Question 3, Glassdoor’s Terms of Use and Community Guidelines are extremely clear on what activity is acceptable and unacceptable on the Glassdoor platform, specifically prohibiting reviews featuring profanities, threats of violence, discriminatory language targeted at an individual or group, endorsement of illegal activities and anything pornographic or sexually explicit in nature.</p> <p>Any post on Glassdoor undergoes a multi-tier review and moderation process to ensure that it adheres to our Terms of Use and Community Guidelines. In other words, Glassdoor moderates all content before publishing it on our site. Additionally, users and employers can flag and report any content they believe violates our Terms of Use and Community Guidelines.</p> <p>According to these processes, all instances of content that violates our Terms of Use and Community Guidelines, including illegal content, either should not</p> |

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| | appear on the Glassdoor platform or should be removed. In cases of removal, content may remain on the Glassdoor platform up to 24 hours after review due to website caching. |
| Question 16: Do you use other tools to reduce the visibility and impact of illegal content? | |
| Question 17: What other sanctions or disincentives do you employ against users who post illegal content? | <p><i>Is this response confidential? – N</i></p> <p>Please refer to Question 14.</p> |
| Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more | |

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| <p>widely by industry?</p> | |
| <p>Question 19: To what extent does your service encompasses functionalities or features designed to mitigate the risk or impact of harm from illegal content?</p> | <p><i>Is this response confidential? – N</i></p> <p>At Glassdoor, we follow policies to ensure that content on our platform is authentic and adheres to our Terms of Use and Community Guidelines.</p> <p>First, only users who have a validated account on Glassdoor can submit a review. A validated account is one created by a person of at least 16 years of age, or if older, the age of majority in the relevant jurisdiction. Additionally, we require all users to provide a valid email address to create a Glassdoor account. We verify email addresses by requiring users to activate their account through the email address provided.</p> <p>Secondly, when validating content on Glassdoor, we use unique technology filters and algorithms that we have put in place to assist with finding any possible fraudulent content or content that does not adhere to our Terms of Use and Community Guidelines.</p> <p>Regarding fraudulent content, we have specific signals that trigger us to investigate whether a review is fraudulent. These include:</p> <ul style="list-style-type: none"> • Multiple accounts created to leave multiple reviews for the same company; • Users leaving reviews on behalf of others; and • Users asking others to write a review on their behalf. <p>To prevent any of the above from taking place, it is Glassdoor policy that each member is only able to post one review, per company, per year. If it is found that a user or an employer is breaking any of the policies listed above, all contributions from their account will be removed.</p> |
| <p>Question 20: How do you support the safety and wellbeing of your users as regards illegal content?</p> | <p><i>Is this response confidential? – N</i></p> <p>The safety and wellbeing of our users are a top priority for Glassdoor. At a fundamental level, we keep our users safe by enforcing our Terms of Use and Community Guidelines to the utmost degree. This safety is achieved through a comprehensive and multi-tiered approach to content moderation involving automated processes and a dedicated team of human moderators.</p> <p>Our commitment to supporting user safety is also demonstrated by our approach to threats of self-harm on the Glassdoor platform. These cases are treated with the utmost severity and urgency, and input and resources from across the business are engaged to ensure that our users are protected and safe. When there is a threat of self-harm on the Glassdoor platform, we provide support and assistance referrals localised by country. We reach out to the user in question with suicide prevention and mental health material, and law enforcement is contacted to follow up if and as appropriate.</p> |
| <p>Question 21: How do you mitigate any risks posed by the design</p> | |

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| <p>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?</p> | |
| <p>Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?</p> | |
| <p>Question 23: Can you identify factors which might</p> | |

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| indicate that a service is likely to attract child users? | |
| Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users? | |
| Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this? | |
| Question 26: What information do you have about the age of your users? | |

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| <p>Question 27: For purposes of transparency, what type of information is useful/not useful? Why?</p> | |
| <p>Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?</p> | |

Please complete this form in full and return to OS-CFE@ofcom.org.uk