

Written Evidence from Bumble

Bumble Inc. is a leading provider of online dating services around the world. Bumble Inc. is the parent company of Bumble, Badoo, Fruitz, and Bumble For Friends. The Bumble platform enables people to build healthy and equitable relationships, through Kind Connections. Founded by CEO Whitney Wolfe Herd in 2014, Bumble was one of the first dating apps built with women at the centre and connects people across dating (Bumble Date), friendship (Bumble For Friends) and professional networking (Bumble Bizz). Badoo, which was founded in 2006, is one of the pioneers of web and mobile dating products. Fruitz, founded in 2017, encourages open and honest communication of dating intentions through playful fruit metaphors.

We currently offer our dating products in the United Kingdom where some of our main brands are widely used. Bumble Inc. is mainly a subscription model. Our revenues come from subscriptions paid by users. The majority of our platforms are mainly closed networks for private, peer-to-peer communications between adults, enabling them to establish kind connections in real life. Given the nature of our products, we serve a limited audience, which reduces the spread of potential harms.

We encourage Ofcom in its research to conduct a comprehensive review of the diversity of technology platforms to ensure that its advice to the Government on categorisation captures the variety of functionality, features, accessibility and business models of different platforms and is not limited to user count and service reach alone. For example, our platforms are all 18+ adult only apps. We have taken a number of steps to prevent children accessing our platforms. As a result, we have moderation policies and processes to ensure that our products are enjoyed by adults. By preventing underage access to our platforms, we can prevent any potential instances of online harm to children.

Bumble Inc. services are also not available to logged out users in the United Kingdom. This means you must have registered an account to access any of our apps. As a result, the likelihood of a person under the age of 18, or an adult accessing potential illegal content, or harmful content is significantly reduced and any potential harmful content is not disseminated to the public. Bumble Inc. also has clear reporting mechanisms that users can access to flag any content that may violate our community guidelines. It is very important to Bumble Inc. that users are able to quickly and easily report content that violates our policies.

Safety Practices

We anchor our vision for Kind Connections in thoughtful safety strategies, policies, features, and programs, relying on the expertise of multi-disciplinary, cross-functional teams to implement it. We work to provide supportive platforms where violence, harassment, and hate speech are not tolerated. Our members trust us to deliver on this promise, with Bumble Inc.'s products outperforming peers on perception of commitment to safety. For example, our Physical and Sexual Violence policy provides an industry-leading definition of sexual assault, which we define as any "*unwanted physical contact or attempted physical contact that is sexual in nature.*" The full policies are now available [online](#). [We restrict or ban users](#) who don't follow [Bumble's Community Guidelines](#). Violations of these Guidelines include using Bumble for solicitation, using someone else's photos, pretending to be someone who you're

not, and engaging in illegal activity. Absolutely no predatory behaviour is allowed on our platforms.

Bumble Inc.'s dedicated Member Safety team is part of a larger collective of teams working to support Trust & Safety on our platforms. These teams work together to implement safety improvements that protect our users. Member Safety is responsible for developing, operationalising, and enforcing policies and standards that govern and adjudicate responsible, safe, inclusive, and respectful behaviour and content on all our platforms, and is focused on ensuring our users have a safe experience using the platforms. Functions across Member Safety include support and integrity operations, law enforcement operations and incident management, safety policies, safety & integrity products, and safety programs.

Child Protection

Bumble is committed to working alongside industry peers to tackle these heinous harms, and this year, became the first dating app company to join the [Technology Coalition](#), an alliance of tech firms seeking to both prevent and combat child sexual exploitation online. Bumble has also signed on to the Voluntary Principles, a framework of high-level commitments against online child sexual exploitation developed by both the private sector and governments across the U.S., U.K., Canada, Australia, and New Zealand. Bumble is also subject to legal obligations to report certain user data either to law enforcement authorities or to designated bodies such as the U.S. National Center for Missing and Exploited Children (“**NCMEC**”).

Safety-by-Design

Our entire product development process is guided by the goal of fostering interactions rooted in kindness, respect, and safety. Keeping our members out of harm is always top-of-mind for us, and our platforms and business are built to be safe by design. Following this principle, we review all our products and features regularly to mitigate safety risks in addition to running routine vulnerability checks on our tech.

Prevention & Reduction

Bumble Inc. invests in technology on an ongoing basis to prevent and reduce online harmful behaviour and content. Our apps provide a variety of user-facing safety functionalities, including but not limited to Block and Unmatch and empowering people to manage their interactions. For example, Private Detector, a safety feature assisted by artificial intelligence (AI), automatically blurs potential lewd images shared on Bumble and Badoo. Members can decide if they would like to view blurred images and are provided with an easy path to reporting the sender if they wish to. In 2022, we open-sourced this technology to enable other tech companies to follow our lead. Bumble Inc. strives to form secure, uplifting communities through a combination of automated features and dedicated human teams.

Community Guidelines

We have also published our new Community Guidelines (for [Bumble Date](#), Bumble for Friends, [Badoo](#).) which provide the most comprehensive overview of our platform policies

yet. They clearly communicate to our members the content and conduct we expect of them. Our community guidelines lay out robust policies that go beyond industry norms and are consistently enforced using appropriate remediation. These processes ensure we are tackling any potential illegal, illicit or harmful behaviour. We continually review our safety protocols in line with best practice and ensure that online safety, including protecting our members from online fraud and scams are addressed. Our members play a critical role in the safety of Bumble by [reporting](#) content or behaviour that may violate our Community Guidelines. Members can use our features such as [Unmatch](#) or [Block & Report](#).

Survivor-Led Initiatives

At Bumble, we try to go a step further in helping our members who have experienced harm. Bumble teamed up with Bloom in an industry-first partnership to provide complimentary online trauma support to members of its global community who experience sexual assault or relationship abuse.

Through this program, members of the Bumble Inc. community are provided with access to Bloom's readily available library of resources for member education created by survivors and trauma-informed therapists on topics such as dating, boundary setting, and healing after trauma, as well as reflective one-to-one chat support with the Bloom team. If someone within the Bumble community reports sexual assault or relationship abuse on or off platform to Bumble's feedback team, they will receive a link for free access to a version of Bloom customized for Bumble users, and in some cases up to six therapy sessions. The service is available in English and Spanish, French, Hindi, Portuguese, and will be launching in German in 2023. The program is available to our global community, no matter where they are located.

Bloom is run by [Chayn](#), a survivor-led nonprofit addressing gender-based violence by creating intersectional resources online. Chayn has championed a "design with, not for" approach - their services are made for survivors by survivors. Since 2020, Chayn has built a team of qualified and trauma-informed staff in addition to their global volunteer network to deepen their outreach and services. Bumble and Bloom also worked together on a custom curriculum in English, Spanish, French, Hindi, Arabic, Portuguese and Urdu.

Further, to help relieve burden of reporting abusive behavior on victims, Bumble has teamed up with Australian nonprofits and advocacy organizations (like Wesnet, Full Stop, Survivor Hub) who help victims of sexual violence, physical abuse, technology-facilitated abuse, and violent discrimination, such as anti-semitism, to streamline the reporting process. We have launched a dedicated cyber tip line for advocates working closely with victim-survivors to report—and for Bumble's safety moderators to potentially remove—abusive or dangerous members. If these people are found to be using the app, they'll receive a warning from Bumble, or can even be removed from the app and banned from creating new accounts, ultimately preventing them from misusing Bumble.

We welcome Ofcom's comprehensive research on categorisation. It is an important opportunity for Ofcom to advise the Government about the variety of platforms operating in and accessed by UK users, their business models, how users interact with them, their functions and features, and their views on risk and mitigation processes. Special regard

should be given to ensuring that the categorisation regime is proportional, rational and effective as policymakers around the world will be liable to follow the UK's approach. Therefore, the opportunity to get this guidance right the first time should not be missed.