

SNAP INC RESPONSE TO OFCOM CALL FOR EVIDENCE: CATEGORISATION

Introduction

Thank you for the opportunity to respond to Ofcom's Call for Evidence on categorisation.

To support our detailed responses to the Call for Evidence, it is first important to understand how Snapchat works and our efforts to serve the well-being of our community as Snap grows and faces new opportunities and challenges.

Snap Inc. is a technology company, which is primarily known for Snapchat – a private, visual messaging platform that seeks to enhance connections between friends and family in a fun and creative way (1:1 or small group chats). [REDACTED]

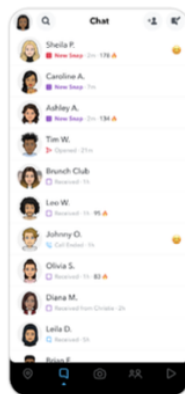
Our utmost priority is protecting the safety of our users whilst ensuring they have a positive experience online. We have clear [Terms of Service](#) and [Community Guidelines](#) which prohibit the use of Snapchat for any illegal or harmful activity and we have always used preventative safety- and privacy-by-design principles to establish our architecture and guide our design processes and decision-making. For example, we purposely designed Snapchat to be different from traditional social media whereby it doesn't open to a public news feed powered by an algorithm with likes and comments. Instead, Snapchat opens to a camera and promotes a culture of self-expression where Snaps delete by default (see our [Privacy Centre](#) for more information).

Over the years, as our community and their interests have grown, so has Snapchat whereby we now have five tabs: Camera, Chat, Map, Stories and Spotlight:

Platform Architecture



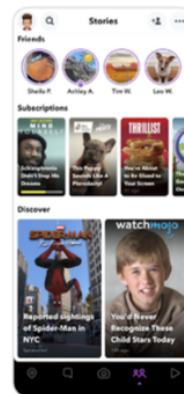
Map



Chat



Camera



Stories



Spotlight

Camera: Snapchat opens to your perspective. It's where Snapchatters can create Snaps, play with Lenses AR experiences, and more.

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Chat: Swipe left from the camera to go to the Friends screen. Here, users can talk with their friends, family and My AI (our chatbot powered by OpenAI's ChatGPT technology) using text and pictures. Chats will show when both friends are there at the same time. They'll also indicate when a friend has opened and viewed a Snap. Snaps and Chats delete-by-default to mirror real life conversations, although users can opt to save Chats by simply tapping on the ones they want to maintain.

Snap Map: On Snap Map, you can view Snaps from all across the world, including sporting events, celebrations, breaking news, and more. You and your friends can also choose to share your locations with each other and see what's going on around you.

Stories: You can find your friends' Stories, Publisher Stories, User Generated Content (UGC) Stories, and more. Stories are collections of Snaps, which last for 24 hours and play in the order they were taken. The 'For You' section has content and recommended Stories from publishers, creators, Snap Stars, and the community.

Spotlight: Right next to Stories is our dedicated entertainment platform, Spotlight. This is where users can submit and watch short, fun, and creative videos for our community.

Detailed responses

1. How do you measure the number of users on your service?

- *Who counts as a user for those purposes? For example, are users defined as individuals who visit the service, individuals who interact with the service, individuals who have an account with the service, or individuals who request the service to host information. If you measure users on your service in more than one way, please include all relevant approaches.*

We typically count registered users who are active on our service. We provide the following public definition of a daily active user: We define a Daily Active User (DAU) as a registered Snapchat user who opens the Snapchat application at least once during a defined 24-hour period. We calculate average DAUs for a particular quarter by adding the number of DAUs on each day of that quarter and dividing that sum by the number of days in that quarter.

- *With what frequency do you measure the number of users on your service? For example, monthly.*

[REDACTED]

- *Do you deduplicate the number of users in your measurements? If so, how?*

[REDACTED]

- *Do you measure different geographic units in relation to numbers of users? For example, country, region, market, global, city.*

[REDACTED]

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- *Do you break down the number of users on your service by their age? For example, child users*

[REDACTED]

- 2. If your service comprises a part on which user-generated content is present and a part on which such content is not present, are you able to distinguish between users of these different parts of the service?**

Yes. As mentioned above, Snapchat has five tabs: Camera, Chat, Maps, Stories and Spotlight. User-generated content is present on Maps, Stories and Spotlight. We measure the number of users per tab.

- 3. Do you measure different segments of users on your service?**

- *Do you segment user measurement by different parts of your service? For example, by website vs app, by product, business unit.*

[REDACTED]

- *Do you segment user measurement into different types of users? For example: creators, accounts holders, active users.*

[REDACTED]

- *How much flexibility does your user measurement system have to define new or custom segments?*

[REDACTED]

- 4. Do you publish any information about the number of users on your service?**

Yes. We publish quarterly user number metrics as part of our quarterly earnings update, these are available on investor.snap.com, which include metrics for the UK. As part of our DSA compliance, we also publish MAU numbers for our European Union users: <https://values.snap.com/privacy/transparency/european-union>

- 5. Do you contribute any user number data to external sources/databases, or help industry measurements systems by tagging or sharing user measurement data? If not, what prevents you from doing so?**

[REDACTED]

- 6. Do you have evidence of functionalities that may affect how easily, quickly and widely content is disseminated on U2U services?**

- *Are there particular functionalities that enable content to be disseminated easily on U2U services?*

- *Are there particular functionalities that enable content to be disseminated quickly on U2U services?*
- *Are there particular functionalities that enable content to be disseminated widely on U2U services?*
- *Are there particular functionalities that prevent content from being easily, quickly and widely disseminated on U2U services?*

As noted above, Snapchat has been designed with the safety and wellbeing of our users in mind. It is **not** a conducive environment for the widespread dissemination or amplification of unvetted or harmful content. In our experience, particular functionalities play a key factor in enabling and preventing content from being easily, quickly and widely disseminated on U2U services, including:

- i. **Short retention period and delete by default** - Privacy is a cornerstone of Snapchat's policies and architecture. Snapchat is about creating and sharing moments with your closest connections and we therefore practise data minimisation, including deleting messages and much content by default. This significantly limits the opportunity in which content can be shared.
- ii. **Know who you are speaking to** - Limiting contact from those who you do not know can mitigate the dissemination of potentially illegal and harmful content. At Snapchat, we offer strong protections to ensure strangers or bad actors cannot easily contact and share content with users:
 - a. Friends lists are not visible to other Snapchatters;
 - b. By default, you cannot receive a message from someone you had not added as a friend or already have in your contacts;
 - c. Teens must have friends in common before surfacing as a friend suggestion to other users; and
 - d. An in-app warning will appear if teens are contacted by a new friend that they do not share minimum mutual friends with and could be suspicious.
- iii. **Limit virality:**
 - a. **No open 'news' feeds** - Displaying an open news feed on users' 'homepage' enables unvetted publishers or individuals to disseminate potentially illegal and harmful content easily, quickly and widely on U2U services. Snapchat does **not** have a news feed.
 - b. **No live content streaming** - Live content streaming cannot be moderated in advance and provides greater risk of easy, quick, and wide dissemination of potentially illegal and harmful content. Snapchat does **not** allow live content to be streamed.
 - c. **No reshare functions** - Providing a re-share functionality that allows automatic resharing of content to a broad audience encourages virality and provides a quick and easy means to widely disseminate potentially illegal and harmful content. Snapchat does **not** offer such an automatic 'reshare' function.
- iv. **Content Moderation** - When we introduced Snapchat's public facing areas, For You (as part of the Stories tab and previously known as Discover) and Spotlight (tab for discovering creators and communities), we recognised the need to introduce strong controls to prevent potentially illegal and harmful content from being easily, quickly and widely disseminated. Content on For You comprises a curated set of media partners, like The Telegraph, the Guardian or Sky, who agree to our [Community Guidelines](#), while Spotlight contains user-generated content that is pre-moderated by our team prior to

being surfaced to large groups of people. These provisions make it difficult for harmful or illegal content to permeate on Snapchat, as confirmed by Ofcom's first year report on the Video Sharing Platforms (VSP) Regulation dated October 2022.¹

- v. **Reporting and Rapid Response** - Effective reporting functionalities, with appropriate median review and response times help to prevent easy, quick and wide dissemination of potentially illegal and harmful content. Snapchat's reporting functionality means that if a user comes across content that is harmful, illegal or makes them uncomfortable, they have a quick, easy and confidential tool to flag the content, which is reviewed and enforced by our global 24/7 Trust and Safety team. Our latest [Transparency Report](#) includes our average response times, which are between 4-30 minutes depending on the severity and risk of harm.

7. Do you have evidence relating to the relationship between user numbers, functionalities and how easily, quickly and widely content is disseminated on U2U services?

Please see our response to Q6 above. Irrespective of our user numbers, our platform design and functionality is key to limiting the ease, pace and spread of content across the platform, especially content that is illegal and/or harmful.

8. Do you have evidence of other objective and measurable factors or characteristics that may be relevant to category 1 threshold conditions?

[REDACTED] Alongside user numbers and functionality, we believe that the **level and proportionality of risk** [REDACTED] on a platform, the **size of the company** and **impacts on commercial interests** should also be considered.

9. Do you have evidence of factors that may affect how content that is illegal or harmful to children is disseminated on U2U services?

- *Are there particular functionalities that play a key role in enabling content that is illegal or harmful to children to be disseminated on U2U services?*

To note, you must be aged 13 and over before joining Snapchat. We want everyone who uses Snapchat to have a safe and positive experience, especially our younger users. Further to our response in Q6 above, we have additional functionalities on Snapchat that impact how content is disseminated to teens and help protect them from illegal or harmful content:

- i. **Age appropriate experience** for 13-17 year olds in our public content spaces (For You and Spotlight) and tougher detection and enforcement mechanisms on accounts trying to promote inappropriate content. This limits exposure to the dissemination of illegal or harmful content. See, for example, the [recent safeguards](#) we announced for 13-17s on Snapchat.
- ii. **No public profiles** for 13-17 year olds which limits their ability to disseminate illegal or harmful content or be targeted as a potential victim by bad actors and exposed to such content (see 'Know who you are speaking to' answer in Q6 above, which also highlights other protections aimed specifically at teens)

¹ Snap moderates popular user-generated content before it is shared widely to users on Discover or Spotlight, making it less likely that harmful content will be found here.

- iii. **Age targeting** prevents younger users from viewing advertisements containing regulated goods or services - i.e. goods or services that are illegal or harmful for children (e.g. alcohol, gambling) [REDACTED].
 - iv. **Parental controls:** Snapchat's Family Centre allows parents and trusted adults to see who their teens are friends with and who they have communicated with on Snapchat in the past seven days. This is designed to instigate real-life conversations between parents and teens about their digital wellbeing and connections to protect them from harmful or illegal content. Parents or trusted adults can also report any suspicious accounts to our Trust & Safety team for review, which further limits the opportunity to disseminate harmful or illegal content to younger users.
- *Do you have evidence relating to the relationship between user numbers, functionalities and how content that is illegal or harmful to children is disseminated on U2U services?*

Please refer to the answer in Q7 above.

10. Do you have evidence of other objective and measurable characteristics that may be relevant to category 2B threshold conditions?

Similar to our response set out in Q8 above, we believe that category 2B threshold conditions should also consider the **level [REDACTED]** and **proportionality of risk** on a platform [REDACTED].

Conclusion

We hope this response is helpful to your research and advice on setting the appropriate thresholds for categorisation under the UK's Online Safety regime. Please let us know if you have any questions or require additional information and we would be happy to discuss in further detail if required. [REDACTED]