

Response coversheet

BASIC DETAILS

Call for evidence title: Second phase of online safety regulation: Protection of children To (Ofcom contact): **Online Safety team, OS-CFE@ofcom.org.uk**

Name of respondent: ✂

Representing (self or organisation/s): Indeed, Inc.

Address (if not received by email): Bank of Scotland House, 124 St Stephen's Green, Dublin , D02 C628, Ireland.

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts? _No_____

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

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Name: ✂

Signed (if hard copy): N/A



Overview

Since inception in 2004, Indeed has put the jobseeker experience at the heart of every decision we make. With more than 300 million unique visitors per month globally, and more than 53 million UK visitors each month, more people find jobs on Indeed than anywhere else; allowing jobseekers to search millions of jobs in more than 60 countries and 28 languages. Globally, over three million employers use Indeed to find and hire new employees, and in the UK, more than 310,000 companies hire people using Indeed.

Fundamentally, for jobseekers, our platform is free to use. We strive to help all jobseekers get jobs, by providing access to all job listings on our platform without fees. As well, we offer free content related to successful job search practices, [labour market insights and analysis](#), industry-specific information, [hiring events for jobseekers](#), and other relevant jobseeker information, which is constantly updated through our [Indeed Career Guide](#). [For employers](#), we offer [free content](#) on how to improve their practices, as well as a number of paid services, including [Indeed Hiring Platform](#), [Sponsored Jobs](#), [Indeed Resume](#), [Indeed Apply](#), [Indeed Featured Employer Program](#), and [Hiring Events](#).

As a service, Indeed seeks to facilitate transparent understanding of potential jobseeker and employer engagement. To that end, [pay and salary transparency](#), [company reviews](#), [salary guides](#), and [workplace wellbeing](#) through Indeed's [Work Happiness Score](#).

With every decision we make, we ask ourselves, "What's best for the jobseeker?" in service of making it faster, easier and safer for people to get a job. Our jobseeker-first mentality ultimately benefits employers, as well, by getting the right people in the right jobs, quickly.

Because of our unique position within the Human Resources and Technology (HR Tech) sectors, Indeed is able to provide subject-matter expertise and insights into online safety regulations, content moderation practices and content risk assessment.

The Site is not for use by anyone under the age of 16. However, if the local laws provide for an alternative minimum age for Indeed to lawfully provide the services in the Site to users, then that shall apply as the applicable minimum age. In all jurisdictions outside the European Union, if users are under the age of 18, or the age of majority in your jurisdiction, users must use Indeed under the supervision of a parent, legal guardian, or a responsible adult. Indeed adopts a range of measures to try to ensure that we do not accept individuals who do not meet the minimum age and any other applicable age requirements.

Children's Access to Services

Indeed does not allow users under the age of 16 to use our platform, as outlined in our [Terms of Service](#). We identify users under the age of 16 via key indicators and age information derived

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from a user's resume and search queries. Once an account indicates that a user is under 16 years of age, we remove the job seeker's account and delete their information.

Indeed Moderation teams are dedicated to thoroughly assessing content and identifying potential risk signals. In the context of protecting children, teams look for specific language, characteristics, and descriptions that may attract children and pose potential harm. In addition to specific characteristics, teams assess factors, such as high-risk industry, or a high-risk country associated with the posting, all of which may increase potential risk. Job postings that include offers for workers under 18 years of age, specific gender identification, and offers with provided accommodations and transportation, are just a few examples of content that is flagged. Any job listing that is flagged and in violation of Indeed's [anti-age discrimination policy](#) is subsequently removed. Our policy states:

Jobs that discriminate on the basis of age, or preferentially recruit on the basis of age, are not allowed on Indeed. Additionally, job posts that specifically target new or recent graduates may potentially be discriminatory and are also not allowed.

In addition to seeking to protect users against illegal content, Indeed takes the privacy of our users very seriously – we operate through privacy by design and privacy by default, in order to maintain the integrity of our platform and the trust that our users place in us to help them find the right jobs and candidates. Our Privacy team responsibly seeks to protect jobseekers and employers by facilitating Data Subject Right (DSR) requests, providing transparency of processing of data through our [Privacy Centre](#) and processing government and private party requests.

In compliance with privacy laws, like the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), we respond to requests from users regarding their personal data. These Data Subject Right requests typically fall into one of two categories: Access Requests and Deletion Requests.

Risk Assessment and Management

Job content that appears on the Indeed site must meet Moderation policies, as well as Country specific regulations. For instance, in the UK, Employers must verify that Employees have the right to work in the Country. Employers posting a job in the UK can specify characteristics that a jobseeker must have in order to have the right to work, such as a minimum legal age of employment. Employers require approved documentation for proof of age and eligibility to work in the country.

Indeed leverages the specialisation of key teams to address threats for all users. These teams analyse a number of risk factors through carefully designed indicators, signals, or red flags, which may represent different forms of risk. Collectively analysing the various forms of risk that

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a given user, or a job posting may demonstrate, allows for the creation of a risk profile and a corresponding action against a user, or a job posting, in order to protect our users from illegal activity or harm.

Each market presents different risk considerations, as well as respective jobseeker populations, including that of underage jobseekers. As with other fraud and safety risks, which Indeed seeks to mitigate, including the use of the platform by underage jobseekers, Indeed is regularly evaluating and assessing new risks, and the appropriate response and mitigation measures to protect all users. The identification of such risk considerations allows for the proper policies, procedures and enforcement actions to take place. For example, an employer which attempts to publish a job posting with specific race requirements would present specific risk considerations related to [racial discrimination](#) and would be actioned against for removal - jobs that discriminate on the basis of race are not allowed on Indeed. As well, such activity is against Indeed's [Personalization and Targeting policy](#).

In further effort of constantly evolving protections of our platform, including that of potential security risks, Indeed established both public and private [bug bounty programs](#), through which over 2,000 researchers flag potential gaps in our systems, in exchange for compensation (up to \$10,000). By crowdsourcing this information from third-party researchers, Indeed is able to leverage key subject-matter expertise, with "fresh eyes," and then allows for internal resources to be dedicated to resolving the identified vulnerabilities.

Terms of Service and Policy Statements

Indeed's content moderation principles seek to prevent any illegal content, exploitation of information, prevent harassment, discrimination or offensive content, and prevent unfair business practices, among many other areas – enforced globally. Our policies and procedures are developed and deployed at the global and individual market levels - depending on local legal and regulatory requirements and market trends. For example, we deploy policies specific to the UK like that of our discrimination, low-quality posting and job types not allowed policies. These localised policies allow us to appropriately operate within legal requirements, while also providing a safe user experience relative to each market.

Increasingly, Indeed's efforts to protect its users are updated, especially in relation to protecting the safety of users beyond just word format content. We seek to ensure that user generated content on our platform is both appropriate and relevant for our users. Indeed seeks to remove bad content from our platform as quickly as possible, to protect our users and retain the credibility of our platform. As well, based on forthcoming regulations, Indeed is seeking to facilitate enhanced communication of its policies and actions to its users - mindful as to share the appropriate information to relevant users, to protect users privacy and to protect proprietary information and practices.



Indeed firmly believes that proper communication of our [terms and policies](#) is important for the safe and proper use of our platform by our users. As well, we seek to provide additional guidance and education, to further benefit the safety of our users. In addition, Indeed voluntarily publishes its [Transparency Report](#) twice a year, which publicly communicates the ways in which we protect the privacy and safety of our users.

Each job listing on Indeed contains a “[Report Job](#)” flagging tool, where users can report to Indeed if they believe a given job posting is in violation of Indeed’s [Terms of Service](#). The reporting tool contains a preloaded category of offense: “It is offensive, discriminatory;” “It seems like a fake job;” “It is inaccurate;” “It is an advertisement;” “Other;” as well as an open field where a user can submit additional information or justification for their reporting of a job.

Within Indeed’s [Support page](#), we offer further explanation of the type of jobs to report:

- [Offensive or Discriminatory](#): Jobs that appear to discriminate based on gender, age, race, religion, disability, or any other characteristic may be reported with this option. Additionally, you may report jobs that have inappropriate or explicit content.
- [Fake](#): Seems suspicious, might be asking for personal information or can’t find it online
- [Spam](#): Not an actual job, may be selling a service or unpaid
- [Discriminatory or offensive](#): Biased or inappropriate language
- [Expired or not available](#): Old or no longer hiring
- [Technical Issue](#): Can’t apply due to an error or broken link
- [Incomplete or incorrect information](#): Details like location are missing or wrong
- [Report concerns of illicit activity](#)
- [Other](#): It’s something else
- Additional information (optional)

In addition, Indeed publishes a series of important educational tips and guidelines in our [Help Centre](#) to help our users [safely and effectively use our platform](#), including:

- [Jobseeker Rights and Resources](#)
- [Guidelines for Safe Job Search](#)
- [How to Verify Suspicious Correspondence from an Employers](#)
- [I May Have Been Scammed, What Can I Do?](#)
- [How to Contact Indeed for Additional Support and Help](#)
- [How to Identify Scam Job Titles on Indeed](#)
- [How to Report a Conversation to Indeed](#)
- [Reporting a Job](#)
- [Accessibility Accommodations](#)

In addition to protecting users of the Indeed platform, we are committed to taking appropriate steps to ensure that everyone who works for Indeed and its affiliates benefit from a working environment in which their [fundamental rights and freedoms are respected](#).



We fully acknowledge the principles and our responsibilities (the “Values”) as provided for in the UN’s International Bill of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and local laws in the jurisdictions in which we are active that reflect those provisions, such as the UK’s Modern Slavery Act. These Values apply within our business and within our supply chain and include:

- respect for the dignity of the individual;
- recognition of the importance of each individual’s human rights;
- securing and increasing equality of opportunity and inclusion;
- not accepting any form of discrimination, harassment or bullying; and
- not tolerating any form of slavery, human trafficking or forced or compulsory labour.

These Values inform all of our policies and processes related to the rights and freedoms of every person who works for us, or with us through our supply chain. We have also developed and implemented policies and processes which are intended to extend these commitments to the Values through our supply chain.

Moderation

Indeed uses automatic and manual means of identifying and removing fraudulent content and accounts from our site as quickly as possible. We put rules in place to flag potentially risky content for review by our moderators, and our Trust & Safety team proactively uses various tools and subject-matter expertise to manually identify any content that the automatic system may miss.

Through these automatic and manual means of identifying fraudulent content, Indeed is able to minimise their impact on our users, especially jobseekers who do not then put themselves at risk.

Indeed protection of user’ safety blends both human and technology tools. We deploy varying moderation escalation processes, depending on the complexity and risk of a given potential infringement against our terms. Our human moderation process involves both internal and third-party vendors, which operate under the same Indeed standard of user safety through training and approved processes.

Combining our internal moderators capabilities with that of third-parties, allows us 24/7 platform coverage. Our blend of moderation allows our technology tools to be utilised, and supplemented through utilisation and oversight by human moderators.

When content is removed, we deploy a series of communications and measures to inform the user of the action taken against them.

We seek to integrate trust and safety, and security measures throughout the development and deployment of all of our products and services. We have a number of specialised and trained

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teams dedicated to various efforts within the entire user safety process, as well as specific trust and safety issue areas, and measures. As well, we deploy a number of filters which seek to limit the type of content that is displayed to each user.

Indeed's Trust and Safety organisation has specific rules that define what content will go through moderation, and in some cases will auto-reject fraudulent accounts. In addition to existing scope of moderation, teams conduct proactive reviews aimed at tracking down fraudulent actors. Fraud metrics reports and trends are shared with internal partners to raise awareness. Trust and Safety teams work collaboratively with Product and Engineering to develop comprehensive tooling, policies and product improvements that work to prevent fraud, scams or abuse on Indeed Products.

Indeed is dedicated to upholding our Trust & Safety policies for all content providers. Actively providing account verification requests, and timely responses to reports of fraud, scams, and illicit activity, by conducting comprehensive investigations on companies, feeds and sources.

Content moderation best practices include the following:

- Minimise negative impact from moderation through process improvement, tooling recommendations, decision accuracy and vendor training.
- Create and maintain moderation guidelines and training for all human moderation teams.
- Analyse regularly the effectiveness of new moderation features, to assess the accuracy and precision of the moderation processes.
- Conduct timely reviews and metrics to aid with implementation of workflow improvements and new tooling.
- Work towards implementing company wide awareness around moderation practices and alerts.