



HM Senior Coroner Mr Andrew Walker
North London Coroner's Service
Barnet Coroner's Court
29 Wood Street
London EN5 4BE

8 December 2022

Dear Senior Coroner

Regulation 28 Report concerning Molly Russell

Thank you for your Prevention of Future Deaths report dated 13 October 2022 in which you asked Pinterest, amongst others, to provide a response following the Inquest into the death of Molly Russell. This response is provided by Pinterest Europe Limited, a designated Interested Person in the Inquest. We provide our response to your report after attending and giving evidence at the Inquest and carefully considering your conclusion and six concerns (which we address below).

In response to your report, we wish to highlight that Pinterest is committed to taking the following actions and plans to actively work to implement these changes by the end of 2023:

1. **To develop ways to further limit the distribution of depressive content on Pinterest to teens.** Molly's case has reinforced that depressive content merits careful treatment. We will develop and test automated signals to understand how best to limit the distribution of depressive content to teens on Pinterest - for example - not showing "more like this" prompts if a teen views a Pin that may be depressive. In addition, we will work to continue ensuring that we do not send notifications containing depressive content to Pinterest users (who we call "Pinner") and ensure that we do not recommend searches for depressive quotes as autocompletes or "ideas you may love" to any Pinner either.
2. **To update our self-harm policy to ensure stricter enforcement, starting with removing certain content for all Pinner, rather than limiting its distribution.** Specifically, we have updated our policies to remove references to self-harm or suicide in artwork, memes, or jokes.
3. **To partner with a third party content checking service with the aim of providing independent testing of our progress in our moderation efforts with respect to self-harm and suicide content on Pinterest.**
4. **To consult with mental health experts to ensure that we are delivering the best possible resources to Pinner who search for self-harm or suicide related content.**



5. To continue to work through the challenges of age assurance with experts, legislators, and the rest of the market.

We also acknowledge and welcome the changing regulatory landscape with respect to content moderation and user safety online. We will take the voluntary actions above in addition to preparing for upcoming legislative changes in this area, both in the UK and beyond.

Introduction and background to Pinterest

We set out below our response to your report after attending and giving evidence at the Inquest and carefully considering your conclusion and six concerns.

By way of background, Pinterest is a visual inspiration platform used by over 400 million people worldwide to discover and save ideas. People typically come to Pinterest to find inspiration for recipes to try, travel ideas, fashion and beauty looks, home and style products to buy, and more. Pinners save these ideas when they discover them on the platform or Internet to 'Boards' which they create and maintain on their 'profile'. Ideas saved onto Boards are called 'Pins'. Many relate to subjects such as fashion, cooking, style, travel and home decor, but other topics such as well-being or self-help issues are also available.

As our users, our Pinners, save and share images and links they find on Pinterest or the Internet, the content of Pins available on the platform varies enormously, and can include content that is prohibited by our Community guidelines (until that content is either reported to and / or discovered by us). We take content moderation seriously, and have worked with external experts to ensure that our policies have detailed guidance on what is considered 'helpful' versus 'harmful', and how to navigate that distinction. Our aim is that these policies keep Pinterest an inspirational space for all of its users.

Our core value is to Put Pinners First. We carefully listened to all of the evidence during the Inquest and Molly's story has reinforced our commitment to making ongoing improvements to help ensure that our platform is a positive and safe space for all Pinners, including teenagers. We want Pinterest to be a place for inspiration and we know that our policies, practices and technologies must always evolve to create a safer and more positive corner of the Internet. We remain committed to listening, learning and engaging in the global conversation between platforms, regulators and civil society about online safety. We believe it is critical for platforms to collectively tackle illegal content, and we hope that the Online Safety Bill achieves a system which has the safety of users at its core. This Prevention of Future Deaths report, and Molly's case more broadly, are critical elements in that ongoing discussion.

We combine human moderation with automated machine learning technologies to reduce policy-violating content on the platform. We continue to review, iterate and update our moderation processes as expert guidance and machine learning technologies evolve, and welcome this report as a critical step in that process.

We are committed to taking the 5 specific actions outlined above in response to your report. Those actions, which will be implemented by the end of 2023, will be taken in addition to monitoring any regulatory or compliance actions required by changes to the law in this area. These actions will also be taken in addition to the key steps we already take to specifically protect users between the ages of 13 and 17 ("teens") on its platform in the UK, as explained in more detail below.



Your Concerns

1. **There was no separation between adults and children on the same platform or no separate platforms for adults and children**
2. **The content was not controlled so as to be age specific**
3. **There was no age verification on registration.**
4. **Algorithms were used to provide content together with adverts.**
5. **That the parent, guardian or carer did not have access to the material being viewed and did not have any control over that material.**
6. **That the child's account was not capable of being separately linked to a parent, guardian or carer's account for monitoring.**

As highlighted and described more fully below, Pinterest commits to the following actions in response to these concerns.

1. **We will develop and test tools to further limit the distribution of sad or depressive content on Pinterest to teens.**

We do not allow anyone under the age of 13 to create a Pinterest account. For users aged 13 and over, we seek to ensure user safety, regardless of the age of the user. As a platform dedicated to positivity, Pinterest is committed to putting the interests of Pinners, including those between 13 and 17, first when designing and developing products that they might access. As such, the content available on Pinterest to users aged 13 to 17 does not differ to the content available to users aged 18 and over (although UK users aged 13 to 17 will not see paid targeted advertising on Pinterest, and will be surfaced separate, age-appropriate information, e.g. about their privacy settings).

Pinterest aspires to be a positive place on the internet and we take a strong approach to prohibiting content that does not fit with our mission to bring everyone the inspiration to create a life they love. Since not all content is inspiring, we have Community guidelines that outline the types of content we do not allow on Pinterest. Pinterest is not a place for hateful content, misinformation, violence, or for the people and groups that spread such content. We have industry-leading policies, including comprehensive policies covering Hateful Activities, Misinformation, Dangerous Actors, Graphic Violence and many more types of harmful content, and we have dedicated reporting options for users to report such content to us. For example, Pinterest prohibits weight loss ads, climate misinformation, child sexual exploitation, illegal drugs, and adult content, including pornography. Our aim is that these policies keep Pinterest safe for all of its users.

With that said, we know we can always improve. Our policies, practices and technologies must always evolve to keep up with new behaviours, trends and technological advances. To date, we have taken various actions to strengthen how we combat policy-violating content on our platform, which have led to significant improvements.

For example:

- We continue to use and improve automated machine learning as a moderation tool to reduce the volume of policy-violating content on our platform.



- We block search results for terms that violate our policies, including terms associated with self-harm, suicide, drug abuse, and eating disorders, and display an advisory that connects users with resources if they or someone they know are struggling.
- We stop content from certain websites dedicated to spreading harmful content from being saved to Pinterest.
- We have implemented dedicated reporting options for users to report policy-violating content to us.
- We keep our policies under review and update them against guidance from external expert organisations.
- We put in place additional measures to help protect Pinner, including those aged between 13 and 17 (for example, additional privacy measures, which are set out in further detail below).
- We partner with external organisations and participate in industry-wide groups to increase awareness, share knowledge and develop industry best practices.
- We support the creation of a safer and more positive experience online and actively engage with legislators globally (including in the UK regarding the Online Safety Bill) in the effort to create a safer Internet.

As additional commitments, we will **develop and test tools to further limit the distribution of depressive content on Pinterest to teens**. Molly's case has highlighted that this issue merits careful treatment. More specifically, we will develop and test automated signals to understand how best to limit the distribution of depressive content to teens on Pinterest - for example - not showing "more like this" prompts if a teen views a Pin that may be depressive. In addition, we will work to continue ensuring that we do not send email notifications containing depressive content to Pinner and ensure that we do not recommend searches for depressive quotes as autocompletes or "ideas you may love" to any Pinner either.

2. We will update our self-harm policy to ensure stricter enforcement.

In addition to the content moderation changes noted above, we have made additional changes to our self-harm policy to ensure stricter enforcement of certain categories of content. We already remove anything that is considered encouraging of self-harm or mocking or bullying. As an additional commitment, we have expanded this policy to also remove, rather than limiting distribution, references to self-harm or suicide in artwork, memes, or jokes.

3. We will partner with a third party content checking service with the aim of providing independent testing of our progress in our moderation efforts with respect to self-harm and suicide content on Pinterest.

With respect to algorithms, our approach is to focus on robust content moderation policies to ensure that, as far as possible, policy-violating content is not available to be distributed on Pinterest (algorithmically or otherwise). However, it still makes its way onto our platform. To moderate it, we take a hybrid approach, employing both automated tools and manual review to take action against this content. More specifically:



- In relation to policy-violating Pins, when our content moderation practices (automated, manual or hybrid) either remove or limit the distribution of such Pins on the platform, Pinterest's algorithms will not identify or recommend those Pins to individuals via search, homefeed, or recommendations. We also undertake additional ad hoc sweeping clean-up efforts. For example, during the first half of 2022 these efforts led to the deactivation of approximately 15,000 Boards containing a total of approximately 2.4m Pins. Separately, as part of the same process, we deactivated approximately 843,000 further Pins.
- We maintain a voluminous Sensitive Terms List which contains a number of blocked search terms, meaning that if a teen searches for the word 'suicide' or similar, it will not return any search results and instead will provide a list of professional helpline resources to contact. Autocomplete searches in the search toolbar are also blocked in relation to blocked terms e.g. users who partially type out the word suicide will not be autoprompted to search for the word 'suicide'. We constantly update this list (including in response to changes in usage), and at the time of writing there were over **50,000** terms on the list.

Although we have maintained robust efforts in these areas, we know we can always improve. As an additional commitment, we are taking a comprehensive review of the groups we partner with to get additional advice and feedback on our policy and enforcement approaches to self-harm with the plan to expand our partnerships in this area. In conjunction with this expanded outreach, we plan to partner with a third party content checking service with the aim of providing independent testing of our progress in moderation efforts with respect to self-harm and suicide content on Pinterest.

4. We will consult with mental health experts to ensure that we are delivering the best possible resources to Pinners who search for self-harm or suicide related content.

We are committed to ensuring that resources for parents remain relevant and useful and are kept up-to-date in light of changes in product functionality. We are aware that other, larger platforms have recently started to introduce enhanced functionality in this area; we are actively considering best practices and will continue this work in 2023.

To help Pinners better understand their privacy choices, we have published a Help Centre article that offers users various privacy resources using language that can be easily understood by typical 13-17 year olds. When a 13-17 year old user registers for a Pinterest account, a prominent pop-up notice containing a link to this article is presented.

In addition to consolidating privacy resources for users, we have also published a Help Centre article for parents of teens on Pinterest. This article explains our minimum age requirements, provides Pinterest privacy resources, and specifies ways for parents to notify us if they suspect their underage child has a Pinterest account.

We also participate in a number of partnerships and programmes in order to develop and implement industry best practices.

- We are part of Samaritan's Online Excellence Programme, a three-year industry-wide programme to promote consistently high standards across the sector in relation to self-harm and suicide content. The programme includes a research and insight programme, industry guidelines to support sites and platforms in managing self-harm and suicide content online using safe and sensitive approaches, an online harms advisory service and a hub of online safety resources.



- We are a member of the Digital Trust & Safety Partnership, which brings together a number of leading technology companies who are committed to developing industry best practices and providing objective and measurable third-party assessments of members' trust and safety practices. The Partnership engages with consumer and user advocates, policymakers, law enforcement, relevant NGOs and various industry-wide experts.
- We regularly engage, individually and with other midsize platforms, in stakeholder discussions around key legislative developments in this area, including making submissions to the UK Government during its Online Harms White Paper consultation. We share the UK government's commitment to addressing online safety because we want Pinterest to be an inspiring and welcoming place for everyone. We also agree with the UK government that *'online safety is a shared responsibility between companies, the government and users.'* We believe it is important for platforms to collectively tackle illegal content and prevent it from simply moving between platforms. We hope that the Online Safety Bill in the UK and Ofcom, as the proposed independent regulator, achieve a system which has user safety and risk management at its heart. Cooperation *between* platforms in achieving online safety is critical in our view, as a greater degree of inter-platform collaboration will be essential to prevent the spread of illegal content online.

5. We will continue to work through the challenges of age assurance with experts, legislators and the rest of the market.

Age assurance is a key priority for Pinterest in order to help protect the safety of both teen Pinner and those too young to open an account (under 13s). These are industry-wide challenges, technological solutions continue to evolve, and we remain committed to exploring the best ways to combat this issue. Unless and until age assurance technology works with greater efficacy, teens will still find ways to circumvent the age assurance process. Similarly, there are active debates regarding whether age assurance regimes may introduce undue burdens on an internet user's privacy by preventing them from visiting a site if they wish to withhold information from an internet platform regarding their identity.

As these debates continue, we are of course aware that regulatory expectations in this area are likely to become more demanding in the medium term, including in the UK. We support the underlying goals of such initiatives. We will continue supporting cross-industry efforts to develop technological solutions to the challenges posed by age assurance, and thereby enhance the safety of younger children on the internet.

We take age assurance measures seriously and continue to monitor best practices in this area. We have taken measures to prevent children below 13 from signing up to use Pinterest. At account registration, we require new users to provide their age. When a Pinner inputs an age below 13, we inform them they are not eligible to join, using a neutral message to discourage any false declarations of age. We also employ blocking mechanisms on mobile and web to prevent users from re-submitting a new age when they are denied access. Further, when we ascertain that a user has self-declared that they are underage on the platform, or when a parent writes in stating that their child is underage, we delete that user's account.

With verification, we allow parents to request deletion of their child's account, as well as access to all personal information associated with their child's account, including Pins saved and private Boards.



As many in the technology industry have noted, the methods for determining the age or age range of an online user is challenging. For this reason, we are continuing to evaluate our approach to age assurance and take into account the UK Information Commissioner's opinion/guidance on this issue.

We have already taken a number of content and privacy measures that specifically protect teens in the UK on the platform:

Advertising Changes

We have ceased displaying paid targeted advertisements to users between age 13 and 17 in the UK.

Adapting Product Experiences for Teens

In addition to providing users with educational resources, we have also adopted a number of changes to Pinterest. For example, for UK teens, privacy personalisation sliders default to "off" and cannot be changed. Teens will not receive personalised Pinterest recommendations based on their off-Pinterest activity, and we will not use their Pinterest activity to advertise Pinterest to them on other services. The privacy personalisation sliders also control the personalisation of advertising using a user's off-Pinterest activity, but this does not apply to teens on Pinterest since they have been excluded from paid targeted advertising, as explained below. For teens, the "Search Privacy" setting is defaulted to "on." The "Search Privacy" setting means that Pinterest users have a tag added to their profiles, which tells Google, Bing, or other search engines not to include their profile information in search results. In addition, teens have notifications defaulted to "off" (excluding routine account service messages), but can choose to receive notifications through their Privacy and Data Settings.

Monitoring Messaging

We have a strong interest in protecting teens from unwanted contact from adults. We recently implemented a significant change to the default messaging settings for teens to make those settings more restrictive. The default messaging settings for teens now prevent strangers from messaging teens. As a result, the default setting for teens blocks messages from individuals not connected to those users on Pinterest.

Pinterest Help Centre

The Pinterest Help Centre also provides information to parents of teens on Pinterest which explains our minimum age requirements, provides Pinterest privacy resources and specifies ways for parents to notify us if they suspect their underage child has a Pinterest account, so it can be deleted.

Other Considerations:

We have considered whether separate platforms for those over and under 18, and/or providing age-specific content to those two groups, would make Pinterest safer.

However, we have concerns about the efficacy of these proposals in achieving safety for teen users, and therefore their proportionality. For example:

- We aspire to create a positive environment for all users through our content moderation efforts, regardless of the user's age. Separating the two age groups would not put a stop to policy-violating content and we would still encounter the same moderation challenges.



Introducing additional and separate content moderation expectations for teen users risks diluting our existing moderation efforts, which since 2017 have led to a significant reduction in the prevalence of high risk content on Pinterest.

- The creation of a two tiered moderation system could undermine efforts and divert resources working diligently to ensure that the Pinterest platform is safe for all users, including those who are over 17 who may also be particularly vulnerable to specific content.

We are therefore currently prioritising improving content moderation processes on the existing, single platform in order to improve the safety of teen and adult users alike.

We appreciate the opportunity to engage on these issues and will continue our commitment to learn and implement best practices in this area. We hope the actions we've outlined will have a meaningful impact as we continue to make improvements.

Signed: _____



On Behalf of Pinterest Europe Limited