

H M Coroner Mr Andrew Walker  
North London Coroner's Service

By email

7 December 2022

Dear H M Coroner Mr Andrew Walker,

Thank you for your initial request for information dated 13th October 2022.

We want to first extend our deepest sympathies to Molly's family for their tragic loss. We know this must continue to be an extremely difficult time for her family and friends.

We recognise our responsibility to our community and users of social media more broadly - a responsibility that extends to the entire technology sector. Before we answer the important questions you raised regarding the current safety protections in place on platforms including Snapchat, we wanted to first briefly set out how Snapchat operates, the overall approach we take to moderating suicidal and self-harm content in particular, and the resources we make available to help protect the mental health and well-being of Snapchat users.

### **About Snapchat**

From the beginning, Snapchat was designed to be different from traditional social media, prioritising the safety, privacy and wellbeing of our community. Unlike other platforms, we don't open to a feed of algorithmically amplified and unvetted content, which can push users into scrolling endless streams of recommended, unmoderated content. Instead of a feed of other people's content, Snapchat opens directly to a camera, encouraging users to express themselves.

At its heart, Snapchat is a visual messaging application designed to encourage users to interact (either 1:1 or in small groups) with their real friends, meaning people they know in real life. In practice, this means that we do not offer an open news feed where unvetted publishers or individuals have the opportunity to broadcast illegal or harmful content to large groups.

Our Discover section, which is the part of the app showing news and entertainment, features media publishers and individual creators. This content is not interspersed with posts from friends. Meanwhile, our Spotlight tab shows the most entertaining photos and videos from within the Snapchat community. Content on Discover and Spotlight is moderated prior to reaching a large audience.

With this approach, which has been in place since Snap's inception, we are able to help stop illegal and harmful content and activity from being surfaced across the public parts of Snapchat.

### **Our Approach to Enforcing against Content Violations**

We expressly prohibit accounts and content that promote or encourage self-harm or suicide, alongside prohibiting other illegal and dangerous material. This is stated clearly in our [Community Guidelines](#)<sup>1</sup> and accompanying [Terms of Service](#)<sup>2</sup>. If content of this nature is identified, human moderators review our user reports and it is promptly removed.

We make it easy and accessible for users to confidentially report violating content, activity or concerns to us directly in the app. Reports are swiftly investigated by our dedicated global content moderation team, which operates around the clock. While Snaps may delete by default or after 24 hours, we can preserve content when reported to us, so that we can properly investigate and enforce against violations of our Community Guidelines.

Whilst we have always prohibited the promotion, glorification and encouragement of self-harm and suicidal content, to provide additional insight and transparency into our moderation efforts, earlier this year we added a dedicated content category for suicide and self-harm to our bi-annual [Transparency Report](#)<sup>3</sup>. This public report summarises, at both global and country-specific levels, the content and accounts Snap Inc. enforced against on Snapchat across a range of categories including harassment and bullying, hate speech and sexually explicit content. We also include the total number of times our Trust and Safety team has shared self-harm prevention and support resources with users in distress.

### **Supporting Our Community**

When our Trust and Safety team reviews a user report and believes that a member of our community may be in distress, we forward self-harm prevention and support resources directly to that user, and escalate the matter to law enforcement in cases of imminent threat to life.

The resources we share are publicly available to all Snapchatters and published [online](#)<sup>4</sup>. For example, in March 2020, we expedited the launch of 'Here For You' in the UK - a dedicated portal within Snapchat, created in partnership with The Samaritans and The Diana Award, which shares resources when Snapchatters search for certain themes related to mental health, anxiety, depression, stress, suicidal thoughts, grief and bullying. We also launched "Safety Snapshot" last year, a dedicated channel available in the Discover section of our app that aims to provide easily digestible tips for users on staying safe and reporting content. This can be accessed by searching "Safety Snapshot" in the Discover tab.

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<sup>1</sup> <https://snap.com/en-GB/community-guidelines>

<sup>2</sup> <https://snap.com/en-GB/terms>

<sup>3</sup> <https://snap.com/en-GB/privacy/transparency>

<sup>4</sup> <https://support.snapchat.com/en-GB/a/Snapchat-Safety>

This summer, we introduced a new in-app tool called Family Centre, which offers parents, carers and other trusted adults insight into who their teens are Friends with and which Friends they recently sent Snaps and Chats to on Snapchat, without revealing the contents of the teens' messages. With this approach, Snap has sought to balance parents' needs for more information with teens' needs for privacy, autonomy and growing independence. Through these tools and resources, we aim to start meaningful conversations amongst parents, carers and teens about online risks, how to stay safe and how to find support if they need it.

We hope this initial overview provides you with a sense of how Snapchat works and our overarching approach to content moderation and support for our community.

In the following section, we have responded to your specific questions regarding the individual features that you mentioned within your report. Please note that we have grouped some questions together in our response.

**(Question 1) There was no separation between adult and child parts of the platform or separate platforms for children and adults and (Question 3) That the content was not controlled so as to be age-specific.**

With regard to your first and third points, to confirm, Snapchat does not currently separate between adult and teen parts of the platform nor do we have a separate platform for children (under 13s are forbidden from having an account on Snapchat) and adults.

We absolutely recognise the importance of ensuring the content and experience on Snapchat is age-appropriate for the user. We have extra protections in place for our community who are below the age of 18 and, as detailed earlier in our response, provide a range of tools of Support Resources for our community - in particular, those who may be vulnerable.

- **Content:**

- Content published in the public facing areas of the app, as detailed earlier in our response, must abide by our Community Guidelines, as well as separate and additional publisher guidelines for Discover publishers, with all content included on the app being suitable for an audience aged 13 and above.
- We have existing safety-by-design features overlaid on top - for example, we do not enable public comments on Discover so as to limit the ability for illegal or harmful content in the comments to go viral and be surfaced to a large number of people.
- In addition, we apply age controls to the Spotlight section of the app which blocks comments from users over the age of 18 on Spotlight content which has been posted by users aged between 13 and 17.

- **Profiles:**
  - By default, a teen must be friends with another user before being able to communicate directly.
  - There are no browsable public profiles for under 18s.
  - Friend lists are not public.
  - We limit the size of group chats and they are not discoverable unless you are in the group or have shared a direct link to the profile.

When a user encounters content that they believe is inappropriate or harmful, they can report it easily and quickly. We provide easy to use and accessible reporting mechanisms for content through our [Support Website](#)<sup>5</sup> and [Safety Centre](#)<sup>6</sup>, and our in-app reporting tool, which Snapchat users can use to report concerns. Even if a person is not logged in or registered on Snapchat, they can still report on our support sites.

**(Question 2) There was no age verification when signing up to the online platform.**

### **Our Approach to Age Verification**

We are deeply committed to ensuring children under the age of 13 are not able to access Snapchat and we approach this in the following ways.

- **Age verification at sign-up:** At the point of sign-up, new users are required to provide their date of birth when they register. When a potential user enters a date of birth below the age of 13 during the registration process, the process fails. We do not inform individuals that their registration failed due to their age and, on the web, we set a cookie to discourage repeated registration attempts. If we later become aware that a Snapchat user is under the age of 13, we terminate that user's account and delete the user's data. There are also other measures we can take, such as blocking their device.
- **Strict guidelines in our approach to marketing the app:** Snap does not market Snapchat to children. It is not available in the "Kids" or "Family" sections of any app store. Snapchat is rated 12+ in the Apple app store and rated Teen in the Google Play store, putting parents on notice that Snapchat is not designed for children. These ratings reflect Snapchat's content, which is designed for teens and adults, and not children under 13 years of age.

### **Long Term Solutions to the Challenge of Age Assurance**

We are committed to continuing our work with government, regulators and industry partners to identify genuinely robust, scalable and proportionate industry-wide, long-term age-assuring

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<sup>5</sup> <https://support.snapchat.com/en-GB>

<sup>6</sup> <https://snap.com/en-GB/safety/safety-center>

approaches that could be internationally applicable, to further limit the ability for underage users to access apps.

It is well recognised by government, regulators and industry that age assurance of young people is complex, with ongoing sincere concerns shared by us and other stakeholders around privacy, bias and inaccuracy. We remain committed to finding the most effective approaches whilst also protecting the privacy and data safeguards that are integral to the trust and safety of our community.

We believe that in the short to medium term, the key to developing workable solutions in this area is to capture the widest possible community of stakeholders by focusing on the components of the age verification process that have the greatest potential for impact in addressing this.

Interaction with either one of the two app stores is a key gateway through which all users must pass before they can install apps on their phones. The two app stores are run by the two major operating system providers - Apple and Google. Introducing the two companies' comprehensive family suites of safety and wellbeing tools - age-gates, screen time limiters, downtime setting, monitoring app downloads and in-app purchases, white/black lists, etc - when signing up to the app stores would identify any underage users who somehow fell through earlier (and unavoidable) entry points. We believe this to be the most viable opportunity for a robust, comprehensive and industry-wide age verification system to be developed and located. All the more so given the existence in both stores of credit-card-based verification for parents and carers.

Improving those existing gate-keeping mechanisms by which users already select and access the majority of their apps would be a more effective, and scalable, tool to ensure children are only accessing apps which are both age-appropriate and acceptable to their parents or carers.

Expanding this thinking to a more holistic approach would also allocate responsibilities to other stakeholders in the value chain. Access to, and use of, applications require the user to pass through at least two technology "layers" before reaching the app store and operating system: the mobile operator's data network and the hardware.

Children, by and large, do not buy their own phones. At the point of purchase, the purchaser (usually, the parent or carer) could be guided through the options to configure, in an age-appropriate manner, the phone's safety parameters using the operating system tools provided, including linking to a family account with age-verification options controlled by a parent or carer for younger children.

Similarly, in general, children do not sign up or pay for mobile data subscriptions. At the point of purchase, small changes to the purchase flow could be designed so that the purchaser would

be guided through the options to configure, in an age-appropriate manner, both the phone's safety parameters using the operating system tools, as well as the mobile network operators' own tools, such as age-gates, white/black lists and parental filters.

**(Question 4) That algorithms were used to provide content together with adverts.**

Unlike traditional social media platforms, we don't have a feed of unvetted or unmoderated public content. Whilst we do have some algorithms operating on content on Discover and Spotlight (the public areas of our app), the moderated and curated nature of this section means that we already have tight limits over what is being surfaced. As such, we believe our core architecture and design decisions which prioritise safety limit the risk of algorithms that are operating on our platform.

We place a high value on transparency, especially on how our platform works. Our [Support Page](#)<sup>7</sup> provides additional information on how we rank content on Spotlight. We also have a [Support Page](#)<sup>8</sup> on ranking content on Discover. It is important to note that content on Discover, the other public facing area of the app, comes from feature content from verified media publishers, such as Teen Vogue and the Economist, and content creators.

**(Question 5) That the parent, guardian or carer did not have access, to the material being viewed or any control over that material AND (Question 6) That the child's account was not capable of being separately linked to the parent, guardian or carer's account for monitoring**

Overall, we recognise Snapchat plays a central role in our community's life and for many young people, it's where their most trusted and important relationships live. It's a responsibility we take incredibly seriously. We also recognise that for many parents who haven't grown up with the platform, Snapchat is less familiar. That's why earlier this year, we introduced Family Centre.<sup>9</sup>

Family Centre is an in-app tool which gives parents the ability to know who their teenage children are friends with on Snapchat and which Friends they have recently sent Chats and Snaps, while still respecting young people's desire for some level of autonomy and privacy. This tool was developed in close collaboration with families to understand the needs of parents, carers, trusted adults and teenagers, as well as global experts in online safety and wellbeing. Family Centre allows parents to see their teen's friend list (which is private for under 18s on the app), in addition to who they have been communicating with over the last seven days.

In the coming months, we will add additional features to Family Centre, including new content controls for parents and the ability for teens to notify their parents when they report an account or a piece of content to us. This is in recognition of the fact that, whilst we closely moderate and

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<sup>7</sup> <https://support.snapchat.com/en-GB/a/how-we-rank-content-spotlight>

<sup>8</sup> <https://support.snapchat.com/en-GB/a/how-we-rank-content-discover>

<sup>9</sup> <https://snap.com/en-GB/safety-and-impact/post/family-center>

curate both our content and entertainment platforms and don't allow unvetted content to reach a large audience on Snapchat, each family has different views on what content may be appropriate for their teens. We, therefore, want to give them the option to make those personal decisions based on, among other things, the teen's age, maturity level and the family's values.

## **Conclusion**

The safety and wellbeing of our community is of utmost priority and we remain committed to our continuous work to help keep Snapchat safe. We are deeply sorry for the tragic loss that Molly's family and friends have suffered and we hope this response provides a full picture of the ongoing efforts within Snap to address the industry-wide concerns you shared in your report.

To recap, this includes:

- **Introducing a range of new resources to help Snapchatters manage their mental health, safety and well-being**, including 'Here For You' and our 'Safety Snapshot' Discover channel.
- **Adding suicide and self-harm content as a stand-alone category in our bi-annual Transparency Report**, as a way of providing additional insight and transparency into our moderation efforts on this important subject.
- **A continued commitment to age-assuring solutions**. We are continuing to work, globally, with government, regulators and industry partners to identify proportionate, innovative and long-term age-assuring solutions. This is an evolving landscape with emerging technologies and approaches developing which we are constantly monitoring with a view to find a long term solution.
- **Introducing Snapchat's Family Centre** - a tool designed to offer parents, carers and other trusted adults insight into their teens' Friends and which Friends they have recently sent private messages on the app, while at the same time protecting teens' privacy, autonomy and growing independence. Parents or carers can view their teens' friends' lists, see who they communicated with in the last seven days and report to Snap accounts that may be of concern to them. Additional features are planned for release in the coming months.
- **Pre-moderated public content on Snapchat**.
  - Across our app, we limit opportunities for potentially harmful content to 'go viral'.
  - All content on Spotlight and Discover is pre-moderated, making it a safer experience. Our content platform, Discover, only features content from approved media publishers and content creators and Spotlight is moderated using automated review for all content and human review before any content can reach a large audience



- **Our recently refreshed and expanded Global Safety Advisory Board** - led by Head of Global Platform Safety Jacqueline Beauchere MBE, this group brings together leading safety experts, including three UK members (of an 18-strong global board), to educate, challenge, raise issues and advise Snap on how to keep the Snapchat community safe.

Our experts bring a wealth of experience, including those who specialise in combating bullying, teenage mental ill health and related risks.

- **Extra protections for under 18s:**
  - By default, teens have to be mutual friends on Snapchat before they can start communicating with each other.
  - Friend lists are private, and we don't allow users under the age of 18 to have public profiles.
  - And we have protections in place to make it harder for strangers to find teens. For example, teens only show up as a "suggested friend" or in search results in limited instances, like if they have three mutual friends in common.

In response to your original report, relating to action taken or proposed to be taken, we hope the information detailed throughout our response explains how our model is different to other open newsfeed platforms. We recognise that we have an ongoing responsibility to proactively support our community when they are vulnerable, which is why we have introduced a number of additional Support Resources, including measures for under 18s, which we have included in this response.

Once again, we would like to extend our deepest sympathies to Molly's loved ones for their tragic loss.

If you have any additional questions with regards to Snapchat, please do not hesitate to respond to me.

Yours sincerely,



Director, EMEA Public Policy