

# Women and Equalities Committee

## Oral evidence: Changing the perfect picture: an inquiry into body image, HC 274

Wednesday 16 December 2020

Ordered by the House of Commons to be published on 16 December 2020.

[Watch the meeting](#)

Members present: Caroline Nokes (Chair); Theo Clarke; Elliot Colburn; Angela Crawley; Alex Davies-Jones; Peter Gibson; Kim Johnson; Kate Osborne; Bell Ribeiro-Addy.

Questions 133 – 168

### Witnesses

[I:](#) Alexandra Evans, Head of Child Safety Public Policy, Europe, TikTok; Henry Turnbull, Head of Public Policy, UK & the Nordics, Snap Inc.; Richard Earley, UK Public Policy Manager, Facebook Inc.



## Examination of witnesses

Witnesses: Alexandra Evans, Henry Turnbull and Richard Earley.

Q133 **Chair:** Good afternoon and welcome to the Women and Equalities Select Committee's evidence session on "Changing the perfect picture: an inquiry into body image". This afternoon we have as our witnesses Richard Earley, UK public policy manager at Facebook, Henry Turnbull, head of public policy at Snap Inc., and Alexandra Evans, head of child safety and public policy, Europe, for TikTok. Thank you very much for coming to attend this afternoon's evidence session.

I will start with the first question. I will come to all of you in turn on this, but it would be really helpful if you could give us a picture of how many users there are on your platforms across the United Kingdom and a breakdown of their ages, please.

**Alexandra Evans:** Thank you very much for the invitation to appear this afternoon. We do not, I am afraid, share the information in relation to the UK, but I can tell you that across Europe we have just hit the 100 million monthly user mark. We also do not break down across age groups, but I can say that we are growing at pace across all age groups. Of course, as head of child safety, young people are my key constituents.

Q134 **Chair:** Can I just ask something on that? You say you are growing across all age groups. Although you do not give a breakdown across age groups, is it possible for you to give us an indication as to whether there are some age groups where you are growing faster than others?

**Alexandra Evans:** We are really closely associated with Gen Z, but in terms of user growth we do see quite rapid growth in older demographics as well. Unfortunately, I cannot give you the specifics, but I would say that across the board we are ageing up.

**Henry Turnbull:** Thank you for the opportunity to be here today. I do not know the precise number, but we have over 12 million people who use the Snapchat app every day. In terms of our largest age demographic, it is 13 to 24. I do not have a precise number, again, but our data shows that Snapchat reaches 90% of people in that age demographic, 13 to 24, in the UK.

**Richard Earley:** I am here representing Facebook the company, which provides both Facebook the app and also Instagram. There are more than 3 billion people who use one of Facebook's products globally every month, and around 1 billion globally who use Instagram. I do not have exact figures for the UK, but there are around 40 million users of Facebook every month and around 30 million users of Instagram. When it comes to age, we also do not provide figures that break them down into teenage and non-teenage, but I can say that it is certainly a younger demographic who uses Instagram, as I am sure the Committee will be aware.

Q135 **Elliot Colburn:** I want to start by asking all of you about body



## HOUSE OF COMMONS

dissatisfaction. We have had evidence that high social media use correlates with a higher risk of body dissatisfaction. How do you feel your platforms contribute to appearance pressures for young people in the UK?

**Alexandra Evans:** Negative body image is a hugely important issue, not just because we know that for some people that will lead to mental health impacts that could include the possibility of developing an eating disorder, but also because we know there are significant equality and opportunity impacts, specifically for young girls in particular. I have been listening to your evidence sessions and I have read the written evidence. You have heard that social media platforms can be a force that is positive and a force that is negative.

We are absolutely committed to making sure TikTok is a force for good. I am definitely not going to tell you that there are not people on our platform who are struggling with their sense of self and body dissatisfaction, but we take our responsibility to try to promote a positive body image really seriously. We are doing that ourselves proactively through campaigns like body positivity, which has had over 2 billion views.

I do not know how much you know about TikTok, but I would say it is quite well placed in terms of creating a positive environment for people who might feel they have problems with body dissatisfaction. It is a place where people feel really welcome and accepted. From my perspective, there is no homogenised TikTok look. The people who do well do well because they have a connection with people; there is a certain informality to our videos and the kinds of things our creators are producing.

We just produced our "TikTok Top 100" for the year. If you looked at that, you would see that there is certainly no homogenised version; there is no need to try to fulfil an idealised and very constrained sense of beauty. It is absolutely about coming to the platform and sharing your sense of self and who you are. With the greatest of respect to all of our wonderful creators, fulfilling this perfect beauty image is not a criterion for success on our platform. It is about being authentic, being honest and being yourself, whatever that means, with full diversity and fabulousness of body shapes and looks.

**Henry Turnbull:** Just to echo what Alexandra said, we absolutely recognise that online platforms can have an important impact on young people's mental health, including body image issues, and that impact can be both positive and negative. That is something that is demonstrated by the research the Committee has produced.

At Snap, we recognise that we have a responsibility to ensure our users can enjoy Snapchat and do so in a way that is safe and positive. A key part of this is ensuring that their experience on Snapchat is not somehow contributing to making them feel pressured to look a certain way or making them feel inadequate in some way. These features have been embedded into Snapchat's design for years. We were designed with these issues in



## HOUSE OF COMMONS

mind and designed to be a place where people feel free to be themselves rather than pressured to look perfect.

That is why we have never offered features such as a “like” button on snaps and stories, the ability to publicly comment on content on Snapchat or the option to make your list of friends visible, all of which are things that can add to social pressure. It was also a motive for our first innovation on Snapchat, the fact that user-generated content is ephemeral or disappearing. Snaps and messages disappear after viewing; stories last for 24 hours. The aim is to encourage genuine self-expression in the moment rather than being concerned about creating a supposedly perfect image of yourself that could then be shared onwards or saved.

We do work to promote body positivity and diversity in the app as well as offering support for users who might be struggling with related issues. We have also conducted research in this area and acted on it, and I am very happy to expand on any of these points if it is helpful for the Committee, now or later in the session.

**Q136 Elliot Colburn:** I want to come on to research in a minute. Before we do that, I want to bring in Richard on this point about appearance pressures.

**Richard Earley:** In common with the evidence the Committee has been hearing, we know that body image has a wide range of causes. They can be biological, genetic or environmental. When it comes to the environment factors, certainly social media like Facebook and Instagram can be one of those factors. It is important to remember that this is alongside the traditional media, advertising and also friends and family.

We really want places like Facebook and Instagram to be communities or places that people can come to build community and to feel safe and secure. We have seen many people gravitating towards Instagram in particular as a place to share their experiences of their own journeys with body issues and to campaign on things like body positivity. We know the body positivity movement has really found a home on Instagram, as well as the body acceptance movement. Our users are already doing an awful lot of that positive work.

What we want to do ourselves as a company is to spotlight and bring more attention to those campaigners. An example of that is that on Instagram we run the @instagram account, which has more than 300 million followers. It is the most followed social media account in the world. We have used that to spotlight content and posts by some body positivity activists in the UK. We have also partnered with anti-bullying practices and used the account like that.

There are things we can do online, and there are also things we try to do offline. We have a number of partnerships here in the UK with charities such as the Diana Award and Media Smart, which runs body image and awareness courses in schools. We are really committed to continuing to work with those experts.



All that having been said, it is clearly the case that when some people come to social media, including Instagram, they feel a pressure to look a certain way. We want to take proactive steps to try to counter that and address that. We do that in a number of different ways. That is partly through advertising and having rules for what kind sort of advertising can be put on the platform to try to tackle attempts to damage self-image.

For some of the more serious and complex questions like mental health, which we were discussing a moment ago, we have policies and rules around what our users can say and do. Whenever we write those rules and make those decisions, we are conscious that we are not the experts on those topics, so we work hand in hand with doctors, people with lived experience, NGOs and charities to set those rules in the right place.

**Q137 Elliot Colburn:** Henry, can I come back to this point that you raised about research? One of my questions for all three of you was going to be about whether you had funded any research into the impacts of the platform on body image. That question has already been answered, but I will move to my supplementary with you, Henry. Many of the people who have given evidence to us have said that they are keen to work with social media companies on body image. Could you tell us a little more about the research that you have done, what it told you, what you have done as a result of that research and whether you have a willingness and a commitment to work with academics and Government on continuing that research into how social media might affect body image?

**Henry Turnbull:** Absolutely, yes. This is a really big area of focus for us. Last year we conducted quite a wide-ranging programme of research looking at how teens and young adults—this is anyone in that 13-to-24 age bracket—approached mental health and wellbeing across a number of areas. Importantly, that research has informed the steps we have taken in the app to support our community.

Our research—similar in some ways to the research that the Committee pulled together—showed that young people are incredibly attuned to and deeply affected by issues around mental health and wellbeing: 83% of the people we interviewed reported experiencing stress; 77% experienced anxiety; and 66% reported mental issues around body issues.

Our research showed a couple of interesting things. First, friends tend to be the first line of defence when dealing with these challenges. Rather than going to parents, teachers or therapists, young people instinctively turn to their friends first. Having someone to unload to about these issues was identified by participants as a really important first step in dealing with these problems.

As a platform that is designed for and geared towards communicating with close friends, we felt we had an opportunity to address some of these issues in the app itself. This research helped inform our “Here For You” initiative, which we launched earlier this year. This basically surfaces in-app support for Snapchat users that might be experiencing mental health or



emotional issues or who are curious to learn more about these issues to help friends who might be dealing with them.

We designed tailored content with a range of UK specialist organisations, including YoungMinds, Samaritans and the Diana Award to surface this content when users are searching in the app for phrases related to anxiety, depression, stress, grief, suicidal thoughts, et cetera. There is also “Here For You” content that is specifically aimed at eating disorders and body image issues. That is being developed with the US-based National Eating Disorders Association. Also, building on this, we partnered with Headspace to produce a mini-app within Snapchat that offers free meditation tools to support users’ mental health and emotional wellbeing. Again building on what we learned about friendship, that app provides tools for users to do meditation exercises with their friends in the app, to check in with friends about how they are doing and also to send encouraging messages to friends who might be going through a tough time.

Finally, this research helped inform some of the entertainment content that we produce in Snapchat, which are like mini TV shows. We launched a Snap Original show, “Mind Yourself”, that offered an honest look at teens’ mental health journeys, including looking at issues around eating disorders. We also develop content challenging traditional ideas of beauty and promoting body positivity. I have a couple of examples. We have one show called “Beyond Beauty”, produced in collaboration with Vice, and another show called “The Honeybeez of ASU”, which promotes body positivity.

To round up, what I would say is that, looking forward, mental health remains a massive priority for us at Snapchat. We are starting to think about how we can build on that research and think about our programme of research for the next year. Our aim is always to understand how the community is feeling about specific issues but then, critically, how we can act on that and design resources to help them.

**Q138 Elliot Colburn:** That is very interesting. Alexandra, has TikTok done any similar kind of research, or would it be open to committing to do so?

**Alexandra Evans:** I need to be honest about the fact that we are a younger platform and we do not have as much of an infrastructure around research as perhaps the other platforms that are here before you today. When we are developing our policies, we think very hard about how we should be producing them. We work with experts internally; we have lead policy experts, who lead our eating disorder strategies. When we develop them, we want to make sure we are doing it in a way that is very evidence-based and is based on the lived experience of those who are in recovery from eating disorders.

Recently we worked with Beat, the UK eating disorder charity, to put on a roundtable where those with lived experience were incredibly generous in sharing their experiences, how their eating disorder had manifested in the online world and how it had either provided a moment of support or how it had potentially amplified the issues they were struggling with.



## HOUSE OF COMMONS

Additionally, we asked them some questions about what the recovery process was and how they felt social media might impact in terms of triggering content. It was amazing for us to hear that conversation. Some of the issues they were describing around the types of content they found triggering were really nuanced. They felt that content that you or I might have found quite benign had a dog-whistle element to it in terms of feeling that the person who might have been talking about their recovery was in fact still, for example, quantifying their own eating disorder through certain metrics. It was really useful for us in terms of iterating around how we would respond and in terms of offering support to those with lived experience and those who might be triggered on our platform.

The other thing we are doing now is trying to work out what questions still remain unanswered. That is something we are really grateful to this Committee for, because you have meaningfully moved forward the debate and the evidence base in what you have been doing over the last few months, but there are still some questions that need to be answered. In particular, this is about how non-typical or less well-known types of eating disorder manifest in the online world and also that moment of intersectionality. What is it about being, for example, from an ethnic minority group or being a member of the trans community that might impact or potentially amplify your risk in terms of body image and body dissatisfaction, and also might cause you particular difficulties in relation to your recovery?

We are really humble about the fact that there is more to know and more to understand, but we want, at all times, to be working with academics, psychologists, behavioural scientists, nutritionists, dieticians, child development experts, psychologists and, as I say, those who are struggling or who have struggled, in order to move our understanding forward. You asked whether or not we would be willing to work with the Government or NGOs in relation to that. Of course, we are absolutely committed to that. We work collectively and globally across all of our territories and markets where we operate to make sure we are constantly drawing on expert opinion and advice wherever we can in formulating our own strategies.

**Q139 Elliot Colburn:** Richard, can I finally turn to you on this question of research? Have Facebook or Instagram commissioned any of their own? Would they be willing to work with others to do so in the future?

**Richard Earley:** I really want to second what Alexandra said about the importance of further research into areas such as how intersectional identities are affected by things like eating disorders on social media. We have done a lot of research internally on how our users' wellbeing is affected by different uses of our platform, but, at the Chair's suggestion, I might come on to that when we talk later on about how the platforms work.

There were two things I wanted to raise. First, Henry's point about finding that young people tend to turn to other young people for advice is something that has really been backed up by the conversations we have with young people and our partners who represent young people. We are



in a partnership with both Childnet and the Diana Award to support their digital safety ambassadors' programme, which is about equipping young people themselves to be individuals that their peers can come to for advice. The Diana Award created a special body image module called the "Pressure for Perfection" within their courses, which has had more than 20,000 downloads by teachers since it was launched. We think there is a real appetite for that kind of support.

Secondly, there is some research emerging from some of the academics we have worked with outside of Facebook to talk about the impact of different kinds of content and the different kinds of posts that people see. I have highlighted a couple of things about this in my written evidence to the Committee, but Ysabel Gerrard, who is a researcher working out of Sheffield, has published some research about how people seeing body-positive content on social media really can have a positive impact on their own body image, which is promising. There is a lot more we could study. Just in the last year, we have launched several new research grants out of Instagram for research into the impact of Instagram on wellbeing. We released six grants at the end of 2019. Those have not come back yet, but I would be really happy to keep the Committee up to date when they are.

I just want to make one last point before I finish. You talked about collaboration. I hear very much the concern that has been expressed by some of the academics who have given evidence to the Committee—I hear this from academics in other areas too—about the challenges in working with tech companies to get access to the data that is necessary to be able to study and draw conclusions about the impacts of our services. This has been very challenging for us and for all social media and tech companies, because of the need to balance our responsibilities to protect users' data, which I am sure the Committee will have heard before.

I was really encouraged yesterday when the Government, in its online harms final response, mentioned that they would be asking Ofcom to carry out some work to bring together academics and tech companies to understand what the legal constraints and difficulties are that are impeding this kind of research and to find ways to unblock those and facilitate greater research. As Facebook and Instagram, we would be really pleased to take part in that.

**Q140 Kate Osborne:** Good afternoon to you all. These questions are to all three of you. We have heard lots of evidence on social media algorithms and body image. How do algorithms function on your platforms and how do you decide what content is viewed by each user?

**Richard Earley:** Thank you for the question. It is worth saying a bit up front about what we mean when we talk about algorithms, because this word gets used a lot by tech folks like us and it is not always clear what we mean. An algorithm is just a way of making a decision, and the decision we need to make at Facebook and Instagram is this: when you open your app, what is the first thing you see? When you go to a certain part of the app, what is the first thing you see?



## HOUSE OF COMMONS

The average Facebook user has around 300 friends. If you are like the average Facebook or Instagram user, there are a huge number of different posts and pictures that we could show you when you open that phone. What we do is we look at the collection of posts we could show you and we use different signals about you to decide how we should order them. We do that in a very particular way. The intention of that ordering is to put at the top of your feed the posts we think you are most likely to interact with: to like, comment on, share with friends, etc.

The reason we do that is because, as I mentioned, we did some research a few years ago about the impact of using our platform on people's wellbeing. What that research told us was that things like passively scrolling through social media can be correlated with lower outcomes and negative wellbeing whereas actions such as engaging, clicking, liking, commenting and sharing are correlated with more positive outcomes for wellbeing. That is the reason why, across both Instagram and Facebook, we use that as the guiding light for what posts we should put at the top of your feed and how the algorithm works.

There are, of course, some safety constraints around that. Every community has rules and policies about what is and is not allowed, and we have our policies called the community standards, or community guidelines on Instagram, for content that is not allowed on our platform, which we remove. Additionally, when it comes to that algorithmic ranking process, we also deliberately show lower some kinds of content that does not break our rules but that is sensitive or otherwise our users tell us they do not like.

Lastly, there is a slightly different way that this works in what we call our recommendations. If you open something like the "Explore" tab in Instagram, for example, there you will see recommendations that are from accounts that you have not personally chosen to follow. Everything you see in your feed will be something you personally have chosen to follow and, on Facebook, something you have personally liked or a group you have joined. In the recommendation places, we are showing you extra posts or people we think you will be interested in. Because that is an additional connection you have not made yourself, we have higher standards there for what kinds of content we promote.

Q141 **Kate Osborne:** Henry, can you tell us a little bit about how it works in your platform, please?

**Henry Turnbull:** Of course, yes. I might just spend a bit of time explaining how Snapchat works. I am conscious that the Committee might not be Snapchat users. I will then talk about algorithms specifically.

Snapchat is a different platform to many of the other social media platforms in this space. We really would not categorise ourselves as social media. Really, Snapchat is visual messaging, predominantly designed for private communications, either one to one or in small groups. As I mentioned



## HOUSE OF COMMONS

before, the app is geared towards communicating with your close friends and your family in a fun and visual way.

It is much more geared towards creativity than consumption. On Snapchat, you open into the camera rather than into a news feed. That is a design choice that nudges the user to engage with the camera and the world around them, capture a moment and send it to a friend rather than necessarily scrolling through content.

In terms of the build of the app, you have the private messaging element. You also have the public-facing side of Snapchat, which is our “Discover” tab for news and entertainment and our “Spotlight” tab for the community’s most popular snaps. Importantly, all of the content in those elements of the app is provided either by media partners like the *Telegraph* or Sky Sports in the UK or is user-generated content that is pre-moderated by our team prior to being surfaced in the app, which means we can prevent some of the more harmful content from appearing in that public-facing element of the app.

In terms of algorithms, at Snap our first innovation was disappearing messages. It has always been a privacy-focused platform. We really do not granularly target our users through sophisticated personalisation algorithms. We practise data minimisation, which means that all of our products and features are designed to collect and store as little user data as possible.

We do infer users’ interests over time based on content that they have engaged with in order to optimise their experience in the app, but the way that works is slightly different. For example, if you have engaged with a lot of animal-related content on Snapchat, we may determine that you are a dog-lover and you might see more animal-related content or ads. If you have engaged with yoga content, you might see more content or ads about yoga, health or fitness, but any user can just go into their app and, with a few clicks, access this page called “Lifestyle and Interests”, and you can see the lifestyle categories the app has inferred that you are interested in and then opt in or out of different things. If you look at that and you say, “Actually, I am not a dog-lover at all, but I am a fine-arts enthusiast”, you can opt into the relevant categories and you might start seeing more content and more ads that are relevant to that. We do not really try to target at that super-personal level. It is about inferring interests more broadly.

The last thing I would say on this is that our space for public content, which I mentioned earlier, is shared between popular accounts and news and entertainment agencies. We look to ensure there is a diversity of content and different perspectives there rather than necessarily that hyper-personalised rabbit hole of content that you might find if there was an incredibly sophisticated algorithm there.

**Alexandra Evans:** Like Snap, it is possible that the Committee are not avid TikTokers, although I hope you are, of course. I am just going to give



## HOUSE OF COMMONS

you a little top view on the algorithm and how it works on TikTok, because I know the Committee is particularly interested in how the algorithm might potentially be driving problematic viewing behaviours or enhancing people's sense of dissatisfaction about their body image.

Our algorithm drives something called our "For You" feed. The "For You" feed is the stream of videos that we suggest to our users when they open the app. The videos on TikTok are really, really short. Typically, you are never going to get anything above 60 seconds; typically, they are much shorter than that. The minimum it can be is 15 seconds. If you are on our platform even for a really short amount of time, you are going to end up seeing a really large number of videos. For us, it is really important that diversity is essentially baked into our algorithm. We are constantly thinking of ways in which we can diversify the content a user is exposed to. Frankly, otherwise, they would lose interest quite quickly.

Once we understand someone's interests, it is not that we are trying then to home in; it is that we are then trying to work our patterns in terms of what it is they might like. I think about it in terms of complementary colours. If your interests suggest that you might like blue, perhaps you might like yellow. We are going to be offering content that is complementary and that is diversified. We also build into that diversification a sense of surprise as well. We are constantly trying to encourage people to expand their horizons.

I would also say that, actually, as I say, TikTok is inherently a platform with a diversity of race, ethnicity, gender and sexuality. This is sort of baked into it. We do not have a homogenised content stream. The content we might be drawing from is itself diverse. I am quite confident that when people come on to our platform they are not being focused in a single direction.

In any event, if a user prefers not to see a video or prefers not to see videos of that type, that can simply pull down the button on the video and click on the "I'm not interested" function, which is a way of then directing away from that type of content, and they will not see it again.

**Q142 Kate Osborne:** My next question again is to all of you. It is important for people to feel represented and reflected in the images around them. Alexandra, you have already given us a flavour of this. How do you ensure diversity in the images we see on social media or on your platform, given your algorithms?

**Richard Earley:** Although it is possible that the Committee might be more familiar with Facebook and Instagram than they are with my colleagues at the table here, I will just briefly say that the intention behind Instagram is to have a place where people can find and pursue their interests and connect with the communities and issues they care about. It is up to the user to follow the accounts they want to.



## HOUSE OF COMMONS

We also recommend some content; I have spoken about this in the recommendations. In the places where we are recommending people content, there is a diversity of different types of content that we think you might like. Again, as the other companies have said, this is based on the signals we have gleaned from what kinds of topics, hashtags or videos you have liked in the past.

When it comes to promoting diversity, the best thing I can say is that, as well as it being our intention and what we want for Instagram and Facebook to be these diverse places where people can see different viewpoints, a lot of the work we have done there has been through using our own channels. I mentioned the @instagram account previously. One of the individuals who we partnered with or who we showcased through that was Stephanie Yeboah, who is a plus-size model and also an excellent person to follow on Instagram if you fancy following someone who is full of interesting insights. We use our tools like that, for example.

We have done similar things around anti-bullying week. When it was anti-bullying week in the UK last year, we featured some content from a couple of influencers in the UK who were active in the visual difference movement as well, to showcase some more diversity there.

Lastly, I would also mention our offline or real-world partnerships. Those are really important ways that we can reach out to some of the campaigners and organisations who we know are already using Instagram to discuss these topics and give their campaigns a boost. I spoke a little about visual difference, because it is on my mind right now. I know you heard from Changing Faces, which is an organisation based here in the UK that we have worked with quite a lot. We worked with them on a campaign they ran on Instagram and Facebook to help raise awareness of the difficulties faced by people with visual difference. Similarly, we also asked them to come in and present their findings and the feelings and experiences of their community to some of the team at Facebook who work on the rules on what content is and is not allowed, to help understand that experience. It is a combination of things we do online and offline.

**Henry Turnbull:** As I was mentioning in the last answer, the public-facing side of Snapchat is a curated environment rather than necessarily an open environment for any kind of user-generated content that you can come across. That means we can exercise a little bit of control as to the entertainment that is shown there, whether that is produced by us directly or our partners or whether it is some of the user-generated content that is surfaced there as well.

We do work to promote content that promotes body positivity and diversity as well as addressing issues such as racial equality. I have already mentioned some of these examples, but, just to reiterate and maybe give a few others, some of the entertainment content that we have produced that will be surfaced to users in this section of the app includes "Beyond



## HOUSE OF COMMONS

Beauty” and “The Honeybeez of ASU”, shows that are dedicated to challenging traditional ideals of beauty.

We have also done quite a lot of work this year around content particularly focused on issues of racial injustice and diversity, in the US and elsewhere, including our flagship show, “While Black”, which focuses on what it means to be young and black in the US at this time. There is also the mental-health-related offering that I mentioned earlier.

The fact that it is that sort of curated environment on the public side of Snapchat means that we have quite a lot of leeway to develop interesting content that promotes positive messages and that we can ensure is being surfaced to our users.

**Q143 Kate Osborne:** Was there anything else you wanted to add to what you said before, Alexandra?

**Alexandra Evans:** I would just say that, like the other platforms, we use a combination of elevating and celebrating organic content via our users that will reflect the diversity of our platform while also generating from our own side some campaigns that will highlight those issues. For example, we would make a big deal of Pride Month. Our #imcomingout hashtag is probably the most successful hashtag we have had on the platform.

We are all taking a similar approach in terms of making sure that we are elevating and spotlighting diversity in a way that is organic and also giving it a push where we can.

**Q144 Kim Johnson:** Good afternoon, panel. My question is to Richard. Picking up the theme of algorithms and diversity, there have been reports of algorithm bias restricting the visibility of posts, in particular from black, plus-sized and disabled users. As you might be aware, Nyome-Nicholas Williams, a popular black plus-sized influencer, had her photos removed by Instagram. How are you working to protect minorities from this, Richard?

**Richard Earley:** I want to start by saying that it is absolutely never our intention that any community, race or individual would be discriminated against on our platform. That is not what we want our platform to do.

Having said that, clearly, as you have just brought out, there are still occasions when these kinds of things happen. To the specific case you mentioned around the hashtag #iwanttoseenyome, we do have policies or rules about multiple kinds of content that we do not allow on our platform. One of them is adult nudity. That is because we are a global community where people in different countries around the world have different expectations and standards around nudity.

When we write those policies, we make sure we consult with experts from various different parts of the world and communities too, but when we are enforcing them we use a combination of both human review—reports and humans reviewing content—and technology. This is advanced technology that can find images that look like they might break our rules so we can



## HOUSE OF COMMONS

remove them. Both of those types of enforcement can make mistakes, and that is what happened in this case.

Of course, we wanted to reach out to the particular community that was affected here. It is another one of those cases we have been talking about where it is an intersectional situation for black people and plus-sized people on the platform. We spoke to representatives and members who were active in the plus-sized community and we changed some of our enforcement rules in terms of how we enforce this policy.

This is a really good example of how we have more to do, both in terms of working with experts on researching and understanding what the right rules should be for platforms like Instagram or Facebook but also in terms of understanding what the impact of our own company might be on people, trying to interrogate ourselves, especially in this year where racial justice has been at the forefront, and understanding what impacts our platform might have in under-serving communities that are already underrepresented.

At Instagram, we set up a dedicated Instagram equity team, which is a special product team within Instagram that is dedicated to hearing and analysing examples like this one, looking at what the causes might be for these kinds of problems and finding solutions to them.

**Q145 Kim Johnson:** Can I ask about the work you are doing and your communications with disabled groups? Could you say a bit more about the equity team you have just mentioned and whether that team has representatives of the groups we have been talking about.

**Richard Earley:** I cannot speak to the membership of the team itself, but I would say there is absolutely a slight implicit statement in what you have said, which I fully agree with, which is that there is a diversity problem in the tech industry. We at Facebook and Instagram fully recognise that. We are taking steps within our own companies to try to address that through hiring practices, which I imagine will be quite familiar to the Committee members from other industries.

One thing it is important to recognise or that we really prioritise when we are working on these issues at Facebook and Instagram is that it is not the team members within Facebook and Instagram who are responsible and giving their expertise to the rules we have around what types of posts we do and do not allow. When we are writing those rules, we have a really extensive process where we look for reports or instances like this that suggest something might be wrong in how our rules are set. We then kick off a very detailed consultation process. We have a stakeholder engagement team that goes out all across the globe and tries to get views and advice from experts, academics, charities and community leaders on the issue that is at hand.

When we finally make a decision, we publish online the minutes of the meetings where we make these decisions to explain what different options



## HOUSE OF COMMONS

we had considered and the reasons why we decided to go for a certain option, and then we continue, as we roll out those new changes, to test them and to speak to communities all the time.

When I joined the company, I was really struck by how much work goes into this process of designing rules and consulting with experts. While we might build technology, we know we are not the experts on these issues, and we really need to listen to the individuals who do have expertise.

I will say one final thing on the equity team. I will just give a quick example of some of the work they have been involved in over the year or so since they have been founded. We have spoken quite a bit about content that might have a negative impact on mental health, but something I know is also of interest to the Committee is the question of bullying and hateful speech online. The equity team are involved in a new rule that we rolled out earlier this year, which is an expansion of our hate speech policies.

We heard from a lot of communities and lots of academics that, as well as the types of speech we do not allow currently as hate speech—attacks, derogatory terms, etc.—people are also starting to use negative or even what we cause harmful stereotypes to attack communities. There is a lot of academic research around this, which we tapped into. We came out with a new set of policies around banning certain hateful and harmful stereotypes. They include the stereotype that Jews rule the world, blackface as a stereotype for black people and also the stereotype that people in the Hindu cast of Dalits are manual labourers.

That is an example of one of those really nuanced, difficult policy questions that teams like the equity team will help us to continue to explore as the years go by.

**Q146 Kim Johnson:** Just in terms of that, then, there is this process by which images of nudity are deleted from your platform. Will hateful or harmful speech be taken down in the same way?

**Richard Earley:** Yes. The way it works normally when we launch a new policy like that is that we will start off with enforcing it by report. People will report content to us that they see that breaches the policies and we use that to surface examples of posts to our reviewers to confirm that they do break the rules we have set with those experts. As time goes by, we build up a database of what bad posts look like, and we use that database to train computers in spotting things that look similar to what has already been removed. Over time, those computers get better and better at finding these bad posts before anyone has even seen them.

In the area of hate speech, for example, we publish every three months a transparency report called the community standards enforcement report. It is quite a strange title, but that is what it is called. In there we give the details of how much of each type of content we have removed, but we also give details of what percentage of those posts that are removed our technology found before anybody else had to report it. We think that is a



## HOUSE OF COMMONS

really important place to invest. We are investing a lot of money in that technology, because we do not think it is right that the people who are affected by these kinds of negative comments have to be reporting them themselves.

When it comes to hate speech, about three years ago we were removing around 25% of the bad content through these technologies rather than people reporting them. As of the most recent report, which came out last month, that is now over 90%. Our intention is to keep getting better and better in all those different fields, including these new policies around harmful stereotypes.

**Q147 Kim Johnson:** There have been reports that people feel bombarded with social media content about changing their appearance, including weight gain content for men and diet and weight loss content for women. How do you respond to your users on this?

**Richard Earley:** The first thing I would say is that these questions around weight gain, weight loss and eating disorders are really complex questions. They are some of the most difficult ones we have to deal with at Facebook and Instagram. We want our platform to be a place where people can come and have these discussions safely and feel safe in talking about these issues. The rules we have, which I have talked a bit about, come into play when it comes to these topics.

The first set of rules I would mention is the set around advertising. I talked about these community standards, which are the policies that say what can and cannot be posted on our platforms by our users. For advertising, we have a higher set of standards that we require our advertisers to adhere to—the ad policies. These include a number of steps that are relevant here. We do not allow any advertisements, for example, that show “before” and “after” images of people to suggest a change in their appearance from a certain product. We do not allow any ads that attempt to make somebody feel bad about their image in order to make them buy a diet product. We also do not allow ads that have miraculous claims about incredible or unrealistic results from certain products. Lastly, when it comes to weight loss products themselves, we do not allow any advertisements for weight loss products to be targeted at under-18s. That is a snapshot of what we do on the advertising space.

As I have said before, a bit like we talked about the recommendations that we give, we recognise that these are things that people have not chosen to see. That is partly why we have these higher rules and it is also why every advertisement we show on Facebook is pre-reviewed before it is uploaded to try to make sure we catch anything that breaks those rules. Again, as we have said before, there will be mistakes here.

Lastly, separately from advertising, thinking about posts that our users put on the platform that have to do with eating disorders, I spoke about how we work really closely with experts around these difficult topics, and this is one of the most sensitive issues we deal with. We have worked very



## HOUSE OF COMMONS

closely with experts both here in the UK—this includes groups such as Beat, the eating disorders charity—and also internationally. We have an advisory board on these issues that has members from more than 20 countries around the world, who give us advice on what kinds of posts we should and should not allow. We do not allow any posts that promote eating disorders, but we do think it is important—the experts tell us that this is important—to leave space for people to be able to discuss these topics. A bit like the broader mental health issues we have spoken about before, the evidence suggests, and clinicians and doctors tell us, that talking about, expressing and admitting your feelings on social media can be a really important therapeutic outlet for people who are experiencing these kinds of thoughts.

That is a balance that we try to draw. It is very challenging, and we continue to work on this all the time. It is one that is incredibly valuable for the people who are experiencing the kinds of things we are talking about here.

**Alexandra Evans:** Your original question was about whether or not users feel bombarded with images that can make them feel not very adequate, frankly. That is the way I remember it from my own teenage years. I have to say that TikTok does well on that, because we are not, as a platform, a place where you are likely to be bombarded with content from our community that is talking about that aspiration or that perfect ideal. It is very much more likely, as I say, that you are going to find people dancing around their kitchen or celebrating the more normal aspects of life.

Richard was explaining a little bit about Facebook’s advertising policies and their content moderation policies. I have to say we are quite well aligned on those points. In terms of our own advertising policies, we are really clear that we need to make sure our policies are really tight. In September this year, we made the announcement that we had actually made some decisions around weight loss management tools. We took the decision to ban all fasting apps and all adverts for weight loss supplements. We have also taken the decision to age-restrict to 18-plus any adverts for weight management products at all. We have also put in some tighter restrictions on exaggerated claims. Richard was mentioning those “before and after” pictures, which have no place on TikTok anymore.

Something I am most proud of is that we have also taken some decisions to make sure any weight loss adverts are really clear that they cannot promote negative body image and, specifically, a negative relationship with food. Any advert with someone pinching their waist, putting measuring tape around it or any suggestion that ultra-skinny is the only option for you is just not allowed on our platform.

For example, someone might be pushing food away or there could be a tagline like, “Nothing tastes as good as skinny feels”. Those kinds of things are banned as well. We are really clear that our advertising policies needs to make sure we are enhancing people’s sense of body positivity rather



## HOUSE OF COMMONS

than being detrimental. We were delighted about the changes we made in September.

In relation to the content moderation, we have a very similar approach. We have absolutely zero tolerance for anything that is promoting, glamorising or even normalising eating disorders or unhealthy eating habits. Like Richard, we are trying to get to that point. We are really clear that we need to facilitate supportive conversations, but how does that look? What is a supportive conversation? What is enhancing somebody's recovery and what is potentially detrimental? These are the questions we are working through with experts at the moment.

In terms of enforcement, like Facebook we use a combination of automation and human moderation. We have over 10,000 moderators worldwide, and in our latest transparency report, which covers the first six months of this year, we reported that we removed just over 104 million pieces of content worldwide. To give you a sense of scale, that is just under 1% of all content that is posted on our platform.

We are really proud that 96.4% of that was removed proactively and 90% before anybody saw it. We are working at pace; we are changing and growing at pace. We are humble about the fact that we are not going to catch every incident of harmful content on our platform, but we think we have strong foundations.

**Henry Turnbull:** Your question was about people feeling bombarded by weight loss products. I would echo some of the points Richard and Alexandra made in terms of our own advertising policies, which are robust and which we moderate all ads on Snapchat against. We prohibit any ad for weight loss products like diet pills as well as any ads that could be described as body-shaming that contain exaggerated or unrealistic claims or that feature "before" and "after" images.

This is also an area where the design and build of apps is important. We do not offer that hyper-personalised approach to advertising. Users can opt in and out of categories that might affect the ads they get at any time. We have a really good balance of ads on Snapchat. I actually asked the team prior to joining this call to crunch a few numbers. We had over 1,700 advertisers on Snapchat who have run ads in the UK over the course of this year. Only 75 of those advertisers, so just over 4%, were for products relating to diet or cosmetic changes.

We have a good balance of ads and we have, as the other platforms have, strong ad policies that we moderate against to prevent that kind of situation.

Q148 **Bell Ribeiro-Addy:** All of the platforms we have represented here today feature filters, which have become a popular way to alter photographs and allow users to change their experience, whether it is removing blemishes, altering skin tone or slimming the face. According to the Girlguiding charity, half of young women aged between 11 and 21 regularly use these apps or



## HOUSE OF COMMONS

filters to make photos of themselves look better online. Some girls and young women will not post pictures without using a filter at all. We actually had a young witness with a lived experience of body dysmorphia who told the Committee that social media has become central to all of our realities, especially for young people. They are looking at these body images and saying, "Why do I not look like that?" Are you aware of the impact that appearance-based filters are having on your users? What are your thoughts on social media company having a moral responsibility to promote a sense of reality on their platforms?

**Alexandra Evans:** You are right that we have filters and effects on TikTok, but we do not have the filters and effects that you are describing around, again, narrowing the sense that somebody must choose this very focused and very stereotypical sense of beauty. Our filters are absolutely not about enhancing and touching up in that way.

All of our filters are created by our product team, but they are also reviewed by our trust and safety team. Anything that we think is going to be a detriment to the safety or wellbeing of our users, including around their sense of body image and in particular their weight, for example, would not get through our review process. It is important to flag that all of our filters are labelled as well. If you use a filter and you post a video and it has a filter on it, it very clearly says what filter you have used.

Our filters are trying to achieve something slightly different. I am a child safety expert. My constituents are young teenagers on our platform. It is so critical to their development. This is a time when they are changing rapidly emotionally and physically. It is so developmentally necessary for them to be exploring their sense of self and to get a sense that options are available to them and that all things are possible, frankly.

We are trying to use our filters and our effects to give people a toolbox to enable them to explore their sense of self and identity. If you look at our filters, I was using one last night that turned me into a spring onion, for example. There was another one that turned my daughter into a unicorn. These filters are playful, and they are designed to give you a sense of trying on identities in a healthy way.

Although we have filters and think really carefully about the impact of them, we think of ourselves more of a dressing-up box than we would a make-up box.

**Henry Turnbull:** Our aim on Snapchat is to try to ensure that anybody using Snapchat is finding it an inclusive experience that helps them express themselves and feel good about themselves rather than suggesting any kind of body or face type is superior to another.

For the benefit of the Committee, on Snapchat these are called lenses. Lenses are augmented-reality effects that you can add to the world around you, including to your face, and they are designed to make it fun to communicate with your friends using the camera. A really common element



## HOUSE OF COMMONS

of these features, as Alexandra was saying in relation to TikTok—it is the same on Snapchat—is an element of playfulness. On my Snapchat this morning, there was a lens that turned me into Father Christmas, for example. They are not designed to be hyper-realistic or to propagate an ideal or perfect image. Another common feature of all of these lenses is that they are all opt in. That means that lenses are always off by default. You have to click on one and decide to use it in order to apply that effect.

These lenses are either developed by Snapchat specifically—Snap ourselves—or they can be submitted by content creators and developers using our augmented-reality effects. Really importantly, all lenses are reviewed by our team prior to being surfaced in the Snapchat carousel. We reject any lenses that are designed, for example, to lighten skin tones.

We also recognise that language is important. We do not describe any of our proprietary Snapchat lenses or any effects that we offer to our creator community, as they design their own lenses, as beautification. Instead we use words like “make-up” or “retouching” to help developers reflect on how their lenses might make people look and feel.

We are also working with Google right now on bringing best practices to transparency in facial retouching lenses. We have found that a key part of this is ensuring that the user is in control of any filters or lenses they apply. Studies have shown that, if you are not aware that a camera or a photo app has applied a filter to your face, the photos can negatively impact mental wellbeing, because it is setting a de facto standard that people compare themselves against. On Snapchat, the default camera experience is always unaltered, and users have the option to use these creative lenses and effects. There is more that we can do. We want to build on this. Our ultimate aim is that the camera is always being used in a way that is positive and empowering for our community.

**Richard Earley:** Similar to what we have heard from the others, it is clear that this is a really new area. These sorts of effects, as we call them at Facebook, are a really rapidly developing technology. There is not a huge amount of research on these questions because it is so new. Henry mentioned some there, but there is a real need for a better understanding of how these kinds of new techniques that are emerging all the time will affect people’s wellbeing. That is one of the things I am keen for our research projects to investigate.

Similarly to the other platforms, our creators’ intention when they make filters is to try to create fantasy and surreal effects. We want to be very cautious, because this is such a new area. Again, a bit like I talked about with the advertisements, we have a higher set of rules that apply to anyone who wants to create a filter, and they are called our AR guidelines. Those include, for example, rules that you cannot create filters that promote cosmetic surgery. Importantly, again a bit like advertising, we always pre-review any of these filters before they are uploaded. A bit similar to what some of the others were saying, whenever you use a filter in an Instagram



## HOUSE OF COMMONS

story, there is a label at the top that tells you that the filter is being used and what the filter is.

As I mentioned, filters can take all kinds. They can be changing the background, changing your voice, also changing your appearance to a spring onion or something else. When it comes to filters that affect the face, we took the decision not to recommend any of those filters in the gallery of effects that opens up when you first look for effects on Instagram. That is another step we are taken to be cautious. We understand the effect of this.

Overall, it is really exciting. The creators who produced these effects are using them for incredible purposes. We have more than 400,000 individuals all across the world, in more than 190 countries, who are creating effects on Spark AR. We recently did some work and research to reach out to them. We found that more than 50% of them are women. It is an area of technology that is very interesting to us and one we want to keep researching.

**Q149 Bell Ribeiro-Addy:** You have described that the filters are used for fun and light-hearted purposes, and I can definitely see that in some of the content. I know that there have been some issues with your companies in the past. For example, Snapchat has used blackface and yellowface filters to make people's faces look for black or Asian. In particular, I recall the controversy over the Bob Marley face. There are chav filters to make users look more stereotypically working class. That has been on Instagram. There are chubby face filters on TikTok. I wanted to get your thoughts on this. Have any significant changes been made, given that a lot of people are likely not to see these types of filters as light-hearted and fun.

**Alexandra Evans:** We are all, as Richard said, on a bit of a learning curve on this one. I do not think today we would allow a feature that was described as something called chubby face. Our trust and safety team is really alert to the fact that these filters must always be a force for good. I take your point and absolutely, when we go forward, we want to make sure we are always leaning in to promoting that diversity and positivity around people's sense of themselves and their body image.

**Henry Turnbull:** I will address the point about the Bob Marley lens as an example of how our processes have changed. The Bob Marley lens was a lens that we ran more than four years ago, in 2016. That was actually developed in collaboration with the Bob Marley estate, so Bob Marley's family. Nevertheless, it was a really misguided lens and people rightly took offence at the time, four years ago. It is not available on Snapchat now. This type of lens would be rejected now under our current policies. We do not allow any lenses that would be considered offensive by a group of people or that could foster negative stereotypes. We will reject lenses that are developed by our user community, as well as anything produced by Snap. This was definitely a mistake. I would like to apologise to anybody who took offence. It was a really misguided lens, but it was more than four years ago, and we have certainly changed as a company since then.



**Richard Earley:** Again, my answer is very similar to the other two witnesses who have just spoken. I am not familiar with the chav lens you mentioned there. Without seeing it, I cannot say whether it would break one of our rules. All our regular community standards apply to filters, as they do to any other post or piece of content on Facebook. That includes not allowing things that are bullying or harassing and not allowing people to be cruel and insensitive towards others. That is our approach.

Even as we have got better at understanding what is and is not right in this space and got better at enforcing it, it is often the case that sometimes things get through our checks. That is why we always allow anyone to report any piece of content on our platforms as well, if they think it is in violation of our rules, and it will be looked at by a reviewer.

Q150 **Bell Ribeiro-Addy:** What proportion of the images or videos used on your platforms are edited? Do you think that young people using your platforms understand that a high level of the images they see have been edited? I cannot recall which company exactly—I think it is TikTok—that says they are labelled if they have been edited. It would be interesting to see what your views are on whether young people understand this and what the other companies do as well to ensure people understand that this is not a real image. It is probably best to start with Alexandra, because you have answered half of that.

**Alexandra Evans:** Because we are exclusively video, the possibility of creating some sort of perfect, hyper-idealised, airbrushed thing still is not there. Our filters are really obvious in themselves but, even if they were not, my experience of talking to young people is that they have a very sophisticated understanding of filters and are able to recognise them. On TikTok, I am pretty confident that there would be no confusion as to whether a filter had been applied.

**Henry Turnbull:** On Snapchat, it is usually pretty obvious, because the lenses we offer that alter your face or the world around you are not designed to be hyper-realistic. They are quite cartoonish, characters like Father Christmas, an alien or whatever. That tends to be the majority of the lenses we offer. They are not intended to have that hyper-realistic image. I do not have any figures on this, but I would venture that most people using Snapchat understand when an image has been altered using a lens.

I understand the proposal behind Dr Luke Evans MP's 10-minute rule Bill is to have some kind of logo or symbol on images or videos that have been digitally altered. That is something that has some merit and should be carefully thought through. We use this kind of approach in some ways already on Snapchat. We offered a baby filter this year, again not hyper-realistic, that transformed the user's face into a much younger person or a baby. In that lens, we added a little 3D rattle to the corner of the screen so that there was no confusion, even though again it was not hyper-realistic. The idea has some merit. You want to avoid overly nannying people and having huge disclaimers saying, "This has been an altered



image”, when in many cases it is very obvious, but something subtle is an idea to think about certainly.

**Richard Earley:** Similarly to what the others have said, there is a lot of work and understanding still to be done here to think about what is effective and what the intentions would be. We spoke about filters and effects before. As I mentioned, we have the little sign at the top that lets you know when someone is using a filter on an Instagram story. We do not do something like that in the rest of Instagram. Instagram started off very much as a photo-based platform.

While I have also spoken to Dr Luke Evans about his Bill, my understanding is that, if the intention is to think about the impact of filters on images on senses of body image, this is an idea that has been around for quite a long time. It predates social media by a long time and originally goes back to concerns around images in advertising and in the rest of the media. There has been a lot more research on this. The findings we have seen, which I have spoken to researchers about, are that it is not an effective way of addressing body image concerns.

On your last point about how much young people understand the filters and other kinds of effects they see, I do not have any specific research to share with you on that. Ofcom’s long-running “Making Sense of Media” reports talk a lot about young people’s use of technology. That reveals a really high level of understanding among young people about how this technology works. That is probably not surprising to those of us who are much older. Also, that sort of sense of how young people see and understand technology is borne out by the work we do at Instagram when we talk to young people about these things. Some of the charity partners we work with, like Childnet, often provide us with the opportunity to speak to young people in the UK about how they are using and understanding our apps. My sense has always been that their understanding is very high.

Q151 **Bell Ribeiro-Addy:** Following up directly to you, Richard, I know you talked about banning all filters that depict or promote cosmetic surgery. Could you go into how it works in practice? What is the difference between a filter that changes your appearance but does not encourage cosmetic surgery and one that does? What is the difference exactly?

**Richard Earley:** We brought in that policy to prevent filters that are promoting plastic surgery, as you said. Filters can take lots of different types. They do not have to be something to their face. They can be a sign. Any filter that gives instructions on plastic surgery would be covered by that. A better example for this conversation is filters where there might be the appearance of surgical lines on your face to indicate how plastic surgery might take place. That is the kind of filter that is against our rules now. We continue to allow for other filters that affect the face, but we do not include them in any of the parts of the app where we recommend filters to people.

Q152 **Bell Ribeiro-Addy:** Finally, would all of you support the introduction of a requirement to disclose where an image of a human body part has been



digitally altered in its proportions, so maybe a waist made smaller or something like that? How do you think that would affect your users?

**Richard Earley:** My understanding is that the research and the academics we have spoken to have said that that kind of labelling process is not actually effective in tackling body image. This is not just a topic that we see reflected on Instagram. This is a discussion about what bodies are and how bodies are presented. This is happening throughout society, partly supported by conversations on social media. It will be important to think about what the impact on other parts of the ecosystem would be—the traditional media and the ads industry as well.

**Henry Turnbull:** Lenses in Snapchat are either things you can add to the world around you, like buildings or landmarks, or they are aimed at your face. Body transformation lenses are not something we offer. Any kind of proposal, whether it is Dr Evans' proposal or a proposal around labelling proposed reduction in body types, merits some exploration, but it is difficult to give a firm yes or no answer in this session as to whether it is a good idea. This is the first time I have heard of this proposal specifically.

**Alexandra Evans:** I would second Henry and Richard's comments. We are always looking for clever ways to make sure we are highlighting ways that people have changed their images. We do this in advertising, for example. We take a slightly different approach in relation to advertising, which is simply that we will not have those kinds of adverts that might make those exaggerated claims or put people in a place where they feel they have to achieve a certain look in order to be successful or happy, with that kind of mentality. We are really keen to work with the wider stakeholders. We know from the Mental Health Foundation that the evidence was still to come in in relation to labelling. We would love to explore this idea further.

Q153 **Alex Davies-Jones:** Thank you all for joining us this afternoon in what has been a really enlightening session. You have all gone to great lengths to explain to us your safeguarding policies and how you have changed over the years to ensure standards are increased and protections are there for users of your platforms. Despite your safeguarding policies, your platforms—Richard, I am specifically thinking of Instagram here—are filled with “before” and “after” images and content promoting cosmetic procedures and eating disorders. I just know that, come 1 January, we are all going to be bombarded with posts of this type, telling us to lose the lockdown weight or lose the Christmas weight. The amount of content around this issue is going to be phenomenal. What is your response to this and what improvements are you making to ensure people are protected?

**Richard Earley:** Maybe I will talk a bit about our overall approach to safety and securing our users against that kind of content. It is certainly not our intention and we do not want Instagram to be a place where people encounter that kind of content. There are some really important nuances when you are discussing eating disorders, which I spoke a bit about before. The way we approach this in general is that we have policies that apply to our platform. We have tools that enable us to enforce those policies. Then



## HOUSE OF COMMONS

we have resources and partnerships off the platform, where we try to reach out beyond those who are affected.

I have spoken quite a bit about our policies. The point I would want to raise here again is that it is very much a case of us being led by the experts when it comes to something like, for example, bullying content. We work really closely with charities that are involved with young people. I have mentioned the Diana Award, Childnet, some of our partners here in the UK. Bullying in particular is a very challenging topic. Among all the harms we have to protect people against, bullying is one where the definition is often subjective by individual. When it comes to removing bullying content, we often have to rely more on who is reporting the content or who the content is targeted at. That is why we are less good at removing it proactively than we are for posts like hate speech, which I talked about previously.

Once we have those rules, it is not enough just to have the rules in place. We also need to have ways to enforce them. I have spoken about the technology we use, which is a focus of terrific investment here. Our team at Facebook that works on safety and security is more than 35,000 people. About half of them are directly reviewing content. Any piece of content on Instagram or Facebook can be reported by our users. Because we see the way people use social media changing and developing so much, that human review and ability to spot new types of issues that are breaking our rules, or trying to cause harm in ways that get around our rules, will always be really essential.

The last part of that is making sure we partner off-platform with real-world organisations to help them understand how this works. I have spoken a bit about the Diana Award and Childnet's digital ambassadors programme. You spoke quite a bit about eating disorder and self-image content. There is a real value and a really important role for all of society here in helping particularly young people understand and digest the content they see, not just on social media but in the traditional media. That is why I mentioned that we have worked with Media Smart, which I know is a partner of a number of other companies, to promote its module around eating disorders.

All that is not to say that we have this solved. I fully agree with you and accept that this kind of content appears on our platforms. We want to get better at removing it. There is a very specific piece that I have already spoken about around eating disorder content, which I can talk a bit more about maybe a bit later. The last thing I would say would be that we want our platform to be a space where people talk about these issues and find resolution for them as well. We have seen some really amazing attempts by our users to do just that.

One of the fastest-growing types of group on Facebook is parenting groups. We know that parents in parenting groups are naturally very concerned about their children, their body image and their thoughts about their own bodies. We have relationships with some of the admins, so the people who



run the largest groups on Facebook, including some really excellent parenting groups, such as Parenting Mental Health and Dadsnet. Suzanne from Parenting Mental Health has been an amazing and really inspirational person for us to work with.

We partnered just this year with Dove, which I know you heard from previously. It has some fantastic self-esteem modules. We arranged for Dove's resources to be used to help parents in these Facebook groups, some of the largest parenting communities in the UK, ask questions, understand how to talk to their children about issues around body image. Those admins were then able to talk to the rest of their groups and hopefully reach out to more children.

I fully accept that social media has a role to play and we need to do more to make sure we are tackling this kind of harmful content where it appears, always making sure we protect those who are experiencing those feelings themselves. There is also a lot we can do to help.

**Q154 Alex Davies-Jones:** I am glad to hear that, but I am also very concerned about the moderators themselves. They are people too. It is not all down to computers, as you said. You said you employ nearly 35,000 people, was it, in this role? These moderators, these people doing this role, are constantly seeing some of most horrific content created and having to check and balance what is and is not appropriate. What safeguards do you have to put in place to protect your staff in this area? I can imagine that role must be horrific.

**Richard Earley:** It is a really great point. You are absolutely right that these are some of the people with the hardest jobs of all at Facebook. We really value and respect the work they do. I said there are 35,000 people working on safety and security in total and about half of them are actively reviewing content.

We work with internal Facebook employees and very close outsourced partners who staff these centres. Whenever someone joins one of our content review teams, they go through a really detailed onboarding process. That of course includes training on how the policies work, understanding the nuances of them and the ones they will be responsible for. Also, a significant part of that is about helping them prepare and, for those who are going to be looking at the most difficult content, prepare for those experiences. All our reviewers have access to psychological help if ever they need to. There are also breaktimes built in for them. There are not any, for example, targets for how many pieces of content people have to look through.

Having said all that, you are absolutely right that we know that those people who are dedicated to looking at the most harmful and worrying content are exposed to some tremendous pressures. We are committed to making sure we help and support them where we can.

**Q155 Alex Davies-Jones:** Good. I am glad to hear that. Henry and Alexandra,



## HOUSE OF COMMONS

I will come to you both now. You need to be 13 years old to access all of your social media platforms, but we have received evidence that thousands of children under 13 have access to your platforms. I think we are all aware that those under 13 use them. As you said, Alexandra, to quote you, they are attracted to access that dressing-up box of filters that you described, and that imaginary play that they use it for. They are also then exposed to some content that is wholly inappropriate. What are you doing to stop this?

**Alexandra Evans:** TikTok is a 13-plus app. That is something we are really clear about and we enforce. We enforce it in two key ways. First, nobody can join and sign up to our platform without going through a registration process. Part of the registration process is that you must make a declaration about your age. We are really clear that we are applying best practice on that. We are not, for example, saying, "By the way, you have to be 13. Can you please confirm you are 13?" We just say, "Please enter your date of birth", usually presented without any nudges. If the applicant told us they are under 13, we eject them from the registration process, and they cannot try again. They are blocked from trying again.

We also have given our app a 12-plus rating in the app store, which enables parents to activate the restrictions to ensure that, when they give a phone or a tablet to a child, they can simply lock and prevent them from downloading the app in the first place.

Of course, it is not just about the registration process. It is also about how we enforce those strategies and our rules on-platform as well. We do that in three ways. The first is that, if a parent or guardian messages or reports to us that their child is on our platform underage, we immediately block the account. We are also encouraging all of our users to report any underage account. If they do so, it will get referred for moderation under our underage policy. Finally, we have over 10,000 moderators worldwide. All those, as well as carrying out their very difficult day job, are also required to think carefully about whether an account might be potentially being managed or used by an underage user. At that point, it gets referred for moderation as well, under our underage moderation policy, and will be blocked.

**Henry Turnbull:** I want to be really clear up front: we do not want under-13s using Snapchat. If we find that anybody is using Snapchat who is under the age of 13, as Alexandra was saying, we will delete that user's account. There are also other measures we can take, like blocking their device. The way that it works is that, to set up a Snapchat account, a user needs to enter their date of birth. If they enter a date of birth that is under the age of 13, they will not be allowed to create an account. We do not say, "It is because the date of birth you entered is younger than 13". Somebody could potentially infer at a later date that the reason they are getting knocked back is because the age they have entered is below 13 and they could try a different age; I totally accept that.

There are a lot of challenges around alternative measures. This is something we are trying to work out now with Government and other



## HOUSE OF COMMONS

agencies. ID-based age verification is one potential answer, but it requires the collection and retention of things like passport, driver's licence or other types of ID. The Information Commissioner's Office here has highlighted some risk with that. I know there is new technology in development, but that is unproven in terms of its accuracy and scale. There are possible solutions, thinking first in the short term, and then looking a bit further ahead, which I can expand on very briefly here.

In the short term, there are existing pinch points where we could have impact faster than asking every app and website that exists to develop their own solutions. Going through the Apple App Store or the Google app store is a pinch point for all users who are looking to install apps on their phones. Introducing some kind of age gate on sign-up to the app store, or maybe upon purchasing a new phone, is a simple process that could be an effective and scalable tool to ensure children are only accessing any apps that are age-appropriate. That is a short-term sticking plaster.

Looking long term, the key is to find a solution that works across different platforms and that does not compromise on the security or privacy of individual users. Also, really importantly, it must be an approach that works internationally. I think the Committee will recognise that, if we opt for a UK-specific approach, young people are savvy enough to work out how to use a VPN and circumvent those measures. It is important that the solution works internationally as well. We are working with the Government here. We are committed to working with Governments and multilateral organisations to find a solution, because I do not think there is an easy answer, unfortunately.

**Q156 Alex Davies-Jones:** Briefly, I would like to ask you all whether you think there is any difference in the content viewable on your platforms for a 13-year-old and a 17-year-old. Do you think that 13 years old is an appropriate age for children to begin using your apps?

**Richard Earley:** Like the other companies, we are a platform that can be used by people from 13 and up. Henry and Alexandra have just spoken at length about the challenges there. I do not deny any of those challenges and we face the same challenges. We require that people provide their age when they sign up and we use that to change the experience for people from 13 to 18. If you are under 18 on Facebook or Instagram, you have a different experience.

There are a couple of different types of changes that we provide to people who are under 18. Maybe I can send a list of them, because it is quite a long list. For example, there is of course the difference in advertising that I have mentioned before. There are also things like, on Facebook, we do not allow under-18s to be directly contacted or messaged by an adult who is not connected to them by somebody else. We also have some of the restrictions on things like certain types of sensitive content that we allow on the platform, for example violent content or content that is talking about global issues that might contain violence. We prevent people under 18 from



## HOUSE OF COMMONS

seeing that. There is a range of different ways we try to make that difference.

**Alex Davies-Jones:** The Committee would appreciate it if you could send that list over.

**Alexandra Evans:** Like Richard, we think very carefully about the user experience of those aged 13 to 17. We think about the developmental vulnerabilities and how we might mitigate them through the design of our service. In relation to harmful content, today we are talking about eating disorders and body image, and we think those issues apply to all our users. In our community guidelines, one of the restrictions is around glorifying, promoting or normalising eating disorders. That is an example of the content that would apply to all our users. We think that is the right approach.

Q157 **Alex Davies-Jones:** Henry before I come to you, on Snapchat specifically, I have had some experience of this personally with my own stepchildren. When they were younger, early teens, they were bullied because, as you say, the messages disappear instantly. It is that easy way out for people who are bullied. Do you think it is appropriate that a 13-year-old be using your platform? Does the experience differ from, say, a 17-year-old?

**Henry Turnbull:** I absolutely think it is appropriate for a 13-year-old to be using Snapchat. I think I mentioned that the public-facing element of Snapchat is a curated and moderated environment. That means that all the content there has to abide by our content and community guidelines. That means we can ensure that all the content that is surfaced there is not harmful, is not inappropriate and meets those standards of being able to be shown to a 13-year-old.

In terms of the private side of the app, you have highlighted ephemeral messaging. I have seen suggestions that ephemeral messaging, disappearing messages, can encourage bullying. It is a bit complex, but there are also elements of disappearing messages that are much safer when it comes to bullying. You cannot forward a message on Snapchat. If a message disappears, it cannot be seen by a large number of people, like instigating a pile-on. That message is not there forever.

I want to correct the impression that there is nothing we can do about bullying on Snapchat because messages are ephemeral. That is not the case. I would urge anybody who is being bullied on Snapchat to report that user and report the snap they have received. Our trust and safety team can see snaps that are reported and can take action. It is a bit more complex than saying it directly encourages bullying.

**Alex Davies-Jones:** I am glad to hear that. Maybe we should make people more aware of that policy, because I was not personally aware of it. Maybe more work needs to be done to communicate that to people, particularly younger users of your app.



**Henry Turnbull:** Education is really important around reporting, because a lot of people think their report is not anonymous; it is. A lot of people think nothing will happen to their report; it will. We are looking at things like how we get that information to people in more creative ways. We are launching our own dedicated safety channel in "Discover", which is a bit more Snapchatty and engaging but has these kinds of messages around reporting safety practices. It is something we are thinking about, because I agree that reporting among younger people is not as prevalent as it should be.

Q158 **Alex Davies-Jones:** That brings me on perfectly to my final question to you all. I mentioned education and you have mentioned education, with the need to speak to the users of these platforms about the options available to them, the guidelines and the guidance. Whose responsibility is it to educate these young people on body image pressures and the issues of bullying online? Where does the buck stop?

**Alexandra Evans:** I thought that the Committee's research that showed that 78% of young people wanted more information on body image was a really important finding. Absolutely, that responsibility is a collective one. There is a role for the classroom in relation to that. There is also a role for platforms like ours. Of course we have digital literacy resources. We have a safety centre and we have safety videos, because we know that is how kids like to receive their information.

Also, we want to make sure we are role-modelling good behaviour in relation to body image. I have mentioned this before. Children, even teens, are learning and using play and creativity as an option for self-expression and a sense of it being okay to be who they are, whatever that is and whatever that means to them. We want to make sure that, through things like our filters, we are positively broadening their horizons and giving them a sense of opportunity, rather than limiting that sense of opportunity. Equally, we want to make sure that, as a platform, we are role-modelling good behaviour in terms of showing that we must always not just protect vulnerable people but spotlight them, celebrate them and champion them on our platform. That is something that TikTok does really well.

**Richard Earley:** Very similar to Alexandra, I think it is a shared responsibility. We have been thinking about this very seriously. We have been doing a lot through our platform to help young people understand how social media works, how the news they see works, for example, with things like our Digital Literacy Library. We also have a lot of partnerships currently in the UK. I have mentioned Media Smart before. Another one that is really interesting to mention on a broader topic is the work we do with the Economist Educational Foundation, supporting their Burnet News Club. That is a resource that can be given to teachers to help them run after-school clubs, to think about media literacy.

It is very much a shared topic. I have spoken a bit about the work we do with parents as well. There are a lot of young people on Instagram. There are also a lot of parents on Facebook, so we have tried to find ways to



## HOUSE OF COMMONS

bring them together. We ran a programme this year called Your Digital Family, which we designed with Parent Zone and The Mix, to bring together young people, families and parents to talk about tech and device use and break down those barriers and miscommunications that often exist between people of different ages. There is a lot we have been doing.

I am also really heartened by the focus in the Government's online harms White Paper around the Government's digital media literacy strategy. That is a great opportunity for the Government to bring together all the stakeholders here that we spoke about—parents, schools, social media platforms, et cetera—to think about what is most effective.

**Henry Turnbull:** I agree that we all have a role to play and platforms absolutely have a role to play. Similarly, we have a range of resources, through our safety centre and our privacy centre. I mentioned some of the more creative thinking we are doing around surfacing those resources to users as well.

Charities play a really important role. We work really closely with charities. I know Childnet has been mentioned today. South West Grid for Learning has been mentioned, which does an excellent job educating young people and parents about the risk of online platforms.

Platforms cannot do it all themselves. There is a role for parents. There is a role for schools and the Government. I am equally pleased that it is addressed in the latest online harms White Paper document. There is a need to educate about being safe but also about being a responsible citizen and a good person online. That is something that has not necessarily been addressed as much as it could be. There is plenty of work for us all to do there.

Q159 **Angela Crawley:** Can I first come back to Richard on the point you made earlier about the responsibility to consider the Government's announcement of the online harms Bill? Ultimately, the focus of that has been on the duty of care. The NSPCC has published its six tests for what it feels constitutes a sufficient bar for that duty of care. Would you support those tests it has published, or would Facebook consider going further than that to ensure the duty of care is more than what the legislation requires?

**Richard Earley:** At Facebook and Instagram, we have been very vocal in our belief that more regulation in these topics is welcome. We think that Governments can play a really valuable role in setting the expectations for companies, Governments themselves and regulators around protecting people from content online.

I am not familiar with the six tests the NSPCC mentioned, but even the publication yesterday of the Government's final response leaves a lot of questions to be answered around how the framework will work. The principle behind the model the Government are proposing, which is holding platforms to account for their responsibilities to protect their users from harms and requiring transparency from them to do that, is one we fully



support. Particularly on the transparency side, Facebook is a world leader in the information we provide about how well or badly we are doing enforcing our rules in different places. We are really keen to keep working with the Government on that.

**Henry Turnbull:** I am afraid that I am also not familiar with the six tests that the NSPCC has applied. I can talk a little bit about our engagement with the Government and what we consider to be good principles for regulation if that is helpful. We support the principles behind the online harms White Paper and have been in constructive dialogue with the Government for a long time now about how you produce effective regulation that improves user safety but is also proportionate and practical for the huge variety of different platforms and online services that exist. This is an area where a one-size-fits-all approach is not going to work.

I should say that I have not had a chance to fully read the 100-page document, so I am not going to try to summarise that here. Up until now we have supported the Government strategy of principles-based regulation based on a statutory duty of care. For regulation to be effective, it should set the overall outcomes that platforms should deliver in respect to user safety without being overly prescriptive on the methods, tools or tech they should deploy, just because there is such an enormous variety of online platforms on the internet.

Everything is rapidly evolving. Even the three platforms here today are so different. Given that enormous variety, given that many companies are much smaller than some of the largest players, certain solutions may not be practical, relevant or appropriate for all services. It is about focusing in on the safety outcome, the safety objective you want to deliver and then allowing platforms latitude to deliver that in the way that is most appropriate for their services. That is the kind of approach the ICO has taken with its age-appropriate design code, for example.

Lastly, it is really important that regulation is independent from Government and insulated a bit from the political whims of the day. We very much support the proposed role for Ofcom as a credible, trusted regulator in this space.

Q160 **Angela Crawley:** I would agree. Alexandra, I will come to you in a second. I am going to slightly move the conversation forward, but please feel free to answer that question as well. Earlier on, you have each touched on the advertising policies your companies have at this point in time in regards to protecting users from body image pressures. I wanted to ask you specifically about the policy protections that each of you have put in place. Specifically, in our body image survey, we heard that targeted ads on social media hugely contributed to body dissatisfaction, with men in particular getting ads to build muscle, or ads encouraging post-partum women to bounce back, to name a few examples. Alexandra, how can you ensure the targeted ads do not focus too heavily on the appearance issues, given the detrimental impacts on mental health of the users of TikTok?



**Alexandra Evans:** The first thing to say is that our ads are only personalised if the user opts into personalised adverts. That would be one way of avoiding that risk. The other thing I would say is that we take an upstream approach to that. Rather than saying, “We are going to disrupt your problematic advertising targeting model”, we are making sure those adverts are not allowed on our platform in the first instance. With the scenarios you described, that bounce-back moment after pregnancy was a time for me personally when I felt extremely vulnerable. Those kinds of adverts suggest that there is a moment when you have to move towards ideal and perfect again and that it is essential to your wellbeing or sense of beauty or whatever it may be. They would not be allowed on TikTok. My answer to your question is that personalised targeting adverts should be something that any user should be allowed to opt in or out of. It is really important that those adverts do not find a home on the platform.

Q161 **Angela Crawley:** What are your thoughts specifically on the question regarding duty of care and whether TikTok will go further than the duty of care that the legislation may well outline?

**Alexandra Evans:** I also, like Henry, have not managed to fully digest the online harms White Paper. I am a child safety expert by trade. I worked at the BBFC as a policy director, so I know what it means to be a regulator in this space. I then moved on to work for an NGO, where I advocated very vociferously for greater transparency and accountability for platforms. From my perspective, the online harms White Paper’s publication yesterday was a landmark moment that we really welcome at TikTok. We think that it will bring huge clarity. There is a real opportunity for us all to get together to work out what the standards are and how we want the digital environment to look and work for our children in particular.

I would like to second Henry’s comments around Ofcom. We think Ofcom is a really experienced and well-placed regulator. We are really pleased to hear that they will be carrying out this critical function.

Q162 **Angela Crawley:** Can I turn that same question regarding body image and the use of targeted adverts, for example to men to build muscle or to women to bounce back post-partum, to Richard?

**Richard Earley:** I talked about the rules we have. We have our advertising policies that are higher than the regular rules for what our users post on the platform—I will talk about those in a second. Also, it is worth pointing out that it is a requirement of our advertising policies that people abide by the ASA’s code of conduct for online advertising, the CAP code. One of the real benefits of the advertising industry in the UK is that it has this very long history of the self-regulatory advertising system. The ASA has looked into many of these issues in detail and taken a lot of expert advice on how to ensure advertising is safe and trustworthy for the people in the UK. We incorporate that value into our own policies, too.

For the specific questions you spoke about, I will raise a few parts of our ad policies that I mentioned previously. We do not allow ads that give



## HOUSE OF COMMONS

“before” and “after” images of what the impact of a certain treatment would be. We do not allow adverts that try to generate negative self-comparisons, so make people feel bad about themselves in order to sell diet products. We also do not allow any ads that make misleading, highly inaccurate or unrealistic claims. Lastly, when it comes to the world of broader weight loss or cosmetic surgery adverts, we do not allow any of those to be shown to under-18s as well. That is the rule system. I spoke a bit before about how, for advertisements, we require adverts to be reviewed before they go on to our platform to make sure they comply with these codes.

In terms of the work we do on this, just like with our policies for what our users post, we are also looking at how people change and try to adapt their messaging to sometimes, if there are bad actors, get around these rules. We are often consulting with the ASA, speaking to the ASA and the experts they bring together about this. As I have said throughout this, I do not want to pretend that this is a perfectly functional system. We know that there are errors that happen, human and mechanical errors that allow things to get through. That is why we have the reporting function that allows people to report ads they feel are misleading. We encourage people to do that.

Q163 **Angela Crawley:** To add to that, we found that, over the last year, 86% of adults had seen adverts for weight loss organisations and 50% had seen adverts for cosmetic surgery. Ultimately, it is a problem that has to be addressed. I am conscious of time, so I will move on to specifically the questions around the Advertising Standards Authority. Alexandra, Henry and Richard, you have all referred to wanting to work with Ofcom and others to ensure you comply with the new legislation that is coming into place. A huge number of the adverts on social media come from influencers. How do you monitor all this and ensure they do not contribute to the appearance pressures?

Can I add the second question to that? The Advertising Standards Authority told the Committee that in the new year it will be undertaking work around advertising and body image. Can you commit to working with the Advertising Standards Authority on this issue to tackle some of the concerns we have raised today?

**Alexandra Evans:** All of our influencers are beholden to the standards we have mentioned that the ASA oversees and are required to label their adverts. They typically do so by using the hashtag #ad on our platform. You asked specifically about the work the ASA will be carrying out in the new year. Yes, of course we are looking forward to working with them on that.

**Angela Crawley:** That is great. Thank you very much for that commitment.

**Henry Turnbull:** In response to the second question, absolutely. We already work with the ASA and look forward to working with them. It was interesting to hear about that work in the recent evidence session.



## HOUSE OF COMMONS

In relation to influencers, historically, Snap as a platform is less geared towards influencer content. The core of the app is about communicating with your close friends, rather than following people you do not know. I think I mentioned that the way public content works on Snapchat is that curated environment. We are able to ensure a bit more diversity of content in those areas of the app because of that element of curation. Obviously we have popular accounts on Snapchat. All Snapchat accounts are required to comply with our community guidelines and terms of service.

Any kind of paid promotion of products on Snap by anybody, whether that is a company or an influencer, is required to comply with our advertising policies. Among other things, they require that ads are really clearly identified as such and prohibit some of the more harmful content that we were discussing earlier. We would certainly apply those policies, regardless of whether it is a company or an individual, even though we are less of an influencer-friendly platform than some.

Q164 **Angela Crawley:** I appreciate the points. Thank you, Henry, for making that commitment to work with the ASA in the new year on body image. Richard, could I come to you? I am conscious of time, so could we try to keep the answers succinct so we can move on to the next set of questions?

**Richard Earley:** Yes, I will be very succinct. Instagram has been one of the leading platforms where the creator and branded content movement started. We think it is really important that we recognise this is a very new space. There is a lot of work ongoing in regulatory authorities around the world about how to make sure this is done safely. We want to make sure we do that in a way that enables the creators on Instagram, who are often small business owners or entrepreneurs starting off a small business of their own, to be able to make the most of the tools we give them.

I know the ASA has published its five-year strategy, which commits it to working much more closely with online platforms to protect users from any irresponsible advertising there. We are absolutely committed to working with them on that. Because of us being a slightly larger platform, we have gone down this road a bit further than many others. Over the course of last year, the CMA and us reached some agreements about how we will do more to add transparency to the way paid content is produced and enabled. A bit similar to what Alexandra mentioned, we have an "in paid partnership with" disclaimer that people can add to their posts if they are promoting something they have been remunerated for. We have opened that up so that anyone on Instagram can use it. We have also made very clear in our terms of service that, as the ASA says, it is the responsibility of the creators to ensure they are abiding by the CAP code when they are advertising like that.

Lastly, something that is really important is helping people understand how these rules work, because it is quite complicated. Oftentimes, people are getting involved in marketing who were not really in that space before. We are working with Media Smart, again, which is actually convening young people to look at the rules we have in place around influencer advertising



## HOUSE OF COMMONS

and to express those in a way young people can understand, so that people who are not used to dealing with advertising regulation can make sure they comply and keep people safe.

**Q165 Peter Gibson:** I am acutely conscious of time. I am going to try to abridge my questions into one if I can. As part of the online harms legislation, the Government will place a statutory duty of care on social media platforms to protect users. What is your response to this? How will you prepare for it?

**Richard Earley:** I said a while ago that we have been calling for this kind of regulation for a very long time. We think it is a very valuable intervention. We were glad to see the publication yesterday of the final response. The principles within the framework are ones we support, the idea of holding tech companies to account for the systems they have in place to protect people from different harms. We share the views that have been expressed before about the value of Ofcom being appointed. Similarly, there is a lot of detail to come, both in the Bill and elsewhere. We are really positive about this. While there are, naturally, some parts we have views on, we look forward to expressing them as the Bill goes through Parliament.

**Alexandra Evans:** Just to repeat, we are really pleased to see that the White Paper has been published. We are looking forward to working with Government and stakeholders in Parliament. We will also have views as the legislation passes. We are really comfortable with the fact that legislation is part of the world we live in. We already have legislation that covers privacy rights. We know that there is also European legislation in relation to harmful content. We think that regulation plays a really important role in making sure the digital environment is a place that our kids can feel really safe and not just feel safe but thrive. We are looking forward to digesting the Bill and the White Paper before that and to working with Ofcom to work out how we can collaborate to enhance the safety of our digital ecosystem.

**Henry Turnbull:** We very much support the Government's strategy of principles-based regulation based on an overall statutory duty of care, notwithstanding not having read the full response published yesterday. In terms of what we are going to do to prepare, we already work really closely with the Government. We already work really closely with Ofcom to explain our safety approach but also to understand any requirements coming down the line. There is always more that we can do, but, in terms of the safe-by-design nature of the app and the really effective team we have working on these issues, we are in a good position for compliance, whatever that requirement looks like. I look forward to working with the Government on the requirements as they evolve.

**Q166 Theo Clarke:** How will companies comply with the new online harms regulatory framework relating to content that promotes dangerous and negative views on body image and in particular for content that can be accessed by children?



**Henry Turnbull:** As I understand it, the Government's position is less about identifying a finite or limited list of harms, each with their own separate code of practice. That idea was never really going to be viable for smaller companies. It is more about looking at the systems and processes that platforms have in place and looking at their overall efforts to ensure the safety of their users. There is nothing to stop a regulator looking at a platform, determining if they have a systemic issue with harmful content related to body image and requiring remedial action. I do not think you necessarily need those individual codes of practice.

In terms of how we comply, ensuring user safety is never done, but the way Snapchat is built makes it really hard to spread this kind of content. We have a team that can review this sort of thing when it occurs very quickly. We are already in a good place to comply, but obviously are going to work closely with the Government as they develop and with Ofcom.

**Richard Earley:** I do not have a huge amount to add there. We are in a similar position. There is a lot more detail in that document, which we are pleased to see. There is still lots that will be left for either the Bill itself or for secondary legislation to be introduced under the Bill, and ultimately for Ofcom itself to develop as it takes forward whatever form of code of practice it is required to do for different companies. We expect the regulation to apply to us.

What is very valuable about the enforcement framework and the way the responsibilities are framed is the role of Ofcom. It seems that the regulator's role will be to fully understand the systems, as Henry just mentioned, that are used by companies to help keep people safe. It will have the power to request information, to understand fully why it is that we take certain decisions. We have spoken quite a bit about some of those very complicated issues where we have to take decisions about what content should be left up and removed. We have worked with experts for this so far, but Ofcom will be a really valuable additional pair of eyes there, and provide reassurance to the Government and the public as well. There is a lot to be learnt about it yet, but I think it is going to be a very valuable process.

Q167 **Theo Clarke:** Alexandra, before I get you to answer finally, I have one quick question for everyone, just as a yes/no answer. The legislation will set out that online content should be considered harmful where it gives rise to the risk of significant physical or psychological impact on individuals. My quick question is if you accept that body image pressures fit this description and should be a harm. Alexandra, would that be a yes or a no from you?

**Alexandra Evans:** I know you want a yes or a no, but in relation to body image it is never quite that simple, is it? We need to be really careful about how we are classifying types of content. Harmful content for us on our platform is manifesting in relation to body image and eating disorders in relation to glorifying, normalising or promoting eating disorders. In relation to body image, that is a wider piece. Negative body image is something we are working hard to tackle, but the concept of body impact has many



## HOUSE OF COMMONS

aspects, some of which can be positive as well. I would be a little bit cautious at this very early stage of classifying body image as being inherently considered harmful content.

**Q168 Theo Clarke:** I am conscious we have one minute left. Richard, would that be a yes or a no?

**Richard Earley:** I also cannot give you a yes or a no, because I have not studied that language very carefully. We are guided by the experts here and they encourage us to try to separate out questions of body image from wellbeing and mental health. How those different types of harm and content manifest is something we need to consider carefully. I am sure Ofcom will do the same.

**Henry Turnbull:** I agree. It is about breaking it down to its individual components. There are elements of quite a broad subject, whether it is eating-disorder-related content or self-harm, which are really evidently harms and we should all act on, or some stuff that is a bit more nuanced. We need to explore that in a bit more detail.

**Chair:** Can I take this opportunity to thank all our witnesses for their evidence this afternoon? It has been incredibly helpful and informative. That concludes our meeting, so thank you very much and goodbye.