

### Behind the screen:

The reality of age assurance and social media access for young Australians

Transparency report





#### **Table of contents**

Commissioner's foreword	5
Introduction	9
Purpose of this report	9
Our approach	10
The state of play: children under 13 are accessing social media	11
Why this matters: The real-world impact on children's online safety	13
A path forward: encouraging uplift and consistency	14
Key findings	16
Methodology	24
Insights from the Children and Social Media Survey	24
Insights from information requests under the Basic Online Safety Expectations	25
How to read this report	26
How many Australian children are using social media?	27
What did children say about using social media?	29
What did social media services report?	33
What does this information tell us?	36
What tools and technologies were being used by social media services to assess the age of	
users?     What did social media services report?	
What does this information tell us?	
What steps did services take when they found users who may have been under 13?	
What did social media services report?	
What does this information tell us?	
Did the services undertake any research to develop or implement age assessment tools?	
What did social media services report?	
What does this information tell us?	49
Did the services undertake any research to estimate the number of underage users?	
What did social media services report?	
What did children say?	
What does this information tell us?	52
How were children accessing social media services?	52
What did children say?	53

What does this information tell us?	56
What was revealed about parental consent?	57
What did services report?	57
What did children say?	
What does this information tell us?	64
How easy was it to report an under-13 user?	65
What did social media services report?	65
What does this information tell us?	69
How many users under 13 were reported or flagged and how long did it take services to respond?	71
How many reports of potential under-13 users were made to services?	
What does this information tell us?	
Actions taken in relation to under-13 users	
Which tool or indicator led to the majority of suspensions or bans of underage users?	
What was done to prevent banned underage users from re-registering on services?	
What does this information tell us?	78
Additional information provided by the social media services	
Discord	79
Facebook	80
Instagram	82
Reddit	84
Snapchat	86
TikTok	90
Twitch	96
VouTube	96

### **Glossary**

3

Term	Definition		
age assurance	Age assurance is an umbrella term which includes both age verification (determining a person's age to a high level of accuracy, such as through the use of identity documents) and age estimation (providing an approximate age, for example through the use of facial or voice analysis, or analysing certain signals to infer an age or age range).		
age gate	Where a site or service asks a user to enter their birthdate or confirm their age.		
artificial intelligence (AI)	Artificial intelligence (AI) refers to an engineered system that generates predictive outputs such as content, forecasts, recommendations, or decisions for a given set of human-defined objectives or parameters without explicit programming. AI systems are designed to operate with varying levels of automation.		
end-user	A person who uses an online service. This term is used interchangeably with 'user' throughout this report.		
facial age estimation	Technology that uses machine learning models to estimate a person's age based on their facial proportions and characteristics.		
Information Requests	Written requests for information given under section 20 of the Online Safety (Basic Online Safety Expectations) Determination 2022.		
language analysis technology	Technology that uses artificial intelligence to assign a probability that text or conversations indicate that a user is of a certain age.		
machine learning	The patterns derived from training data using machine learning algorithms, which can be applied to new data for prediction or decision-making purposes.		
parental consent	For the purposes of this report, eSafety defined parental consent as when an adult, generally one who is age-assessed by a service, provides confirmation that a child is of a certain age. Parental consent could be sought at various points in time – for example, at sign-up; when an account is flagged as being underage, or following an account suspension/ban.		
privacy, safety and/or security settings	These are terms used by services to describe the various settings they provide to users, including specific settings for child users. Throughout this report we have relied on service's own descriptions of any privacy, safety and/or security settings for child users.		
neutral age gate	A mechanism to request a user's date of birth or age in a neutral way – for example, prompting the user to provide their date of birth without explaining that they must be above a certain age, or without preventing the user from inputting a date of birth that is below the minimum, permitted age.		
self-declaration of age	When a user enters enter their birthdate or provides their age.		
sign-up	The process of creating an account on an online service.		
social media/ social media service	'Social media' is a term commonly used to describe any online social network. Under the Online Safety Act 2021 (Cth), this is an online service that enables social interaction between users. For the		

Behind the screen: Transparency report

purposes of this report, 'social media' and 'social media service' refer to the eight online service providers that received the section 20 Information Requests that are the subject of this report, irrespective of whether they may meet another service definition in the Online Safety Act: Discord, Facebook, Instagram, Reddit, Snap, TikTok, Twitch and YouTube. These services may also meet other definitions under the Act, for example, they may constitute 'relevant electronic services'.

#### Commissioner's foreword

#### Reflecting on two decades of progress

Over the past 20 years, I have witnessed monumental changes in how technology has transformed the way young people engage with the world.

My work at the cross-section of children's online safety and **age assurance** began in 2008, during my time at Microsoft, which contributed to Harvard's Internet Safety Technical Taskforce. The Taskforce consisted of a group of Internet businesses, non-profit organisations, academics and technology companies that joined together to identify effective tools and technologies to create a safer online environment for young people. Armed with this knowledge, I spearheaded an effort to run an age verification pilot through the auspices of Microsoft Australia, when both the technology and ecosystem were much less mature. Even then, the complexities of balancing children's access to online opportunities with their safety were apparent.

What was once a fledgling concern has now evolved into one of the most pressing regulatory and societal challenges of our time – and an issue that dozens of countries across the globe are seeking to address.

#### Addressing age assurance challenges

Today, children as young as eight are navigating **social media** platforms and other services originally designed for adults. While some of these services have long claimed to enforce minimum age requirements, millions of underage users continue to access them.

This raises urgent questions: How effective are these age restrictions in practice? What measures are social media platforms taking to assess the age of their users? And how do these processes impact children's online experiences? Are major global social media platforms today ready to implement more robust age assurance mechanisms in the short-term?

#### A nuanced view of age assurance

This transparency report, Behind the Screen: The Reality of Age Assurance and Social Media Access for Young Australians, represents a first for eSafety. By combining regulatory insights from industry with direct feedback from children themselves, we have captured not only the technical processes currently employed by social media platforms but also the lived experiences of young Australians.

The findings offer a nuanced view of age assurance and children's access to social media, highlighting areas where progress has been made, opportunities for improvement, and critical gaps that remain.

#### Australia's leadership in online safety regulation

Australia has long been at the forefront of online safety regulation. Since eSafety's establishment in 2015, we have worked tirelessly to ensure that research and evidence underpin our educational initiatives, regulatory decisions, and policy recommendations.

The introduction of the *Online Safety Act (2021)* (the Act), along with the creation of the <u>Basic Online Safety Expectations</u>, strengthened our ability to demand transparency and accountability from online service providers. Since 2022 we've done this through 27 mandatory reporting notices to some of the world's biggest tech companies.

In September 2024 we used new regulatory powers to request monthly active **end-user** information from eight prominent services that members of the public might generally call 'social media platforms' (though they may meet multiple definitions of different services under our Act): Discord, Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, and YouTube. Our requests aimed to uncover how these services identify the ages of their users, so they can enforce their own minimum age requirements and ensure appropriate safety settings are in place for young users.

#### Listening to young voices

However, regulatory data alone cannot provide a complete picture.

Children are the only ones who can truly speak to their online experiences – the benefits, the risks, and the ways they navigate age restrictions.

That is why this report also draws on findings from eSafety's nationally representative <u>Children and Social Media</u> research, which surveyed Australian children aged 8 to 15. By understanding their experiences, we gain invaluable insights into how age assurance processes impact their ability to access and engage with social media services.

#### Shaping the future of online safety

This transparency report arrives at a critical juncture.

In late 2024, the Australian Parliament passed the *Online Safety Amendment (Social Media Minimum Age) Act*, which will require certain social media services to prevent under-16s having accounts.

This legislation aims to protect young Australians during a formative stage of their development. It places the onus squarely on relevant social media providers to enforce the minimum age for having an account – a significant shift away from relying on children to self-police their interactions with platforms and on parents and carers to act as the sole safety net.

Under this new legislation, the Minister can make rules about which services, or classes of services, are covered by or excluded from the definition of an age-restricted social media platform. eSafety has a legislated role to provide independent advice to the Minister about these rules. As of this report's publication, rules have not yet been made, and eSafety's advice has not yet been provided. Noting eSafety's **Information Requests** to service providers predated the introduction of the age restriction legislation, inclusion of particular social media services within this report should not be interpreted as an indication of the potential contents of any rules or eSafety's advice.

However, the findings of this report will be a helpful input to guide eSafety's next steps as we create industry guidance about what reasonable steps the platforms that are within scope of the new legislation must take to prevent under 16s having accounts. Likewise, they can help us assess whether the forthcoming industry-drafted Phase 2 Codes provide appropriate community safeguards to prevent children's access and exposure to age-restricted content. They will also shape our continuing work with industry, government, and the wider community through initiatives like the eSafety Youth Council.

By grounding our work in research, transparency, and collaboration, we aim to create a safer and more positive online environment for all young Australians.

#### A shared responsibility

On a personal note, this report reinforces a lesson I have carried throughout my career: online safety is a shared responsibility. While social media services must do more to implement age assurance measures and prioritise the best interests of children, we cannot expect them to act alone. The responsibility for child safety, including appropriate age assurance, must be shared across the digital ecosystem, including devices and their operating systems, app stores, search engines, and other services.

Parents and carers, educators, policymakers, and technology developers all have a role to play in fostering safer digital spaces. The onus cannot lie with just one of these groups. Most importantly, we must continue to centre the experiences of young people in our efforts. Their perspectives and insights show us why this work matters and point the way to solutions that truly meet their needs.

#### A call to collective action

I want to thank the children who took part in this research, as well as the industry providers who cooperated with our information requests. Your contributions have been instrumental in shedding light on the current state of age assurance and shaping the way forward.

I also acknowledge the dedicated efforts of eSafety's Basic Online Safety Expectations and Research teams, whose work brought this report to life.

Behind the Screen is more than a transparency report; it is a call to action. It challenges us to think deeply about how children across different age groups are currently using social media platforms, and how this may be facilitated through parental involvement as well as service providers' approach to age assurance. With the valuable information we now have at hand, we can demand greater accountability from online services and work collectively to make sure the digital world is one where young Australians can thrive.

Julie Inman Grant eSafety Commissioner

#### Introduction

eSafety is Australia's independent regulator and educator for online safety, working to make sure all Australians have safer and more positive online experiences.

Established in 2015, eSafety leads online safety initiatives across Australian government departments and agencies, and with global stakeholders, extending our impact beyond Australia's borders.

#### **Purpose of this report**

This report brings together findings from eSafety's research with children aged 8 to 15, alongside responses from eight major social media services to eSafety's Information Requests. Together, these findings shine a light on age assurance measures deployed in 2024 and how they were experienced in practice.

The purpose of this report is to foster greater transparency and accountability across the social media industry. By sharing these findings publicly, eSafety hopes to spotlight existing safeguards while also revealing areas where processes could be enhanced.

The information may also be useful to eSafety in performing its broader functions and exercising its other regulatory powers. This may include formulating guidelines on reasonable steps for relevant social media platforms to prevent age-restricted users having accounts.<sup>1</sup> It may also inform eSafety's work in relation to <a href="Phase 2 Industry Codes">Phase 2 Industry Codes</a> for age-inappropriate content. The report can be read together with other key eSafety reports on the topic of age assurance, including the <a href="eSafety Tech Trends">eSafety Tech Trends and Challenges Paper on Age Assurance</a> which provides useful context.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> For more information regarding social media minimum age, see eSafety's webpage: <a href="https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions">https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions</a>.

<sup>&</sup>lt;sup>2</sup> eSafety Commissioner (2024), 'eSafety Tech Trends Issues Paper, Age Assurance', accessed 28 October 2024.

#### Our approach

In September 2024, the eSafety Commissioner (eSafety) took steps to understand the reality of social media use among Australian children aged 8 to 15.

Many online services have had well established age restrictions for their services for many years – generally 13 years has been the minimum age<sup>3</sup> – but there are potentially millions of Australian children under the age of 13 still gaining access despite these rules. eSafety set out to answer a pressing question: What – if anything – were these services doing to assess the age of their users, and how was this playing out in practice among children?

We took a two-fold approach.

First, we went straight to the source, asking children about their social media use in eSafety's <u>Children and Social Media</u> research, a nationally representative survey of 8- to 15-year-olds living in Australia.

Then, leveraging new regulatory mechanisms under the Online Safety (Basic Online Safety Expectations) Determination 2022 (the Determination)<sup>4</sup>, we requested information from the providers of eight online services used by Australians – Discord, Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, and YouTube – to understand what steps they took in January to July 2024 to assess the age of users for purposes of enforcing their minimum age requirements. eSafety requested information from these service providers for the following reasons:

- The terms of use of these services permitted use of the services from age 13.
- These online services are among those that generally have a significant user base in Australia.
- Although some online services may use certain safety measures specifically for children who are 13 or older, eSafety did not have up-to-date details about what steps services were taking to identify the ages of their users in the first place.
- eSafety had previously obtained some relevant information from some of these service
  providers through routine engagement as well as through non-periodic reporting notices
  (such measures to identify the age of users at sign-up), however, this information was
  limited.

<sup>&</sup>lt;sup>3</sup> There may be several reasons for the age limit being 13, including to comply with a US law — the Children's Online Privacy Protection Act of 1998 (COPPA), which prevents collection and storage of personal information from children under 13 years of age. The age limit of 13 does not necessarily mean that a service is unsafe for users under 13.

<sup>4</sup> Online Safety (Basic Online Safety Expectations) Determination 2022, as amended by the Online Safety (Basic Online Safety Expectations) Amendment Determination 2024: <a href="https://www.legislation.gov.au/F2022L00062/latest/text">https://www.legislation.gov.au/F2022L00062/latest/text</a>.

The Explanatory Statement to the Online Safety (Basic Online Safety Expectations) Amendment Determination 2024 provides that information obtained under the Determination will 'assist the Commissioner in assessing the reach and prevalence of the service within Australia, and consequently the level of risk a service poses to Australian adults and children. This will improve the Commissioner's capacity to support Australians by identifying where Australians are most likely to need support and support the Commissioner's regulatory functions'.

Our questions to the eight services were targeted and specific: What tools, technologies and processes did they use to assess the age of users? At what point of the user experience were tools and technologies used – for example, at sign-up, or continuously (proactively) to detect users who bypass initial interventions? How easy was it to report a user under the minimum age, and how did services respond once they knew a user was too young to be on the service?

This report reveals the findings of the responses we received from children aged 8 to 15 themselves, alongside the information we received from services.

## The state of play: children under 13 are accessing social media

80% of the surveyed children aged 8 to 12 used one or more of the eight social media services in 2024<sup>6</sup> – despite policies prohibiting users under 13.<sup>7</sup> YouTube<sup>8</sup> was the most popular service used by children under 13. Most surveyed children aged 8 to 12 accessed YouTube without their own account, with many reporting using their parent or carer's account or using the service without an account. However, some may have accessed YouTube through their own account connected to an adult account via Family Link. While children under the age of 13 are permitted to use YouTube if their account is connected to an adult account through Family Link,<sup>9</sup> even when excluding YouTube from these findings, a significant proportion (44%) of surveyed children aged 8 to 12 had used at least one of the other social media services in 2024.

Alongside YouTube, Snapchat and TikTok were the most popular services used by surveyed children aged 8 to 12. Other services – Facebook, Instagram, Discord, Twitch and Reddit, were also popular, though to a lesser extent than the most popular services already mentioned. Many

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<sup>&</sup>lt;sup>5</sup> Survey findings in this report draw on a subset of data from eSafety's *Children and Social Media (2024)* research, which explored children and teen's access to and use of social media and messaging services. The findings in this report focus specifically on the following social media services: Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube, and Discord.

<sup>&</sup>lt;sup>6</sup> Survey findings refer to the period between January and September 2024.

YouTube permits children under 13 to access YouTube with a supervised account through Family Link, Google (n.d)., 'Set up pre-teen supervised accounts', accessed 28 October 2024 <a href="https://support.google.com/youtube/answer/10314074?hl=en">https://support.google.com/youtube/answer/10314074?hl=en</a>.

<sup>&</sup>lt;sup>8</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

<sup>&</sup>lt;sup>9</sup> Google, n.d., 'Get started with Family Link', accessed 23 May 2024

children aged 8 to 12 who used social media (54%) accessed these services via their parent's or carer's account(s), however, a significant minority (36%) had their own account on at least one of these services. While many children aged 8 to 12 set up at least one of these accounts with the help of their parent or carer, there was some variation across the services in terms of whether children aged 8 to 12 set up accounts with or without help, and who they received help from.

The reliance on truthful **age self-declaration** at the point of account sign-up to these services<sup>10</sup> appears to have been insufficient in preventing many under-13 users from creating an account for services that are not suitable for them. There are many benefits to children connecting online, however there are also risks and harms once children are on a social media service. Among other things, they can be exposed to harmful or distressing content, abuse from other users, and inappropriate contact from adults they do not know. If a false date of birth was provided which indicates that a young child (say, 8) was an adult (say, 18), then that child would not have benefitted from any of the default **privacy and safety settings** the service may have implemented for children who are permitted to use it (children 13 to 17), leaving them exposed to risks and to harms.

Some services deployed tools and technologies to proactively detect children under 13 who bypassed the initial self-declaration. Others implemented tools, technologies or processes at different points to assess the age of users.

Snapchat, TikTok and Twitch deployed **language analysis technology** to detect signals of users who may be under 13. TikTok and Twitch also used **artificial intelligence** (AI) driven age estimation to detect under-13s, and YouTube used classifiers<sup>11</sup> to detect channels which may be operated by users who may be under 13. The use of tools and technologies is important, given the sheer scale of these services.

Facebook, Instagram and Discord had age estimation models in place to assess the age of users, but only whether a user was an adult (18+) or a child aged 13 to 17. These models were not calibrated to detect under-13 users.

Reddit collected no age-related data at account sign-up, instead relying on users to truthfully self-identify as under the age of 18 when accessing 'mature content' and deployed no proactive tools or technologies to detect under-13 users. Although children aged 8 to 12 reported lower engagement with Reddit (3%) than other services, introduction of measures would assist Reddit to remain an adult focused service. It is noteworthy that Twitch – which like Reddit, only 3% of

<sup>&</sup>lt;sup>10</sup> All social media services subject of this report except Reddit required or prompted users to provide their date of birth at the point of account sign-up. Reddit did not collect or require any age-related information from users at account-sign up.

<sup>&</sup>lt;sup>11</sup> Generally, a classifier is an algorithm that automatically orders or categorises data into one or more of a set of 'classes.' They are rules that map input data into predefined categories.

children aged 8 to 12 reported using – deployed tools and technology and had processes in place to assess the age of its end-users.

There is no baseline, and no consistency across services. Some services are doing a lot and investing in tools, technology and/or processes, while others are doing very little. This reveals a disconnect between some services' own terms of use, and how they enforce their own rules.

# Why this matters: The real-world impact on children's online safety

These findings are highly relevant to the online safety and digital rights of children.

Where children go undetected on services which were not designed with their safety in mind, they may be exposed to harmful material and activity that they are not developmentally ready for, nor equipped to manage and process.

If social media services are able to identify when a user is, or is likely to be, a child under 13 not permitted on the service or a child aged 13 to 17 who is allowed on the service, actions can be taken to help prevent these harms.

- The service can ensure that a user meets the minimum age permitted to access the social media service. This age is often set out in the service's terms of use or other policies it is generally 13. Or it may be determined under relevant laws, such as the social media minimum age which will limit certain social media services to account holders aged 16 and older by December 2025.<sup>12</sup>
- Where a user is (or is most likely) under 18, the service can provide them with ageappropriate information and user empowerment controls to help them use the service safely, abide by any rules (such as standards of conduct or community guidelines) and seek help if something goes wrong. It also allows the service to implement high default privacy and safety settings.

If an underage user successfully bypasses the relatively simple barrier of truthful self-declaration, it becomes a matter for the service to detect them subsequently by other means – and take action to remove them.

However, only 10% of children aged 8 to 12 who had their own social media account reported that their account(s) had been shut down between January and September 2024. While some

<sup>&</sup>lt;sup>12</sup> The Minister will make legislative rules specifying services that are or aren't covered. The eSafety Commissioner will provide advice to this process through separate independent assessment. Additional information about the social media minimum age is available on the eSafety website: <a href="https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions">https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions</a>.

children aged 8 to 12 were unsure or didn't want to say (9%), most (80%) of the surveyed under-13s had not experienced their account(s) being shut down due to their age, between January and September 2024. However, it is possible that some had one or more accounts shut down previously. It's also possible that some had YouTube accounts that were connected through Family Link and so were permitted. Therefore, while these findings provide a preliminary indication of the number of children aged 8 to 12 who had social media accounts and have had one or more of their accounts shut down in 2024, further research is required.

#### A path forward: encouraging uplift and consistency

For industry this report makes a powerful case for prioritising appropriate age assurance and associated protective measures for children.

Noting the positive steps some services are already taking, there are many reasons service providers should be considering the effectiveness of measures they have in place to enforce their own terms of use. They also need to consider compliance with:

- relevant Basic Online Safety Expectations, including taking reasonable steps to keep users safe online (s6), taking reasonable steps to ensure that technological or other measures are in place to prevent access to class 2 material (s12) and taking reasonable steps to detect and enforce penalties for breaches of terms of use (s14).
- other requirements under the Act which deal with children's access to certain material, including the Restricted Access Systems Declaration<sup>13</sup> and the forthcoming Phase 2 industry codes which aim to prevent children from accessing or being exposed to ageinappropriate content (class 1C and class 2 material) online
- the social media minimum age which will limit account access on certain social media services to users aged 16 and older
- emerging international requirements<sup>14</sup>.

This report reveals where steps are being taken, what is possible now, and where there are gaps and inconsistencies. It shows some services actively investing in the detection of under-13 users, while there's room for improvement and renewed vigour for others.

<sup>&</sup>lt;sup>14</sup> For example, the UK Online Safety Act 2023 places a range of duties on social media and other services in relation to online safety, including in relation to age assurance. Ireland's Online Safety Code requires designated video-sharing platforms (including but not limited to Facebook, Instagram, TikTok, YouTube) to use age assurance to prevent children from encountering pornography or gratuitous violence online and having age verification measures in place as appropriate.

Proactive detection, simplified user reporting, and robust re-registration controls for banned underage users can provide important interventions, along with additional friction at the point of account sign-up.

Positive uplift across some services in certain areas would be a significant step forward. It would also send a clear message that the online industry is not only aware of its responsibilities but actively committed to safeguarding young users.

### **Key findings**

# What did children aged 8 to 12 and 13 to 15 say?

#### Almost universal social media use among children aged 13 to 15

- 95% of 13- to 15-year-olds surveyed used social media in 2024.<sup>A</sup>
- Most popular services: YouTube (73%), Snapchat (63%), TikTok (62%), and Instagram (56%).
- Facebook and Discord saw moderate use among children aged 13 to 15 (41% and 27%, respectively), with lower engagement on Twitch (12%) and Reddit (8%).



#### Widespread social media use among children under 13

- 80% of 8- to 12-year-olds surveyed used<sup>B</sup> social media in 2024, despite a 13+ age restriction on all surveyed services.<sup>C</sup>
- Estimated impact: Considering Australia's population of 1,596,302
   8- to 12-year-olds,<sup>D</sup> this suggests that about 1.3 million children aged
   8 to 12 in Australia may be using social media, highlighting potential widespread breaches of age policies.



A Social media use was assessed by asking participants which social media services they had used since the beginning of 2024. Participants were informed that this could be at home, at school, at a friend's house, or anywhere else they go online.

B As above.

<sup>&</sup>lt;sup>c</sup> While children under the age of 13 are permitted to use YouTube if their account is connected to an adult account through Family Link, even when excluding YouTube from these findings, a significant proportion (44%) surveyed children aged 8 to 12 had used at least one of the other social media services this year.

<sup>&</sup>lt;sup>D</sup> According to Australian Bureau of Statistics 2021 Census data. Australian Bureau of Statistics. (2021). Age (AGEP) [Census Table Builder], accessed 24 September 2024.

### A variety of access methods for children under 13, including assistance from parents and carers

- 36% of children aged 8 to 12 who reported using social media had their own account(s), while 54% used their parent's or carer's account(s), and 5% used a sibling's or friend's account. 27% used one or more services without an account.
- Among children (aged 8 to 12) who had their own account(s), 77% had help setting up at least one account, with this help mostly coming from parents or carers.
- 84% of children (aged 8 to 12) with accounts reported that their parents or carers knew about their account(s).

#### Few account shutdowns for age violations

- 80% of children aged 8 to 12 who had one or more social media accounts reported no account shutdowns in 2024 due to being underage.<sup>E</sup>
- Only 10% of children (aged 8 to 12) had their account(s) closed for being under 13 in 2024.
- 9% of children (aged 8 to 12) were unsure or didn't want to say if their account(s) had been shut down in 2024.<sup>F</sup>

<sup>&</sup>lt;sup>E</sup>This may be an underestimation of the number of children who have ever had an account shut down by a social media service. Additionally, some of the surveyed children aged 8 to 12 who currently had a social media account may have had a YouTube account connected to an adult account through Family Link; such children would therefore be permitted to use YouTube through their Family Link account and we wouldn't expect their account to be shutdown.

F This may include children who no longer used their account(s) and were consequently unsure of the status of their account(s).

# What did the eight social media services report?

#### Widespread use of social media services by children aged 13 to 17

Services reported on the average number of Australian monthly active end-users aged 13 to 17 (inclusive).

Instagram - 1,088,980

Snapchat - 1,034,071

YouTube - 643,670

TikTok - 522,863

Facebook - 455,054

Discord - 222,189

Twitch - 24,466

Reddit - Did not know

There are differences in how each service calculated the average number of Australian monthly active end-users which means these numbers may not be directly comparable across services. More information about the different methodologies used, and relevant caveats and qualifications, is set out on page 30. More specific breakdowns of age for user under 18 is also set out on page 30. Services generally calculated monthly active end-users based on users with an account. Some of these services can be accessed – either on a limited basis, or extensively – without an account.



#### Reddit did not know how many children used its service

- All services except Reddit provided data on the number of Australian users aged aged 13 to 17 on the service<sup>G</sup>.
- Reddit did not collect or require any age-related information from users at account sign-up, or infer a user's age once they were on the service. Reddit had no proactive measures in place to assess whether a user may be under 13, and relied on users to affirm that they were over 18 when attempting to view mature content.



#### Reliance on self-declared ages

- At a user's first point of access, every service that required date of birth at sign-up or
  for account access relied solely on users' truthful self-declaration of date of birth –
  no additional verification or age assurance tools were used upfront at this first point
  of access.
- Research demonstrates that children will often enter a false birthdate to obtain access to a service. Research also demonstrates that in some cases, parents will agree to help set up an account for their child with a false age, due to pressure to enable their children to access services and fear that their child may struggle socially.



<sup>&</sup>lt;sup>a</sup> Reddit stated that it was unable to provide an estimate as to how many accounts belong to Australian users between the age ranges of 13 to 15, and 16 to 17, because it 'minimizes the data that it collects from users, and does not currently collect age or make inferences based on a user's personal information as reflected in our Privacy Policy and principles.' Reddit also stated that 'external third-party research provided insight into the estimated age of its userbase, with the majority of end-users found to be over the age of 18.

<sup>&</sup>quot;See, for example, research commissioned by OfCom which found that a third of children from ages 8 to 17 with a social media profile had an adult user age after signing up with a false date of birth: 'Children's Online User Ages' (2022) <a href="https://www.ofcom.org.uk/online-safety/protecting-children/a-third-of-children-have-false-social-media-age-of-18">https://www.ofcom.org.uk/online-safety/protecting-children/a-third-of-children-have-false-social-media-age-of-18</a>.

United Kingdom Information Commissioner's Office (October 2024) 'Children's Data Lives 2024', <a href="https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/research-and-reports/children-s-data-lives-research/">https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/research-and-reports/children-s-data-lives-research/</a>

#### Varied use of proactive age assessment tools

- Most services developed and/or implemented proactive technology and tools to assess age of users.
- Under-13 proactive age assessment tools: TikTok, Twitch and Snapchat used language analysis; YouTube used classifiers on channels; TikTok applied AI and facial age estimation in the form of age inference models; Twitch also used audio, behavioural and traffic analysis tools.
- 13-17 or 18+ proactive age assessment tools: Discord, Facebook, Instagram, TikTok, Snapchat and YouTube used age inference models to detect whether a user was under 18 (for example, an age from 13 to 17) 18 and older. TikTok also used language analysis.

#### Active efforts in age assessment research

- Facebook and Instagram, Reddit, Snapchat<sup>J</sup>, TikTok, Twitch and YouTube undertook research during the reporting period to further develop existing tools or implement new tools for assessing users' ages.
- Although all services except Reddit were already deploying tools and technology to some extent (either in relation to detecting under-13 users or detecting children allowed on the service (those aged 13 to 17), eSafety considers that it is important to continually look to refine and improve processes over time, including by seeking out and testing additional solutions.



#### Lack of data on under-13 users for some services

• Although all services became aware of some under-13 users on their services (in some cases, hundreds or thousands of under-13s), only Twitch and TikTok undertook any research to estimate, investigate and identify the total number of end-users on the service who may be under 13, during the period January to July 2024.

<sup>&</sup>lt;sup>J</sup> Although Snap reported that it undertook research, the examples provided by Snap of research it undertook do not strictly relate to developing or implementing tools on the Snapchat service.

#### Complicated processes to report an under-13 user

- All services except Snapchat and YouTube reported having a specific category to assist
  users to report a suspected under-13 user. Snapchat has recently improved its processes
  for reporting.<sup>K</sup>
- Although Instagram and Facebook provided specific categories to report an under-13 user,
  these services required users to complete a webform which required multiple pieces of
  information from the reporter (some of which, the reporter may not know), which presents
  a barrier to reporting. YouTube's in-service reporting mechanism also required multiple
  details, and did not provide a specific category to report an under-13 user.
- Some services did not provide reporting mechanisms on all parts of the service, or did not make the reporting mechanisms available in-service (meaning users were required to locate a separate webform or email address to make a report).
- Discord, TikTok and Twitch stand out as best practice for providing in-service user reporting options on multiple parts of the service and for providing specific reporting categories and not requiring multiple pieces of information to submit the in-service report.



#### Re-registration loopholes for some services

- Facebook, Instagram and Snapchat did not use any indicators from banned accounts to prevent those same banned under-13 users from re-registering an account while still underage.
- Discord, Reddit, TikTok, Twitch and YouTube did use indicators to prevent banned users from re-registering while still underage.

<sup>&</sup>lt;sup>K</sup> Snap reported to eSafety that it introduced a specific in-app reporting category for reporting under-13 users, for Australians, in October 2024. During the reporting period, Snap enabled reporting of suspected underage accounts via an online webform on the Snapchat Support website.

#### What does this information tell us?

These findings indicate there is inconsistency across industry regarding the steps taken to assess the age of end-users at various points in the user experience. However, there is one thing they have in common: a lack of robust interventions at the point of account sign-up to a service to prevent someone under 13 from providing a false age or birthdate to set up an account.

Snapchat, TikTok, Twitch and YouTube deployed tools or technology specifically to detect whether a user may be under the permitted age of 13, once they were using the service.

Some providers used specific tools or age estimation models to proactively assess the age of end-users once they were on the service to detect whether a user was 13 to 17, or whether a user was 18+ years, for various purposes such as:

- limiting access to age-restricted content (YouTube)
- applying appropriate advertising (Snapchat)
- implementing content and feature restrictions or 'teen safety settings' (Facebook, Instagram, Snapchat, TikTok).

The approach of relying solely on accurate self-declaration of age at the point of account signup appears to be both flawed and inadequate, as children aged 8 to 12 reported they were still creating accounts on the majority of these services (outside of circumstances where such accounts are expressly permitted) – sometimes of their own volition and sometimes with the assistance of a parent or carer, a sibling or a friend. Only a minority of children aged 8 to 12 (10%) who had their own account reported that their account(s) had been shut down at some point in 2024 due to being underage. While the use of proactive tools, technologies and other processes is important in assisting subsequent detection of under-13 accounts, there is room for more innovation and intervention at the point of sign-up. Proactive tools and technologies may rely on a user actively engaging with a service (such as connecting with others, communicating with others, sharing and creating content) to detect relevant signals. This may require time and engagement to detect a child under 13, and in that time the child may be exposed to risks and harms.

This report reveals where there were interventions services are using and testing, and where there is further work to do to ensure services are able to assess the age of their end-users, particularly in relation to ensuring users are of the minimum permitted age.

<sup>&</sup>lt;sup>15</sup> See page 75 for the number of accounts that services shut down for being determined to be under the permitted age of use (13). There is considerable variation in the number of accounts that services shut down, which likely relates to the fact that some services are taking some steps to detect under-13 accounts, whereas others are doing less or very little.

Service providers should review their systems and processes early and often, and to look to develop and implement technical or other interventions across the entire user experience of a service, including:

- limiting or mitigating reliance on self-declaration at the point of sign-up to a service
- exploring and implementing technology and tools to assist in proactive detection of users who may be under the minimum age
- implementing processes to support the use of proactive tools, such as human moderator review and appropriate age assurance processes, where a greater degree of certainty is required to assess age
- ensuring user reporting mechanisms are clear and readily identifiable and enable people to report users under the minimum age without significant barriers or burdensome processes
- implementing appropriate measures to ensure any actions such as account suspensions or removals are not circumvented
- undertaking research to understand the potential scale of breaches of the service's minimum age rules, and implementing proportionate and rights-respecting mechanisms to address this.

In addition to allowing service providers to enforce their own terms of use, these types of steps may also be relevant to services as they develop compliance strategies for new regulatory requirements in 2025, including:

- requirements on, yet to be determined, age-restricted social media platforms from late 2025 to take 'reasonable steps' to prevent users under the age of 16 from having accounts – eSafety will provide detailed regulatory guidance later in 2025 about what reasonable steps may be appropriate
- Phase 2 of eSafety's Industry Codes, currently in development, that may also require
  multiple sections of the online industry to perform reasonable and appropriate age
  assurance to prevent underage users from accessing or being exposed to harmful or
  age-inappropriate materials on their services, as detailed in draft industry-authored
  codes these codes may be registered in 2025 if they create appropriate community
  safeguards.

#### **Methodology**

eSafety has the ability under the Act and the Basic Online Safety Expectations Determination 2022 to require or request information from certain online service providers about online safety matters, including the steps they are taking to keep users safe online. This report summarises responses from eight social media services that received Information Requests about their userbase from eSafety. It compares those responses to the findings from eSafety's research into Children and Social Media.

#### **Insights from the Children and Social Media Survey**

In September 2024, eSafety conducted the <u>Children and Social Media Survey</u> – a 10-minute online survey with a nationally representative sample of children in Australia aged 8 to 15. This survey aimed to shed light on how children have been using social media and messaging services throughout 2024 (specifically, between January and September 2024). The findings in this report draw on a subset of this data and focus specifically on the following social media services: Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube, and Discord.

#### Survey scope and demographics

A total of 1,504 children participated, including 1,049 children aged 8 to 12 and 455 children aged 13 to 15. This report primarily examines the experiences of children aged 8 to 12 unless otherwise indicated.

The survey received ethical approval from the Bellberry Ethics Committee (Approval 2024-08-1018) on 9 September 2024, and eSafety obtained informed consent from both participants and their parents or carers.

#### Survey focus areas

The survey included several key questions about children's social media use:

**Social media usage:** Children were asked if they had used social media services since January 2024, including Discord, Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch or YouTube.

**Account ownership:** Children were asked whether they held their own profile or account on any service they used, or whether they used these services without an account or used someone else's account.

**Assistance with account setup:** Children were asked whether someone had helped them set up their account(s) and, if so, who that person was.

**Parental awareness:** Children were asked if their parents or carers knew about their social media account(s).

**Account shutdowns due to age:** Finally, children were asked if any account of theirs had been shut down by a service in 2024 for being under the minimum age.

## Insights from information requests under the Basic Online Safety Expectations

On September 2, 2024, eSafety issued Information Requests to providers of eight major social media services – Discord, Google (YouTube), Meta (Facebook and Instagram), Reddit, Snap, TikTok, and Twitch.

These requests, made under section 20 of the Determination sought specific information related to the userbase of these services, and the measures in place to assess the age of endusers.

#### Purpose and scope of the Basic Online Safety Expectations

The Expectations, established under the Act, outline expectations for social media providers and other services that they will, among other things, take reasonable steps to ensure the safe use of their services. One of the expectations is that service providers will give information to eSafety on request, including:

**user safety measures** – information on measures in place to ensure safe use of a service for all end-users (section 20(3))

**user demographics** –data on the number of active users in Australia, specifically the numbers of both adult and child end-users (section 20(5)).

eSafety's Information Requests covered data in relation to Australian end-users for the period from 1 January to 31 July 2024, aiming to gauge what measures services had in place to assess the age of their users. In particular, eSafety asked questions about the measures in place to assess whether a user may be under the permitted age of 13 (according to each service's terms of use) and using the service against the service's own rules.

In this report, we focus only on those services that were sent Information Requests: Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube, and Discord. Where we refer to 'social media services', we are referring specifically to these eight services. The public may broadly refer to these services as 'social media', but they may meet multiple definitions of services within the meaning of the Online Safety Act and may or may not ultimately fall within the scope of forthcoming minimum age obligations.

#### How to read this report

This report presents a comprehensive view of social media use among Australian children aged 8 to 15 in 2024 by analysing both survey data from these young users and direct information from the eight social media services.

It is important to note the following difference in reporting periods:

- Children were asked about their experiences from January to September 2024.
- Social media service providers were asked to report on the number of users and age assurance measures in place for the period January to July 2024.

Additionally, children were asked about whether they had 'used' social media, whether through their own account, someone else's account, or no account at all. Social media services were asked about the average number of Australian active end-users, and each service applied their own methodology to calculate the number of users of their service. Generally, this included users logged in with an account. Some of these services can be accessed – either on a limited basis, or extensively – without an account.

By comparing these findings (with appropriate caveats and qualifications, including the difference in reporting periods), eSafety reveals how children – especially those under 13 – engaged with these services.

For a snapshot of the efforts of each social media service, this report sets out summary tables and presents additional information for each provider in individual summaries at the end of the report.

eSafety recognises that each social media service is different – with different functionality, architectures, business models and user bases. This means an intervention or tool which may be proportionate and appropriate on one service, may not be on another. Accordingly, when reviewing the tables, it's important to consider the nature of the service and the context in which the service operates, as well as the risk of online harms associated with that service.

This report is not a statement about the appropriateness of actions taken by social media services, and it does not make a conclusion regarding compliance with the Expectations. eSafety intends that this report is a useful transparency and accountability tool that provides information about the actions service providers are taking to keep all Australians – including children - safe online.

Unless otherwise stated, all data reflects Australian users.

# How many Australian children are using social media?

Social media services generally set a minimum age of permitted access, which is often set out in their 'terms of use' or 'terms of service' <sup>16</sup>. The table below outlines the minimum age requirements of the eight social media services that are the subject of this report, for the period of January to July 2024. There was a consistent minimum age requirement of 13, with one exception in relation to YouTube. Some services can also be accessed without creating an account.

#### Table 1

Service	Terms of use – age policies for the period January to July 2024				
Discord	Discord Inc's terms of service permitted users from the age of 13. <sup>17</sup> Discord required all age-restricted content to be clearly labelled and <b>age gated</b> to prevent users under 18 from accessing that content. <sup>18</sup> Discord's website stated that it employs a range of safeguards for (self-declared) teen accounts for children 13+ including stronger default privacy and security settings than those of adult accounts. <sup>19</sup> Discord required users to make an account to access most content but users could access certain areas of Discord without an account if they were provided an invite link by someone else. <sup>20</sup>				
Facebook	Facebook permitted users from age 13. <sup>21</sup> Facebook deployed a range of safeguards for (self-declared) teen accounts for children aged 13+ including stronger default privacy, security and content settings on accounts for users under the ages of 16 and 18 by default. <sup>22</sup>				
Instagram	Instagram permitted users from age 13. <sup>23</sup> Instagram deployed a range of safeguards for (self-declared) teen accounts for children aged 13+ including stronger default privacy, security and content settings for users under the age of 18 by default. Children under 16 needed their parent's or guardian's permission to change these stronger default settings. <sup>24</sup>				

<sup>&</sup>lt;sup>16</sup> eSafety refers generally to 'terms of use', but in Table 1 we have also used 'Terms of Service' where a service uses this term.

<sup>&</sup>lt;sup>17</sup> Discord (2024) 'Discord's terms of service', accessed 9 April 2024.

<sup>&</sup>lt;sup>18</sup> Discord (2024), 'Why is Discord asking for my birthday?', accessed 11 November 2024.

<sup>&</sup>lt;sup>19</sup> Discord (2023), 'Building a Safer Place for Teens to Hang Out', accessed 14 November 2024.

<sup>&</sup>lt;sup>20</sup> Discord (2023) 'Invites 101', accessed 14 November 2024.

<sup>&</sup>lt;sup>21</sup> Meta, 2024, 'Creating an account' URL: https://www.facebook.com/help/570785306433644/?helpref=hc\_fnav (Except in countries where the minimum age is 14. In Facebook's Terms of Service, Meta Platforms, Inc. states that a person cannot use its services if they are under 13 years of age (or are of the minimum legal age in the user's country). Meta, 2024, URL: 'How do I report a child under the age of 14 on Facebook in South Korea, Spain or Quebec, Canada?', accessed 28 October 2024.

<sup>&</sup>lt;sup>22</sup> Meta (2024), 'Teen privacy and safety settings', accessed 14 November 2024

<sup>&</sup>lt;sup>23</sup> Meta (2024), 'About Instagram teen privacy and safety settings', accessed 11 November 2024

<sup>&</sup>lt;sup>24</sup> Meta (2024), 'About Instagram teen privacy and safety settings', accessed 11 November 2024

Reddit	Users were permitted to create an account with Reddit from age 13. <sup>25</sup> <sup>26</sup> However, users could access most content on the service without an account, regardless of their age. Access to Reddit content labelled as mature was restricted to those with an account. All account holders could choose to view mature content by changing their account preferences and opting to view 18+ content <sup>27</sup> – there was no specific minimum age requirement in Reddit's User Agreement. <sup>28</sup>
Snap	Users under the age of 13 were not permitted to create an account on Snapchat. <sup>29</sup> Snapchat deployed a range of safeguards for (self-declared) teen accounts for children aged 13+ including stronger default privacy and security settings than those of adult accounts. <sup>30</sup>
TikTok	Users who were 13 and older were permitted to use TikTok. <sup>31</sup> Users under the age of 13 are not permitted to create an account. Some TikTok content could be accessed without an account, though this was a more limited experience. TikTok employed a range of safeguards for (self-declared) teen accounts for children aged 13+ including stronger default privacy and security settings than those of adult accounts. <sup>32</sup>
Twitch	Twitch permitted users aged 13 years and older. <sup>33</sup> For (self-declared) users aged 13 to 17, Twitch only permitted use of its service under the supervision of a parent or legal guardian. Twitch required users to sign up for an account to stream or upload content, and an account was necessary to interact with any other users such as by participating in chats or sending Whispers (private messages). <sup>34</sup> Users were not required to have an account or be logged in to view general content on Twitch, meaning they could view a range of content regardless of their age. <sup>35</sup> However, to access streams with mature themes such as sexualised content, gambling and content featuring R18+ games (which must be correctly labelled under Twitch's classification scheme), users had to be registered as 18 or older and logged in. <sup>36</sup>
YouTube	Google permitted users to create and use their own Google accounts, which allow access to YouTube from age 13. <sup>37</sup> Children under the age of 13 are permitted to use YouTube if their account is connected to an adult account through Family Link. <sup>38</sup> These 'supervised accounts' allow parents to control the content settings of YouTube to limit

<sup>&</sup>lt;sup>25</sup> Reddit (2024), 'User Agreement', accessed 14 August 2024

<sup>&</sup>lt;sup>26</sup> Reddit's User agreement provides that users must be 'at least 13 years old and over the minimum age required by the laws of your country of residence to access and use the Services', and that users must be able to 'form a binding contract with Reddit, or, if you are over 13 but under the age of majority in your jurisdiction, that your legal guardian has reviewed and agrees to these Terms.'

<sup>&</sup>lt;sup>27</sup> Reddit, 2024, 'How do I view NSFW communities?', accessed 14 August 2024

<sup>&</sup>lt;sup>28</sup> Reddit's User Agreement states: 'We may offer additional Services that require you to be older to use them, so please read all notices and any Additional Terms carefully when you access the Services.' However, it does not specify that a user must be 18 to access mature age content in its User Agreement. While access to adult content is off by default, if a user enables the 'Show Mature Content' toggle in their account settings they will be presented with a pop-up message which asks a user to press a button to confirm that they are over 18.

<sup>&</sup>lt;sup>29</sup> Snap Inc. (2024), 'Snap Terms of Service' accessed 27 March 2024

<sup>&</sup>lt;sup>30</sup> Snap (2024), 'Safeguards for Teens', accessed 14 November 2024

<sup>&</sup>lt;sup>31</sup> On its website, TikTok states: 'You must be 13 years and older to have an account. If we learn someone is below the minimum age to have an account on TikTok, we will ban that account.' Source: TikTok (2024), '<u>Youth Safety and Well-being – Community Guidelines</u>', accessed 20 August 2024.

<sup>32</sup> TikTok (n.d), 'Teen Privacy and Safety Settings', accessed 4 February 2025

<sup>33</sup> Twitch Interactive, Inc. (2024) 'Terms of Service', accessed 14 November 2024

<sup>&</sup>lt;sup>34</sup> Ofcom (2023), '<u>How video-sharing platforms (VSPs) protect children from encountering harmful videos</u>', accessed 13 August 2024

<sup>&</sup>lt;sup>35</sup> Ofcom (2023), '<u>How video-sharing platforms (VSPs) protect children from encountering harmful videos</u>', accessed 13 August 2024

<sup>&</sup>lt;sup>36</sup> Twitch Interactive, Inc. (2024), 'Content Classification Guidelines' accessed 14 November 2024

<sup>&</sup>lt;sup>37</sup> Google (n.d.), 'Age requirements on Google Accounts', accessed 23 May 2024

<sup>38</sup> Google (n.d.), 'Get started with Family Link', accessed 23 May 2024

which videos and music (self-declared) children under 13 could find and play.<sup>39</sup> It also restricted which account features and default settings the child could change.

However, users of YouTube were not required to sign into a Google account to access the service. This means that anyone could access YouTube, regardless of their age. YouTube limits access to videos that are age restricted to (signed-in) account holders who are over 18.<sup>40</sup> This means that YouTube users are not shown age restricted content until both their self-declared age is over 18 and the age assurance model used by YouTube is sufficiently confident that a user is aged over 18.<sup>41</sup> Content creators are able to proactively identify their content as being age-restricted.<sup>42</sup> Google also uses proactive technology to automatically apply age-restrictions to content.<sup>43</sup>

Google also offers a supervised account function for (self-declared) teens (children aged 13 to 17). This allows parents to gain insights into their child's YouTube channel activity. Supervision can be turned off by either a parent or a child aged 13+ at any time.<sup>44</sup>

Note: YouTube Kids is a separate app designed specifically for children (aged 0 to 12) that includes a smaller selection of videos than a supervised account on YouTube.<sup>45</sup> This report only discusses YouTube and does not include YouTube Kids.

#### What did children say about using social media?

Related key finding: Almost universal social media use among children aged 13 to 15

We found that almost all (95%) 13- to 15-year-olds surveyed had used social media between January and September 2024 (Figure 1).

- YouTube<sup>46</sup> was the most popular service among surveyed children aged 13 to 15, with 73% of 13- to 15-year-olds reporting having used YouTube.
- Almost 2 in 3 surveyed children aged 13 to 15 had used Snapchat (63%) or TikTok (62%), while over half (56%) had used Instagram.
- Four in ten (41%) children aged 13 to 15 reported having used Facebook, while just under 3 in 10 (27%) had used Discord.
- Fewer children aged 13 to 15 had used Twitch (12%) or Reddit (8%) in 2024.

While YouTube was the most commonly used service among children aged 13 to 15, children in this age group were most likely to have their own account on Snapchat. Over 9 in 10 (95%)

<sup>&</sup>lt;sup>39</sup> Google (2024), 'What is a supervised experience on YouTube?' accessed 14 November 2024

<sup>&</sup>lt;sup>40</sup> Google, (n.d.), 'Watch age-restricted videos', accessed 17 January 2025

<sup>&</sup>lt;sup>41</sup> Google (2020), 'Using technology to more consistently apply age restrictions' accessed 17 January 2025

<sup>&</sup>lt;sup>42</sup> Google (2024), 'Age-restrict your own video on YouTube', accessed 14 November 2024

<sup>&</sup>lt;sup>43</sup> Google (2020), 'Using technology to more consistently apply age restrictions', accessed 17 January 2025

<sup>&</sup>lt;sup>44</sup> Google (2024) 'Supervised experiences for teens', accessed 14 November 2024, URL:

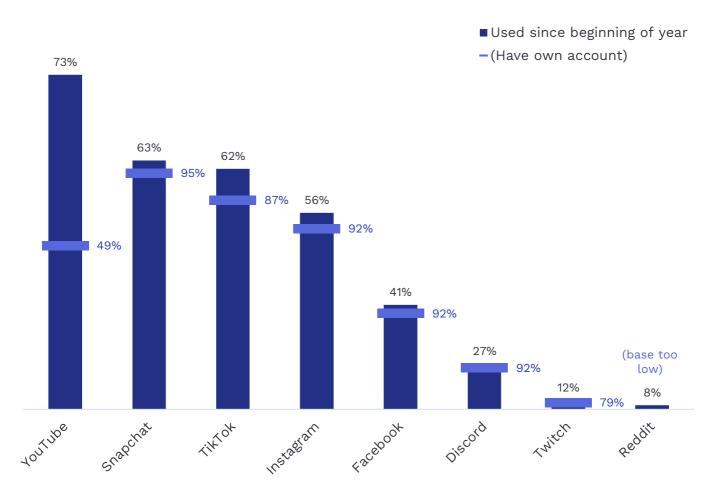
https://support.google.com/youtube/answer/15253498

<sup>&</sup>lt;sup>45</sup> Google (2024) '<u>Understand your choices as a family'</u>, accessed 14 November 2024, URL:

<sup>&</sup>lt;sup>46</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

surveyed children aged 13 to 15 who had used Snapchat in 2024 had their own account on the service. Similarly, over 9 in 10 children aged 13 to 15 who had used Instagram (92%), Facebook (92%) or Discord (92%) had their own accounts on these services, while just under 9 in 10 (87%) TikTok users had their own account. Almost 8 in 10 (79%) children aged 13 to 15 who had used Twitch had their own account, while fewer children aged 13 to 15 who had used YouTube (49%) had their own account. Although YouTube was the most commonly used service, the lower number of children aged 13 to 15 who reported having an account on YouTube may reflect the fact that YouTube can be largely accessed without an account, and may be accessed in a wide range of situations including in educational settings.

Figure 1: Social media services used by 13- to 15-year-olds from January to September 2024



**Sources**: C3 Have you used any of the following since the start of this year (since January 2024)? D1 Below are the websites and apps you said you have used since the start of the year. Some need a profile or account to be set up first. To do this you might have to choose a username, password, and maybe a picture, for the account. Do you currently have your own profile or account on any of the following websites or apps?

**Bases**: Used since beginning of year: 455 children aged 13 to 15. Have own account: range from 53 to 333 children aged 13 to 15 who had used each service in 2024.

**Note:** Base too low (n < 50) to report percentage of 13- to 15-year-old children who had used Reddit in 2024 and had their own account.

#### Related key finding: Widespread social media use among children under 13

Despite most social media services having an age minimum of 13, a large majority (80%) of 8- to 12-year-old children in our survey had used social media from January to September 2024 (Figure 2).

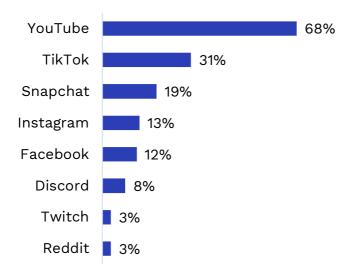
Considering Australia's population of 1,596,302<sup>47</sup> 8- to 12-year-olds, this suggests approximately 1.3 million 8- to 12-year-olds in Australia may have used social media in 2024.

- YouTube<sup>48</sup> was the most popular service used by surveyed children aged 8 to 12 (68%).
- Most surveyed children aged 8 to 12 accessed YouTube without their own account. Of those who accessed YouTube with their own account, some may have used an account connected to an adult account via Family Link, which is permitted.
- While children under the age of 13 are permitted to use YouTube if their account is connected to an adult account through Family Link or if enabled by their administrator for Google Workspace for Education account holders (meaning that children under 13 using YouTube in that way is not a breach of YouTube's age policy), YouTube's terms of service specify that you must be at least 13 years old to use YouTube, unless enabled by a parent or guardian.
- Even when excluding YouTube from these findings, a significant proportion (44%) of surveyed children aged 8 to 12 had used at least one of the other social media services in 2024.
- Almost 1 in 3 (31%) surveyed children aged 8 to 12 had used TikTok, while just under 1 in 5 (19%) had used Snapchat.
- Fewer children aged 8 to 12 had used Instagram (13%), Facebook (12%), Discord (8%), Twitch (3%) and Reddit (3%).
- 54% of children aged 8 to 12 who had used social media reported accessing these services via a parent/carer's account and 36% reported having at least one account. More information on how children under 13 were accessing these social media services, including whether they had their own account or used someone else's account, is set out from page 53.

<sup>&</sup>lt;sup>47</sup> According to Australian Bureau of Statistics 2021 Census data. Australian Bureau of Statistics. (2021). Age (AGEP) [Census Table Builder], accessed 24 September 2024.

<sup>&</sup>lt;sup>48</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

Figure 2: Social media services used by 8- to 12-year-old children from January to September 2024



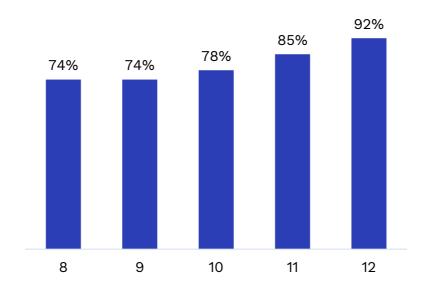
80% of 8- to 12year-old children surveyed had used a social media service since the beginning of 2024.

**Source**: C3 Have you used any of the following since the start of this year (since January 2024)?

Base: 1,049 children aged 8 to 12.

While the proportion of children aged 8 to 12 who had used social media increased with age (Figure 3), a significant majority (74%) of surveyed 8-year-old children had used social media from January to September 2024. This increased to 92% of surveyed 12-year-old children. Even when excluding YouTube, 1 in 3 (33%) surveyed 8-year-old children reported having used at least one of the other social media services over the period, increasing to almost 7 in 10 (69%) surveyed 12-year-olds (Figure 4).

Figure 3: Use of social media services from January to September 2024 by age

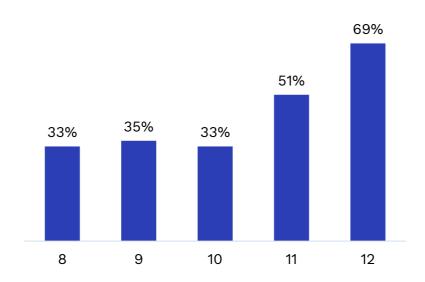


Source: C3 Have you used any of the following since the start of this year (since January 2024)?

Bases: Range from 190 to 228 children aged 8 to 12.

**Note:** Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube (not including YouTube Kids) and Discord.

Figure 4: Use of social media services since the beginning of 2024 by age, excluding YouTube



Source: C3 Have you used any of the following since the start of this year (since January 2024)?

Bases: Range from 190-228 children aged 8 to 12.

Note: Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, and Discord.

#### What did social media services report?

Related key finding: Widespread use of social media services by children aged 13 to 17

eSafety asked the eight social media services how many Australians – adults and children – used their services ('active end-users')<sup>49</sup> between 1 January 2024 and 31 July 2024. eSafety requested a break-down of how many of these end-users were aged 13 to 15, and aged 16 to 17.

Under section 20(5) of the Determination, service providers are expected, at eSafety's request, to provide a report on the number of 'active end-users of the service in Australia (disaggregated into active end-users who are children and those who are adult end-users) during a specified period'. However, the Determination does not define monthly active end users. To accommodate service providers' different data practices, and recognising that this is the first

<sup>&</sup>lt;sup>49</sup> The term 'active end-user' has been interpreted differently across social media services. The <u>Children and Social Media Survey</u>, by contrast, asked children aged 8 to 12, and children aged 13 to 15, if they had used a social media service between January 2024 and September 2024. There may therefore be some differences between a user who was considered to be an 'active end-user' of a service and a survey participant who reported 'using' a service.

information obtained under this Expectation, eSafety has allowed service providers to apply and explain their own approaches.

The information in Table 2 has been calculated by each provider in different ways, including due to the different nature of the services and how that provider defines 'active'. When interpreting the figures, it is important to consider these differences and that direct comparison may not be possible. More information on the methods used to calculate this information is set out following the table.

Table 2 - Australian monthly active end-users using social media services

Service	Average Australian monthly active end- users (total)	Average number of Australian monthly active end-users aged 13 to 17	Average number of Australian monthly active end-users aged 13 to 15	Average number of Australian monthly active end-users aged 16 to 17
Discord	3,020,592	222,189	98,508	123,681
Facebook	19,740,786	455,054	153,223	301,831
Instagram	19,365,679	1,088,980	351,135	737,845
Reddit	3,690,000	Not provided	Not provided <sup>50</sup>	Not provided <sup>51</sup>
Snapchat	8,314,594	1,034,071	438,883	595,188
TikTok	9,731,801	522,863	199,710	323,153
Twitch	926, 965	24,466	12,707	10,626
YouTube	25,461,289	643,670	325,597	318,073

#### How the figures were calculated

Service providers told eSafety that the Table 2 figures for Discord<sup>52</sup>, Facebook, Instagram, Reddit, Snap TikTok<sup>53</sup> and YouTube were calculated based on 'logged-in' users – meaning users who accessed the service through an account. Some of the services (Discord, Reddit, TikTok, Twitch and YouTube) could be used to varying degrees without an account. Twitch's total number of end-users included both logged-in and logged-out users (meaning users who hold

<sup>&</sup>lt;sup>50</sup> Reddit stated that is unable to provide an estimate as to how many accounts belong to Australian users between the age ranges of 13 to 15 and 16 to 17 as it does not currently collect age or make inferences based on a user's personal information as reflected in Reddit's privacy policy and principles.
<sup>51</sup> As above.

<sup>&</sup>lt;sup>52</sup> Discord stated that, due to recent updates to its databases, the data from which these metrics have been calculated are still in testing and development as of the date they were provided to eSafety.

<sup>&</sup>lt;sup>53</sup> TikTok stated that the Australian monthly active end-user statistics in the table above relate to users that are logged in to a TikTok account via the mobile app or web browser, and does not include users who may be using TikTok while logged out (which TikTok states is a more limited experience).

accounts but who accessed the service without logging into their account) as well as users without an account<sup>54</sup>.

Additionally, some providers determined active end-users to be any end-users logged into the service at a given time, while others applied minimum time thresholds for an end-user to be considered active. These are examples:

- Discord considered an 'active' user to include a user engaging in a variety of 'activity'
  including sending a message, reacting to a message, starting a call and more. Discord did
  not apply a minimum threshold for an amount of time that a user must spend on
  Discord to be considered 'active'.
- Facebook and Instagram considered an 'active' user to be someone who visited the service through its website or a mobile device in the last 30 days as of the date of measurement.
- Snap considered an 'active' user to be someone who opened their Snapchat app at least once during the month.
- Twitch determined 'active' to be end-users who spent five minutes or more watching Twitch streams during the relevant period across all platforms.

Additionally, the age of users was determined differently by service providers for the purposes of these figures. Discord, Facebook and Instagram, for example, calculated this information based on the age provided by the user at account sign-up. Snapchat calculated this information based on the date of birth provided by the user, either at the point of account sign-up or at a later date. eSafety notes that, if end-users provided an inaccurate date of birth, this would have impacted the accuracy of the number of end-users calculated by the services.

There may also have been some variability in how services determined a user was located in Australia for the purposes of calculating these figures.

Finally, some services noted that there may be discrepancies in the combined age-bracket of 13 to 17, as this number could contain users who were counted as a 13- to 15-years-old and then moved up into the 16 to 17 age bracket due to a birthday (meaning a user may have been double-counted). This variation may account for discrepancies between the figures, as well as with the information children told us.

<sup>&</sup>lt;sup>54</sup> Twitch's figures for the age brackets 13 to 15 and 16 to 17 relate only to logged-in and logged-out users with an account.

Related key finding: Reddit did not know how many children aged 13 to 17 used its service

Reddit was the only service provider that stated it could not provide any information about the number of children using the Reddit service.

Reddit stated that it was unable to provide an estimate of how many accounts belonged to Australian users aged 13 to 15 and aged 16 to 17 (or from 13 to 17 more broadly) because it 'minimizes the data that it collects from users, and consistent with its Privacy Policy does not currently collect age or make inferences based on a user's personal information'. Reddit also stated that 'external third-party research provided insight into the estimated age of its userbase, with the majority of end-users found to be over the age of 18.'

Reddit does not require users to provide a date of birth when creating an account, despite Reddit's User Agreement<sup>55</sup> stating 'No one under 13 is allowed to use or access the Services'.

Meanwhile, 8% of children surveyed aged 13 to 15 reported that they had used Reddit in January to September 2024.

Service providers are expected to take reasonable steps to detect and address breaches of their terms of use under the Basic Online Safety Expectations (sections 14(1A) and 14(2)). There is also a clear expectation that services will provide the number of monthly active end-users on their service – disaggregated into children and adults – to eSafety on request (section 20(5)).

### What does this information tell us?

### Children aged 13 to 15

These figures reported by the services show that there was a significant number of Australian children aged from 13 to 15 with accounts on services (as they self-declared as over 13, they were permitted users). Snapchat and Instagram reported the highest number of users aged 13 to 15, followed by YouTube, TikTok and Facebook.

Interestingly, children aged 13 to 15 reported something slightly different. Children 13 to 15 reported YouTube as the service most likely to have been used (73%), followed by Snapchat (63%), TikTok (62%) and Instagram (56%).

There may be some disparity between what children aged 13 to 15 reported and what services reported due to the way the questions were asked. For example, services provided monthly active end-user statistics, meaning information about the number of users (generally with

<sup>&</sup>lt;sup>55</sup> Reddit (2024), User Agreement, accessed 29 October 2024.

accounts) who actively used the services over the reporting period. Children aged 13 to 15 were asked if they had used services 'this year', and so this could include accessing a service once, or multiple times between January and September 2024. Children aged 13 to 15 also reported using some services with and without their own accounts.

However, it is clear from both children and services that Instagram, Snapchat, TikTok and YouTube were popular with, and likely to be accessed by, the 13- to 15-year-old age group.

#### Children under 13

Despite the services not permitting under-13 users under their terms of use (with the exception of YouTube Family Link accounts), children surveyed between 8 to 12 reported that they were using these services.

Providers of social media services are expected to take reasonable steps, including proactive steps, to detect breaches of their terms of use.<sup>56</sup> The significant number of under-13 children who reported having accessed a social media service in 2024 indicates that there may have been a significant number of breaches of these services' terms of use.

# What tools and technologies were being used by social media services to assess the age of end-users?

There are various points at which social media services could deploy tools and technologies or other processes to assess the age of end-users and to detect users who may be under 13 and not permitted to use the service. For example:

- when a user creates an account ('sign-up')
- proactively, once a user is actively using the service
- when a user attempts to access certain features or content, such as age-restricted content
- when a user is reported by another person as potentially being under the permitted age
  of use
- when a user attempts to change their date of birth.

<sup>&</sup>lt;sup>56</sup> Section 14 of the Online Safety (Basic Online Safety Expectations) Determination 2022.

### What did social media services report?

Related key finding: Varied use of proactive age-detection tools

Some providers noted that their service's apps are age-rated in relevant app stores which prevents (where a child is using an account that has parental controls on) or deters users under a certain age from downloading the app.

Each of the service providers also reported using processes such as reviewing and responding to user reports, human moderators reviewing accounts or reports for indicators of under-13 users, or requiring hard identifiers (for example, a driving licence) in some scenarios. Table 3 focuses on age gates, tools and technology – including those used at the point of sign-up to a service, and proactively once a user is on the service – and other processes are set out throughout this report (including in the individual summaries).

eSafety asked the eight services questions about any tools used for these purposes, and at what point the tools are used.

Table 3: Use of age gates, tools and technology to assess the age of end-users January to July 2024

Service	Did the service use tools to assess the age of endusers?	Name of tools used to assess the age of users	When tools were used (for example, at sign up only, or when reviewing user reports)	Did the service undertake an assessment of the accuracy of these tools at approximating age?
Discord	Yes	<ul> <li>Self-declaration of age via neutral age gate (internal tool)</li> </ul>	• Sign-up	No
		• Age estimation model <sup>57</sup> (internal tool)	<ul> <li>When an account is at least 30 days or older</li> </ul>	No
Instagram and Facebook	Yes	Self-declaration of age     via neutral age gate     (internal tool)	<ul> <li>On sign-up to Instagram and Facebook (account registration)</li> </ul>	No

<sup>&</sup>lt;sup>57</sup> Discord stated that it has an age estimation model that was used at various points between 1 January and 31 July 2024, which operates when an account is at least 30 days or older. Discord stated that this model is not capable of estimating whether a user belongs to a cohort under the age of 13.

		Yoti's facial age     estimation technology	• Yoti was presented as an option to users if they attempted to change their date of birth from under 18 to over 18 <sup>58</sup>	No
		<ul> <li>AI technology (internal adult classifier)<sup>59</sup></li> </ul>	<ul> <li>Continuously from account creation</li> </ul>	No
Reddit	Yes	<ul> <li>Age gate requiring affirmation that the user is 18 or older (internal tool)</li> </ul>	<ul> <li>When a user attempts to view content for mature audience</li> </ul>	N/A <sup>60</sup>
Snapchat	Yes	<ul> <li>Self-declaration of age (internal tool)</li> </ul>	• Sign-up	No
		<ul> <li>Proactive language analysis (internal tool)</li> </ul>	• Continuously <sup>61</sup>	Yes <sup>62</sup>
		<ul> <li>Inferred age model (internal tool)<sup>63</sup></li> </ul>	<ul> <li>Continuously</li> </ul>	Yes <sup>64</sup>
TikTok	Yes	<ul> <li>Self-declaration of age via neutral age gate (internal tool)</li> </ul>	<ul> <li>Sign up</li> <li>When an enduser appeals an account ban or other enforcement action</li> </ul>	No <sup>65</sup>

<sup>&</sup>lt;sup>58</sup> If a user attempts to change their age from under 18 to over 18, Meta allows the user to assess their age through Yoti's facial estimation technology. If a user attempts to change their date of birth to a date which indicates they are under 13 (which results in the account being checkpointed), Meta requires a user to verify their age through ID verification. If a user attempts to change their age from over 18 to under 18, Meta allows the user to verify their age through ID verification. Meta provides different options for ID verification, including photo IDs issued by the government and from non-government organisations. If a user does not provide adequate documentation within a specified period of time, their account and all other accounts in the same Accounts Centre is deleted.

<sup>&</sup>lt;sup>59</sup> Meta stated that it used AI technology in the form of an adult classifier, continuously from account creation to detect whether the user is likely a teen (13 or older) or an adult. Meta's adult classifier does not detect whether a user is under the age of 13. Meta provided a link to the Facebook website which sets out more information about this AI technology: Facebook, 22 June 2022, 'How Meta Uses AI To Better Understand People's Ages on Our Platform', <a href="https://tech.facebook.com/artificial-intelligence/2022/6/adult-classifier/">https://tech.facebook.com/artificial-intelligence/2022/6/adult-classifier/</a>, accessed 28 October 2024.

<sup>60</sup> Reddit stated that the age gate for content for mature audiences does not approximate age.

<sup>&</sup>lt;sup>61</sup> Snap reported that it has utilised proactive language analysis to proactively detect indicators that a user is under 13 on public profiles since June 2024.

<sup>&</sup>lt;sup>62</sup> More information about the results of Snap's assessment of its proactive language analysis tool is set out on page 86.

<sup>&</sup>lt;sup>63</sup> Snap reported that it uses an inferred age model to detect users aged 13 to 18 when applying certain advertising, content and feature restrictions. More information is set out on page 87.

<sup>&</sup>lt;sup>64</sup> More information about the results of Snap's assessment of its inferred age model is set out on page 87.

<sup>&</sup>lt;sup>65</sup> TikTok answered 'No' to this question, however, notes that it does continually assess the combined accuracy of its tools in preventing under-13's from creating accounts on the service.

		<ul> <li>Proactive language analysis model (internal tool)<sup>66</sup></li> </ul>	• Continuously	Yes
		Al profiling and inference models, namely internal proactive age inference models used for under-13s and under-18s respectively.	<ul> <li>a user uploads a video to their account</li> <li>a user hosts a LIVE</li> </ul>	Yes
		<ul> <li>Yoti's 'Facial Age         Estimation' tool         (external tool provided         by a third party)</li> </ul>	<ul> <li>When a user appeals their account ban and elects to use facial estimation to assess their age</li> </ul>	Yes
		• Jumio's 'ID Check' (external tool provided by a third party) <sup>68</sup>	<ul> <li>when a user appeals their account ban and elects to use 'ID Check' to assess their age</li> </ul>	Yes
Twitch	Yes	Self-declaration of age during sign-up (internal tool)	<ul> <li>On sign-up and</li> <li>At the point of monetisation on-boarding</li> </ul>	No
		<ul> <li>Text analysis tools<sup>69</sup>         (internal tools)</li> </ul>	• Continuously	No
		<ul> <li>Audio analysis tools<sup>70</sup> (internal tools)</li> </ul>	• Continuously	Yes <sup>71</sup>

<sup>&</sup>lt;sup>66</sup> TikTok stated that it used proactive language analysis tools continuously to proactively detect users who may be under 13.

<sup>67</sup> TikTok stated that it uses AI profiling and inference models (which use several indicators including but not limited to facial, voice, text and language age estimation) to infer a user's likely age group, including if they may be under 13. 68 TikTok stated that Jumio provides a third-party ID authentication service ('ID Check') which involves the user uploading government-issued photo ID along with a selfie holding that ID. Jumio's ID Check checks that IDs submitted are in the correct format according to the relevant ID type. TikTok stated that TikTok (not Jumio) ensures that the ID provided by a user is the same as the user depicted in the selfie.

<sup>69</sup> Twitch stated that it used text analysis tools to detect text indicative of under-13 users or text indicative of an attempt to harm under-13 users (for example, child sexual exploitation and abuse).

<sup>&</sup>lt;sup>70</sup> Twitch stated that it used audio analysis tools to evaluate stream audio to determine whether a broadcaster may be under 13.

<sup>&</sup>lt;sup>71</sup> Twitch provided information regarding the precision of this tool at accurately identifying under-13 accounts. Twitch also stated that all reports, including those generated by this tool, are reviewed by human moderators.

		Behavioural analysis tools <sup>72</sup> (internal tools)	• Continuously	Yes <sup>73</sup>
		<ul> <li>Traffic indicators<sup>74</sup>         (internal tools)</li> </ul>	<ul> <li>Continuously</li> </ul>	Yes <sup>75</sup>
		<ul> <li>Processes for changing age<sup>76</sup> (internal)</li> </ul>	<ul> <li>When a user attempts to change their age</li> </ul>	No
YouTube	Yes	<ul> <li>Self-declaration of age via neutral age gate (internal tool)</li> </ul>	<ul> <li>On sign-up to YouTube</li> </ul>	No <sup>77</sup>
		Age     estimation/inference     model (internal tool)	• After a user signed-up to YouTube where a user enters a birthdate indicating they are 18+ and the user attempts to access agerestricted content <sup>78</sup>	No
		<ul> <li>Private ID selfie age- estimation</li> </ul>	<ul> <li>Offered as an option to assess that</li> </ul>	No

<sup>&</sup>lt;sup>72</sup> Twitch stated that it used behavioural analysis tools to identify certain categories and behaviours associated with a higher proportion of under-13 users to apply additional account security and verification, as well as to detect individuals who may be under 13, or may pose a risk of child sexual exploitation and abuse activity.

<sup>&</sup>lt;sup>73</sup> Twitch provided information regarding the precision of this tool at accurately identifying under-13 accounts. Twitch also stated that all reports, including those generated by this tool, are reviewed by human moderators.

<sup>&</sup>lt;sup>74</sup> Twitch stated that it used models to report streamers as suspected of being under 13 and chatters as suspected for CSEA for moderation review based on traffic from certain referrer sites.

<sup>&</sup>lt;sup>75</sup> Twitch provided information regarding the precision of this tool at accurately identifying under-13 accounts. Twitch also stated that all reports, including those generated by this tool, are reviewed by human moderators.

<sup>&</sup>lt;sup>76</sup> Twitch stated that it had safety operations interventions in place based on certain actions which could be indicative of under-13 users – for example, change of age upon application for monetisation – and that Twitch may perform a check of identification documents if appropriate.

<sup>&</sup>lt;sup>77</sup> Google stated that it does undertake periodic reviews of its age assurance tools and processes which may have occurred outside of the reporting period of January to July 2024.

<sup>&</sup>lt;sup>78</sup>Google stated that users who declare their age as between 13 to 17 are always blocked from accessing age restricted content on YouTube. Users who enter a birthdate indicating they are over 18 are not able to access restricted content unless and until Google's age assurance model is sufficiently confident that the user is aged over 18. If the model is unable to establish that a viewer is above the age of 18, Google will request that they provide a valid ID or credit card to verify their age. Google stated that it applies an age inference model to assess the likelihood that a user is actually over 18 before allowing access to age-restricted content on YouTube. The inference model is a **machine learning** model that utilises the online activity stored with the user's Google Account, in accordance with a user's settings. If the age inference model is unable to infer (with sufficient confidence) that the user is over 18, the user must provide additional evidence to verify that they are an adult, by providing either an image of their official ID document, allow for a credit card authorisation, or confirm their age via selfie-age estimation, before they can access restricted content.

Behind the screen: Transparency report

		the user is 18 or older when attempting to access age restricted content and YouTube's age estimation/ inference model has been unable to infer 18+ with sufficient confidence	
•	Classifiers <sup>79</sup> (internal tool)	• Continuously	No
•	Vouching	• For K-12 education users, a trusted account must 'vouch' for the user at the time of account creation	No

<sup>&</sup>lt;sup>79</sup> Google stated that YouTube used classifiers to find signals on YouTube channels that indicate that the account operating the channel may be owned by users under 13.

### What does this information tell us?

Related key finding: Reliance on self-declared ages

There are tools and technologies which are being used to assess the age of end-users. This includes both proactive detection tools applied continuously (such as language analysis technology, age estimation models and classifiers) as well as tools such as facial estimation technology which can be used at certain points in time (such as when a specific user is required to prove their age in order to appeal an account suspension or change their previously self-declared date of birth).

However, at the first point of access to an account – when a user signed-up to a service – all services (except Reddit) relied on a truthful self-declaration of age (described either as an 'age gate' or providing date of birth for account registration). There is clear evidence that children under 13 are getting around this barrier by providing a false date of birth – for example, it is undisputed that all services banned a number of children for being under 13. If a child provides an age or birthdate which indicates they are at least 18, and providers do not detect this, any child- or teen-safety measures which the service has developed may not be implemented for that user.

7 out of 8 services used an age estimation model or AI technology to estimate the age of users once they are using the service – Discord, Instagram, Facebook, Snapchat, TikTok, Twitch and YouTube.

These, and other tools, were calibrated to detect under-13 users, children aged 13 to 17, and adults (18+).

To detect under-13 users:

- TikTok, Twitch and Snapchat used proactive language analysis technology.
- YouTube used classifiers on channels.
- TikTok applied AI and facial age estimation by using age inference models.
- Twitch also used audio, behavioural and traffic analysis tools.

To detect children aged 13 to 17, or adults (18+), Discord, Facebook, Instagram, TikTok, Snapchat and YouTube used age inference models. TikTok also used language analysis technology.

Some services used tools and technology at specific points in time. For example, Facebook and Instagram allowed a user who wishes to change their date of birth from under 18 to 18 or older to use a facial estimation tool named Yoti to estimate their age.

This information about the use of tools and technologies can be contrasted with the insights from children aged 8 to 12 about their experiences of their accounts being detected as under-13 and being shut down.

# What steps did services take when they found users who may have been under 13?

Services reported taking a variety of steps when tools, technologies and processes assessed that an end-user was not the age they declared and may have been under 13.

### What did social media services report?

The steps that social media services reported having in operation from 1 January to 31 July 2024 are set out in Table 4.

#### Table 4

Service	Steps taken by services
Discord	Discord would immediately remove users and ban user accounts when it had indicators that a user was under 13.
Instagram and Facebook	<ul> <li>The steps taken depended on the tool used by Facebook or Instagram to assess the age of the user.</li> <li>Meta had put in place technical safeguards in relation to the age gate at registration. For example, if a user entered a date of birth indicating they were under 13, they would receive a generic error message. If a user made two consecutive attempts to register with a date of birth indicating they were under 13, Meta would prevent the user from attempting to register for a period of 12 hours. Meta would require ID age verification in certain circumstances, such as when a user attempted to change their date of birth to under 13.</li> </ul>
	• If a user opted to use Yoti to assess their age, and if Yoti estimated a user was under 13, the user would be placed in a checkpoint, their account would be suspended (preventing them from accessing it) and their profile would not be visible to others. The user had the opportunity to appeal and recover account access if they could provide adequate documentation that they were at least 13 (this could be a government issued photo ID or nongovernment ID). If adequate documentation was not provided within a specified period of time, the account would be deleted (along with all other accounts in the same Accounts Center – for example, if the user had both a Facebook and an Instagram account).
	<ul> <li>If an account was referred to a human reviewer for evaluation of potential underage use, and the human reviewer found sufficient signals that the user may be under 13, the user would be immediately placed in an age checkpoint. Once checkpointed, the user would follow the same protocol as set out in the previous point, including by being required to provide adequate</li> </ul>

ID documentation showing that the user was at least 13. Meta stated that if reviewers were unsure of whether a user was under 13 based on review of the account media, they were instructed to default to a finding that the user was underage and place them in a checkpoint.  • If an account was placed in an age checkpoint, Meta would simultaneously suspend all other accounts that were in the same Accounts Centre (for example if the user had both a Facebook account and an Instagram account).  • Meta's Al technology would not detect whether a user was under 13 – instead it would detect whether a user was likely to be a child aged 13 to 17 or an adult (18 or older).  Reddit  Although Reddit did not use proactive tools to assess the age of end-users, Reddit stated that if Reddit determined (by other means) that an account was created by someone under 13, Reddit would ban the user from the service and take steps to detect and remove any associated accounts belonging to the same user from the service.  Snapchat  Snap would terminate the accounts of users who were identified as under 13, and the user data would be deleted.  If TikTok's proactive detection tools flagged that a user may have been under 13, TikTok's underage moderation team would complete a manual review of the account.  If TikTok received a user report that a user may have been under 13, the reported account would first be assessed by TikTok's models to determine the likelihood at hit is belonged to an underage user, the report would be discarded. TikTok stated that it had implemented this process for user reports because user reports were not as accurate or reliable as TikTok's proactive detection models. If TikTok's underage moderation team for a manual review.  Human moderators may have also detected indicators that a user was under 13 when reviewing content for a different purpose (such as a report about 'hate and harassment' which was then reviewed against TikTok's Community Guidelines). Human moderators would transfer account would be referred to TikT		
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party or automated – would be escalated for human review. Upon review, those users determined to be potentially under 13 would have their accounts suspended indefinitely.  YouTube  If an Australian user created an account but Google had reason to believe the user might be under 13, the account would be flagged and the user would be required within 14 days to:	TikTok	TikTok's underage moderation team would complete a manual review of the account.  If TikTok received a user report that a user may have been under 13, the reported account would first be assessed by TikTok's models to determine the likelihood that it belonged to a user under 13. TikTok reported that if there was a low likelihood that the account belonged to an underage user, the report would be discarded. TikTok stated that it had implemented this process for user reports because user reports were not as accurate or reliable as TikTok's proactive detection models. If TikTok's models assessed the likelihood as high, the account would be referred to TikTok's underage moderation team for a manual review.  Human moderators may have also detected indicators that a user was under 13 when reviewing content for a different purpose (such as a report about 'hate and harassment' which was then reviewed against TikTok's Community Guidelines). Human moderators would transfer accounts of suspected under 13 users to the underage moderation team for review.  A manual review by human moderators would involve a review of a user account's bio, nickname or handle, the user's videos and video captions, and the user's uploaded videos, having regard to relevant indicators of age (such as facial/physical features, express age disclosures, school uniform clothing).  If TikTok's human moderators determined that the account holder was likely to be under 13, the account would be immediately banned and the user would be notified. TikTok would take certain steps to prevent the banned user from re-registering, which eSafety has chosen not to publish. TikTok stated that users could appeal the
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obtain <b>parental consent</b> and add supervision to their account, or	YouTube	might be under 13, the account would be flagged and the user would be required within 14 days to:
		obtain parental consent and add supervision to their account, or

 provide proof that they were above the age of consent, with a Government issued ID card or credit card.

If the user failed to either add supervision or prove that they were at least 13, the account would be permanently disabled and deleted.

### What did children say?

Related key finding: Few children have had their social media accounts shut down by services

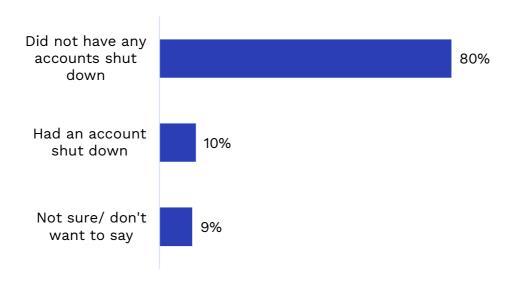
From January to September 2024 most (80%) of the surveyed children aged 8 to 12 with a social media account(s) had not experienced their account(s) being shut down due to their age.

Among the 36% of surveyed children aged 8 to 12 who had used social media from January to September 2024, and who had a social media account(s), a minority (10%) reported that their account had been shut down by the service during the period because they were too young to be using it (Figure 5).

However, it is possible that some had one or more accounts shut down previously. It's also possible that some had YouTube accounts that were connected to an adult account through Family Link and so were permitted.

Therefore, while these findings provide a preliminary indication of the percentage of children aged 8 to 12 who may have had a social media account shut down, further research is required.

Figure 5: Account shutdowns on social media services



**Source**: D6a Since the beginning of this year, have you had an account shut down by a website or app because you were too young to be using it? This means that you couldn't access it anymore.

Base: 306 children aged 8 to 12 who currently had at least one account on a social media service.

Note: Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube and Discord.

### What does this information tell us?

The responses to this question revealed that each of the service providers had processes in place to remove users who were identified as being under 13. This was corroborated by the number of accounts banned by service providers due to the account holder being under 13 (see page 75).

Additionally, many services had an appeals process that allowed users to provide evidence or additional assurance that they were of the permitted age to use the service. This may have involved using age assurance, such as the Yoti age estimation tool, or requiring evidence such as an ID card.

This indicates to eSafety that providers did take steps to remove under-13 users from their services, and that various steps may first be required to verify reports or flags of potential under-13 users.

It also highlights the value of deploying a combination of measures to assess the age of users – including proactive detection tools and human moderator review, as well as additional verification requirements where needed for certainty.

# Did the services undertake any research to develop or implement age assessment tools?

Services were asked if they undertook any research to develop or implement tools to assess the age of end-users between 1 January and 31 July 2024.

### What did social media services report?

The responses are set out in Table 5.

Table 5

Service	Yes/No	Aims of the research
Discord	No	N/A
Facebook	Yes	To expand Meta's age inference technology.
Instagram	Yes	To expand Meta's age inference technology.
Reddit	Yes	<ul> <li>To assess potential third-party age assurance vendors and solutions.</li> </ul>
Snapchat	Yes <sup>80</sup>	<ul> <li>To investigate the role that infrastructure such as app stores and device operating system accounts may be able to play in providing an industry-wide solution to age verification through device signals.</li> </ul>
TikTok	Yes <sup>81</sup>	<ul> <li>To research new vendors that may be able to improve TikTok's provision of existing age assurance tools, and to research vendors that may be able to provide new means for verifying the age of account holders.</li> </ul>
		<ul> <li>To establish a global multi-stakeholders initiative on age assurance.</li> </ul>
		<ul> <li>To identify and evaluate new opportunities for TikTok's proactive detection models.</li> </ul>
		<ul> <li>To improve user safety and the digital well-being of TikTok's users.</li> </ul>
Twitch	Yes	<ul> <li>To assess the viability and effectiveness of additional tools in determining whether users may be under 13.</li> </ul>
YouTube	Yes	<ul> <li>To assess the suitability of potential new age verification processes for end-users of YouTube.</li> </ul>

<sup>&</sup>lt;sup>80</sup> Although Snap reported that it undertook research, the examples provided by Snap of research it undertook do not relate to developing or implementing tools on the Snapchat service.

<sup>&</sup>lt;sup>81</sup> More information on the research undertaken by TikTok is set out on page 93.

### What does this information tell us?

Related key finding: Active efforts in age assessment research

The responses to this question revealed that during the reporting period most services undertook some research towards improving existing age assessment tools or potentially implementing and developing new or additional tools to assess the age of end-users on their service. This is positive to see.

Snapchat undertook research about the role that other services could play in assessing the age of users.

eSafety notes some services (Snapchat, TikTok, Twitch and YouTube) had already implemented some tools or technology on their services to detect under-13s, and other services (Facebook and Instagram) had implemented tools or technology to assess other age brackets. Undertaking research to assess and consider additional or new options is a positive step for all of these services and especially Reddit which did not use any tools or technology to assess the age of users (except to rely on users to truthfully self-identify as under the age of 18 when accessing 'mature content'). eSafety acknowledges that although Discord did not undertake any research in the time period, it did use an age inference model to assess whether users were children aged 13 to 17, or adults (18+).

TikTok's research (further detailed on page 93) demonstrates a commitment to improving its processes in relation to age assurance. Alongside data science teams working to improve the performance of its tools, TikTok also conducted policy experiments and training with its human moderators to develop its policies on enforcement against under-13 users and users aged 13 to 17. TikTok stated that this approach can help identify which signals are most reliable, and to identify which signals need to be better understood by moderators or more aptly explained in TikTok's policies. Similarly, Google also showed a commitment to improving its tools for age assurance purposes. In addition to research (set out in table 5), it also undertook a pilot programme to explore using a Google-specific selfie tool for age assurance purposes (rather than relying on a third party tool). Google also stated that it undertook 'inclusive testing' research in Australia between June and July 2024 on its use of selfies for age verification, which involved exploring the perceptions of participants from historically marginalised ethnic groups about using selfies for age estimation.

Identifying or estimating the age of end-users is important, not only for the detection and removal of users under the permitted age of the service, but also to provide tools and protections for permitted users under 18. The use of tools and technologies can greatly assist in estimating or assessing the age of an end-user, particularly when truthful self-declaration of age is relied on at the point of sign-up. It is positive to see that some services actively invested

in research with a view to considering suitability for deployment on the service. eSafety encourages service providers to continually seek out new and improved safety measures, age assurance and interventions.

# Did the services undertake any research to estimate the number of underage users?

eSafety asked the social media services if they had undertaken any research between 1 January and 31 July 2024 into estimating the total number of end-users that were under 13 on the service. If a service answered yes, they were also asked to detail what the studies and research entailed, the estimated total number of end-users under 13 on the service and what changes were made to the service as a result of the research.

### What did social media services report?

Twitch and TikTok were the only social media services that undertook any research during the reporting period to estimate the total number of end-users under 13 on the service.

#### Table 6

50

Service	Did the service undertake any research between 1 January and 31 July 2024 to estimate the total number of end-users under 13 on the service? (Y/N)
Discord	No
Instagram	No
Facebook	No
Reddit	No
Snapchat	No
TikTok	Yes
Twitch	Yes
YouTube	No

### Research undertaken by TikTok

- TikTok stated it undertakes ongoing research and analysis to estimate the number of end-users under 13 on the service.
- TikTok reported its expert internal teams ran targeted research to evaluate underage accounts that may not have been initially identified by the models (this is known as the pass-through rate). By interrogating these cases, TikTok could identify areas for model

refinement and ensure its proactive detection systems remained effective. Any users identified as under 13 were promptly removed from the service.

- Through these processes, TikTok stated it was able to detect underage users more effectively while also using the findings to generate scalable insights into broader model performance and areas for optimisation.
- Although TikTok was not able to provide an estimated total number of children under the age of 13 using the TikTok service, TikTok stated that in quarter 3 of 2024, TikTok removed 24,304,797 users globally for suspected underage account ownership. Approximately 90,000 of these were Australian accounts. TikTok stated these figures represent the number of underage users who may have bypassed TikTok's neutral age gate (self-declaration of age at account sign-up) but were subsequently identified by TikTok's age assurance measures and removed from the platform.

#### Research undertaken by Twitch

- Twitch stated that samples of livestreams on the Twitch service were manually reviewed by human reviewers to assess (age estimate) whether the streamer was under 13.
- Twitch reported its research revealed a certain percentage of streams that were estimated to include a streamer under the age of 13 (globally, not just in Australia).
- Twitch also reported that, since the conclusion of its research, it had launched new safety functions such as audio analysis (although Twitch stated this was not done as a direct result of Twitch's research regarding potential under-13 streamers).
- Twitch also reported it has continued to engage with regulatory and public interest organisations to explore effective age assurance mechanisms and determine an appropriate standard.

### What did children say?

As set out above on page 31, 80% of 8- to 12-year-old children surveyed by eSafety said they had used social media in 2024.

- 68% reported using YouTube<sup>82</sup>
- 31% reported using TikTok
- 19% reported using Snapchat

<sup>&</sup>lt;sup>82</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

- 13% reported using Instagram
- 12% reported using Facebook
- 8% reported using Discord
- 3% reported using Twitch
- 3% reported using Reddit.

### What does this information tell us?

Related key finding: Lack of data on under-13 users for some services

It is clear children under 13 were using these eight social media services, although children under 13 may have reported using a service with or without an account, or by using someone else's account.

It is also clear some services are using tools and processes at different points to detect and assess the age of end-users.

eSafety considers it is important for services to understand the potential scale of active users on their services who are under the permitted age of 13. Such information provides useful insights into the effectiveness of existing tools and processes at detecting the number of under-13s on the service.

It is positive to see TikTok and Twitch undertook research to better understand how many users may be under 13. It is discouraging that other services did not undertake research to this effect in the reporting period of January – July 2024.

Research should be undertaken in conjunction with the use of proactive detection tools and other processes.

## How were children accessing social media services?

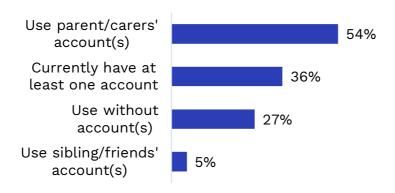
It is also helpful to understand in more detail how children are accessing social media services. eSafety's <u>Children and Social Media Survey</u> asked children aged 8 to 12 about whether they were using social media services with their own account, or whether they were accessing some services without an account or using someone else's account.

This information is useful in understanding where certain age-assessment interventions (such as tools and technologies or other processes) are most likely to be effective.

### What did children say?

Children aged 8 to 12 surveyed reported using social media services both with and without their own account over the period (Figure 6).

Figure 6: Children aged 8 to 12 access to social media services



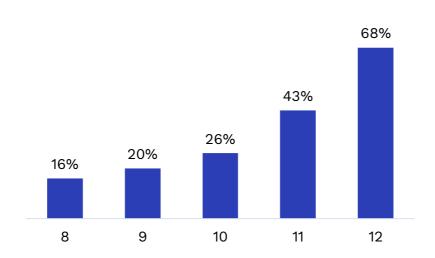
**Source**: D1 Below are the websites and apps you said you have used since the start of the year. Some need a profile or account to be set up first. To do this you might have to choose a username, password, and maybe a picture, for the account. Do you currently have your own profile or account on any of the following websites or apps? **Base**: 844 children aged 8 to 12 who had used at least one social media service since the beginning of the year. **Note**: Percentages do not sum to 100% due to participants reporting about their access to and accounts on multiple services. Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube and Discord.

Among the surveyed children aged 8 to 12 who had used social media over the survey period:

- more than 1 in 3 (36%) said they had their own account on at least one of these services
- more than half (54%) said they had used their parent's or carer's account to access at least one of these services
- more than 1 in 4 (27%) said they had used one or more of these services without an account
- 1 in 20 children (5%) said they had used a sibling's or friend's account to access at least one of these services.

The proportion of surveyed children aged 8 to 12 who had used social media over the survey period and had at least one social media account of their own, increased with age (Figure 7). Among the 8-year-olds in this group, fewer than 2 in 10 (16%) said they had at least one social media account. This increased to almost 7 in 10 (68%) of the 12-year-olds.

Figure 7: Accounts on social media services by age from January to September 2024



**Source**: D1 Below are the websites and apps you said you have used since the start of the year. Some need a profile or account to be set up first. To do this you might have to choose a username, password, and maybe a picture, for the account. Do you currently have your own profile or account on any of the following websites or apps? **Bases**: Range from 148-202 8 to 12-year-olds who had used at least one social media service since the beginning of the year.

Note: Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube and Discord.

How children aged 8 to 12 used social media differed across services (Table 7). Surveyed children aged 8 to 12 who had used Discord since the beginning of the year were particularly likely to have their own Discord account (78%). Most children aged 8 to 12 who had used Snapchat since the beginning of the year also had their own Snapchat account (67%), while just under a quarter (24%) had used their parent's or carer's Snapchat account. Just over half the surveyed children aged 8 to 12 who had used Facebook or Instagram since the beginning of the year had their own account on these services (54% and 51%, respectively), while over a third had used their parent's or carer's Facebook (36%) or Instagram (37%) account. Among TikTok users, a similar proportion had their own account (37%) or used their parent's or carer's account (36%), while a significant minority (17%) used TikTok without an account. Conversely, of the surveyed children aged 8 to 12 who had used YouTube<sup>83</sup> since the beginning of the year, most used their parent's or carer's account (48%) or used the service without an account (27%), with fewer children aged 8 to 12 having their own YouTube account (19%).

<sup>&</sup>lt;sup>83</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

Table 7: Accounts on social media services from January to September 2024

Social media service		%
YouTube	Have own account	19
	Use or look at parent's or carer's account	48
	Use or look at sibling's or friend's account	2
	Use this website or app without an account	27
	Don't use this website or app anymore	1
	Not sure/ don't want to say	3
Base: Children aged 8 to 12 who ha	ave used YouTube since beginning of year.	710
TikTok	Have own account	37
	Use or look at parent's or carer's account	36
	Use or look at sibling's or friend's account	6
	Use this website or app without an account	17
	Don't use this website or app anymore	3
	Not sure/ don't want to say	1
Base: Children aged 8 to 12 who ha	ave used TikTok since beginning of year.	326
Snapchat	Have own account	67
	Use or look at parent's or carer's account	24
	Use or look at sibling's or friend's account	3
	Use this website or app without an account	2
	Don't use this website or app anymore	2
	Not sure/ don't want to say	2
Base: Children aged 8 to 12 who ha	ave used Snapchat since beginning of year.	198
Instagram	Have own account	51
	Use or look at parent's or carer's account	37
	Use or look at sibling's or friend's account	5
	Use this website or app without an account	3
	Don't use this website or app anymore	1
	Not sure/ don't want to say	2
Base: Children aged 8 to 12 who ha	ave used Instagram since beginning of year.	134
Facebook	Have own account	54
	Use or look at parent's or carer's account	36
	Use or look at sibling's or friend's account	4
	Use this website or app without an account	3
	Don't use this website or app anymore	1
	Not sure/ don't want to say	2
Base: Children aged 8 to 12 who ha	ave used Facebook since beginning of year.	122

Discord	Have own account	78
	Use or look at parent's or carer's account	9
	Use or look at sibling's or friend's account	4
	Use this website or app without an account	3
	Don't use this website or app anymore	3
	Not sure/ don't want to say	4
Base: Children aged 8 to 12 who h	79	

**Source**: D1 Below are the websites and apps you said you have used since the start of the year. Some need a profile or account to be set up first. To do this you might have to choose a username, password, and maybe a picture, for the account. Do you currently have your own profile or account on any of the following websites or apps? **Note:** Bases for Reddit and Twitch too low (n < 50) to report separately.

### What does this information tell us?

Related key finding: A variety of access methods for children under 13

It is clear children were accessing social media in a myriad of ways. Different steps and interventions may be needed to address different points of access. Online safety education across the community is also important to support a holistic approach to the issue of children accessing social media.

### Children under 13 accessed social media services with their own account

• eSafety considers there is more work to do so that children are prevented from creating accounts with social media services when they are below the permitted age of use.

### Children under 13 accessed social media through their parent or carer's account, or a sibling or friend's account

- This information indicates potential difficulty for services to detect whether the person using an account (for example, a child under 13) is the same person who set up the account (a parent or carer, or an older sibling or friend for example).
- There is a need to engage with parents and carers to ensure the decisions they make about their children's access to social media services are done in a way that respects the service's terms of use and protects and empowers children to engage and explore safely online.

• This also highlights the need for a whole-of-community approach and the importance of online safety education for children, to support them regardless of how and when they access social media.

### Children under 13 accessed social media without an account

 eSafety notes that generally, access to certain content and features may be more limited where a user is not logged in to an account. However, age-based safety and privacy tools, features and settings may also not be applied to users who access a service without an account. This is an important issue to consider further.

### What was revealed about parental consent?

### What did services report?

Social media services were asked if they had parental consent processes in place on their services. Parental consent refers to when an adult, generally one who is age-assessed by a service, provides confirmation that a child is of a certain age. Parental consent could be sought at various points in time – for example, at sign-up, when an account is flagged as being underage, or following an account suspension/ban.

Table 8

Service	Did the service have a parental consent process in place to verify the age of account holders?	If yes, when was parental consent asked of account holders on the service?	If yes, what information did the service collect and/or require to prove the relationship between the parent or guardian and the child who held the account?
Discord	No	N/A	N/A
Facebook	No	N/A	N/A
Instagram	No	N/A	N/A
Reddit	No	N/A	N/A
Snapchat	No	N/A	N/A
TikTok	Yes	TikTok stated that if a user is banned for being under 13 and appeals the ban, the user can select an option which involves	Option 1:      Email address of parent/guardian      Parent/guardian's confirmation of the end-user's age

		parental/guardian involvement.  • Parents/guardians may be asked to provide information to verify the age of the suspected under 13 user.	<ul> <li>Credit card information</li> <li>Option 2:</li> <li>Photo with parent/guardian</li> </ul>
Twitch	Yes	<ul> <li>If the end-user had been banned from Twitch for signing up to the service when they were under 13, but is now 13 or older.</li> </ul>	Signed affidavit
YouTube	Yes <sup>84</sup>	<ul> <li>At sign-up</li> <li>When an account is suspended/banned and the user wished to appeal</li> <li>When Google suspects an account holder is under 13</li> </ul>	Credit card, and verification via Internal Account Signals

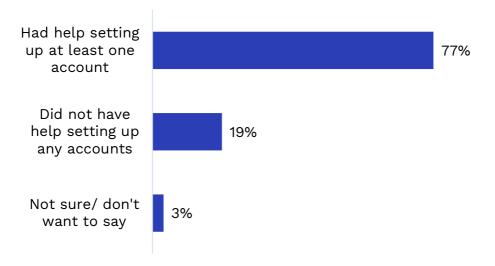
### What did children say?

### Most children had help setting up their social media accounts

Among the surveyed children aged 8 to 12 who had at least one social media account, almost 4 in 5 (77%) had help setting up at least one of their accounts (Figure 8).

<sup>&</sup>lt;sup>84</sup> More information about Google's response to this question is at page 97.

Figure 8: Assistance setting up accounts on social media services



Source: D4a Did someone help you to set up your account?

Base: 306 children aged 8 to 12 who had at least one account on a social media service.

Note: Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube and Discord.

The proportion of children aged 8 to 12 who had help setting up at least one of their accounts decreased with age – almost 8 in 10 (79%) 11-year-olds, compared with almost 7 in 10 (68%) 12-year-olds. 85

Figure 9 shows that surveyed children aged 8 to 12 who had YouTube<sup>86</sup> or Facebook accounts were especially likely to have had help setting up these accounts (74% and 70% respectively). Over 6 in 10 (61%) who had an Instagram account said that someone helped to set up their account, with a similar percentage of Discord (60%) and Snapchat (59%) account holders having received help to set up their accounts. Just 1 in 2 (50%) surveyed children aged 8 to 12 who had a TikTok account reported that someone had helped them to set up their account.

 $<sup>^{85}</sup>$  Bases for 8-, 9- and 10-year-old children too low (n < 50) to report separately.

<sup>&</sup>lt;sup>86</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

YouTube 74% 21% 5% Facebook 70% 30% 61% Instagram 36% 3% Discord 60% 40% Snapchat 59% 37% 4% TikTok 50% 47% 3% ■ Had help ■ Did not have help ■ Not sure/ don't want to say

Figure 9: Assistance setting up accounts on social media services

**Source**: D4a Did someone help you to set up your account?

Bases: Range from 62 to 136 children aged 8 to 12 who had an account on YouTube, Facebook, Instagram, Discord,

Snapchat or TikTok.

**Note:** Bases for Reddit and Twitch too low (n < 50) to report separately.

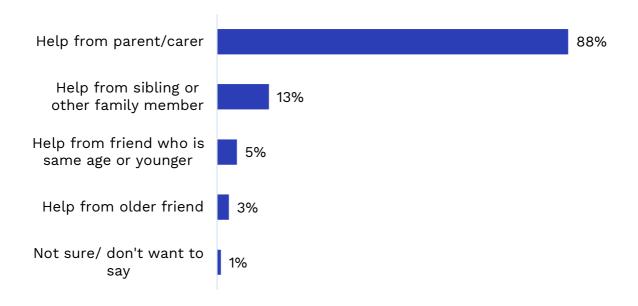
### Children aged 8 to 12 are most likely to receive help from parents to set up social media accounts

Surveyed children aged 8 to 12 were most likely to receive help from their parent or carer to set up their social media account(s) (Figure 10).

Among surveyed children aged 8 to 12 who had a social media account and had help setting up at least one of those accounts:

- almost 9 in 10 (88%) said their parent or carer helped them to set up at least one of their social media accounts
- just over 1 in 10 had help from a sibling or other family member (13%)
- a small proportion had help from older friends (3%) or friends who were the same age or younger (5%).

Figure 10: Sources of assistance for children aged 8 to 12 setting up social media accounts



**Source**: D4b Who helped you set up your account?

**Base**: 237 children aged 8 to 12 who had at least one account on a social media service and had help setting up at least one of these accounts.

**Note:** Percentages do not sum to 100% due to participants reporting about help setting up accounts on multiple services and being able to select multiple responses. Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube and Discord.

Figure 11 shows that children aged 8 to 12 were particularly likely to have had help from a parent or carer to set up a YouTube account. Among those who had a YouTube account and had help setting up their account:

- more than 9 in 10 (93%) said it was their parent or carer who helped them
- a small proportion (5%) said they had help from a sibling or other family member apart from their parent.

Google permits children under 13 to have their own Google account and use YouTube if their account is connected to an adult account through Family Link.<sup>87</sup> Therefore, some parents may have helped their children set up YouTube accounts to connect the child's account to their own.

Among surveyed children aged 8 to 12 who had a Snapchat account and had help setting up that account:

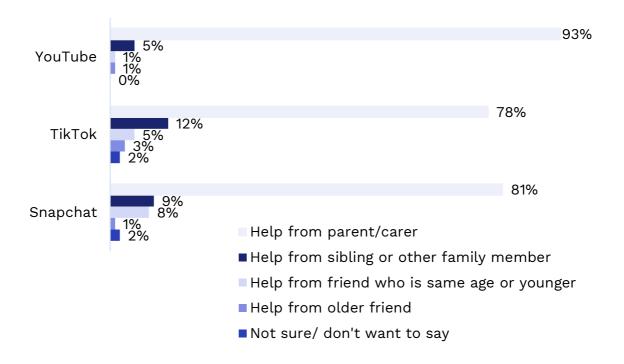
<sup>&</sup>lt;sup>87</sup> Google (n.d)., 'Get started with Family Link', accessed 28 October 2024

- just over 8 in 10 (81%) had received help from their parent or carer
- fewer than 1 in 10 had received help from a sibling or other family member apart from their parent (9%) or from a friend who was the same age or younger (8%).

Among surveyed children aged 8 to 12 who had a TikTok account and had help setting up their account:

- just over 3 in 4 (78%) had help from their parent or carer
- just over 1 in 10 (12%) had help from a sibling or other family member apart from their parent
- a small proportion (5%) had help from a friend who was the same age or younger.

Figure 11: Sources of assistance for children aged 8 to 12 setting up YouTube, TikTok, or Snapchat accounts



**Source**: D4b Who helped you set up your account?

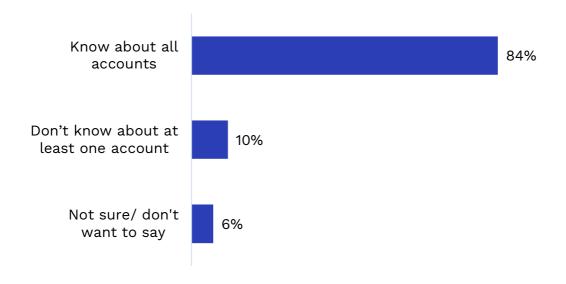
**Bases**: Range from 59 to 101 children aged 8 to 12 who had an account on YouTube, TikTok or Snapchat and had help setting up their account(s).

**Note:** Percentages may not sum to 100% due to participants being able to select multiple responses. Bases for Instagram, Facebook, Discord, Reddit and Twitch too low (n < 50) to report separately.

### Most parents know about their children's social media accounts

Among surveyed children aged 8 to 12 who had at least one social media account, over 8 in 10 (84%) reported that their parent or carer knew about these accounts (Figure 12), while 1 in 10 (10%) said their parent or carer didn't know about at least one of these accounts, and a small proportion (6%) weren't sure or didn't want to say.

Figure 12: Parental knowledge of social media accounts



Source: D5 Does your parent or caregiver know that you have an/a account?

Base: 306 children aged 8 to 12 who had at least one account on a social media service.

Note: Social media services include Facebook, Instagram, Reddit, Snapchat, TikTok, Twitch, YouTube and Discord.

Children aged 8 to 12 were especially likely to report that their parent or carer knew about their YouTube<sup>88</sup> account (Figure 13) – more than 9 in 10 (94%) – while the proportion was just under 9 in 10 for an account on Facebook (89%), Snapchat (88%) and Instagram (87%), and just over 8 in 10 for an account on Discord (84%) and TikTok (82%).

<sup>&</sup>lt;sup>88</sup> While YouTube and YouTube Kids were assessed separately in the survey, participants may not have been aware of the difference between the two platforms. In addition, it is possible that participants had used YouTube in their classrooms via YouTube Player for Education.

8% 6% 4%

YouTube 94% 4%

Facebook 89% 11%

Snapchat 88% 7% 5%

Instagram 87% 6% 6%

Discord 84% 10% 6%

82%

Doesn't know about account

■ Don't want to say

Figure 13: Parental knowledge of social media accounts

**Source**: D5 Does your parent or caregiver know that you have an/a account?

■ Knows about account

Not sure

Bases: Range from 62 to 136 children aged 8 to 12 who had an account on Facebook, Instagram, Reddit, Snapchat,

TikTok, Twitch, YouTube or Discord.

TikTok

**Note:** Bases for Reddit and Twitch too low (n < 50) to report separately.

### What does this information tell us?

The majority of children aged 8 to 12 who reported having their own social media account(s) said they were being helped by an adult to set up these accounts and did not hide their social media accounts from their parents or carers. However, parental consent is not commonly sought as a means of assessing age for the majority of social media services.

A large proportion (77%) of children aged 8 to 12 who had at least one account on a social media service told us they had help setting up at least one of their accounts. Yet with the exception of YouTube, all these services require children to be at least 13 years old to use the services.

This suggests parents and carers may be actively helping children under 13 to bypass the self-declaration process and gain access to services even when they do not meet the minimum permitted age.

However, it is possible parents and carers who assist children to set up social media accounts may engage in a range of mediation or parenting strategies whilst doing so. For example, they may explain risks, discuss content or online activities or support children to set up accounts with more restrictions like time limits or other technical controls.

This trend could present an opportunity for social media services to explore greater parental engagement at sign-up. Given parents and carers already tend to be involved in the set-up process of children's social media accounts, parental engagement and/or consent processes could present a way for social media services to:

- · inform parents and carers about the service
- explain its age restrictions and obtain confirmation of age
- highlight its parental control functions and the ways in which children can be kept safe online while using the service.

### How easy was it to report an under-13 user?

Under section 15 of the Basic Online Safety Expectations, services are expected to provide clear and readily identifiable mechanisms for end-users and non-users of a service to report breaches of their terms of use, including where a user may be under the permitted age of use.

eSafety asked the eight social media services what reporting mechanisms were provided, whether they were available in-service (meaning that the user could report without having to navigate to a separate webform or email address), and the number of steps required to submit a report.

### What did social media services report?

Table 9 summarises the responses about the reporting mechanisms.

More detailed information about the steps required to commence and complete a report is set out in individual summaries at the end of this report.

Table 9

65

Service	What mechanisms are provided to end-users to report another end-user as being under 13?	Were these mechanisms provided in- service? Y/N	Number of steps required by the end-user to submit a report
Discord	Discord users may submit reports through an in-app reporting mechanism.  Users, parents/guardians and other concerned individuals can also submit a report through a free-text webform.	Yes, except for the free-text webform	6 steps

Facebook	Users must fill in a form to report an underage user.	Yes - this form can be accessed in- service through the 'Report' function on an account profile. It can also be accessed by navigating to the Help Centre which is not 'in-service'.	5 steps to report via the Help Centre and 5 steps via the 'Report' option <sup>89</sup>
Instagram	Users must fill in a form to report an underage user.	Yes - this form can be accessed in- service through the 'Report' function on an account profile. It can also be accessed by navigating to the Help Centre, which is not 'in-service'.	5 steps to report via the Help Centre and 6 steps via the 'Report' option <sup>90</sup>
Reddit	Logged in users can report through the Reddit Help Centre report form, accessed via  • the URL • Reddit's 'Help center' • Reddit's standard messaging page Users who do not have an account or who do not wish to login may report underage users via Reddit's Help Center 'other reports' web form, which does not require logging in.	No. <sup>91</sup>	If reporting via the form URL, this requires 2 steps.  Navigating to the form through the Reddit Help Centre requires 5 steps or 8 steps. 92

<sup>&</sup>lt;sup>89</sup> These steps do not include the number of steps/clicks or information required to fill out the 'report underage user' form. Meta provided a link to the form which prompts the user to undertake several steps including finding, copying and pasting the URL of the account, profile or page or Quest username, the full name of the person, whether the person is located in one of four specific countries, 'other' information and the email address of the person wishing to make the report. Facebook (n.d.), 'Contact Forms', <a href="https://www.facebook.com/help/contact/209046679279097">https://www.facebook.com/help/contact/209046679279097</a>, accessed 28 October 2024.

<sup>&</sup>lt;sup>90</sup> These steps do not include the number of steps/clicks or information required to fill out the 'report underage user' form. Meta provided a link to the form which prompts users to undertake several steps including providing the username of the account and full name of the person and date of birth of the person the user wishes to report, the reporter's relationship to the person (for example, parent, sibling, non-family member) and the reporter's email address. Instagram (n.d), 'Instagram Help Center', <a href="https://help.instagram.com/contact/723586364339719">https://help.instagram.com/contact/723586364339719</a>, accessed 28 October 2024.

<sup>&</sup>lt;sup>91</sup> Reddit stated that the report form and Help Centre is available 'in-service' however this requires first locating the webform which is not 'in-service' as per eSafety's definition which is that users are not required to locate a separate webform or email address.

<sup>92</sup> More detail on the steps to report an underage user on Reddit is set out on page 85.

Snapchat <sup>93</sup>	Logged-in users can report:  • through the Snapchat Support webform  • in-app when encountering evidence (chat or content) of an underage user  • in-app by navigating to a profile and reporting the profile.	Yes, except for the webform which is on the Snapchat support page (and not 'in-service').	<ul> <li>The Snapchat Support webform requires 5 steps. 94</li> <li>Reporting chat or media content in-app takes 4 steps.</li> <li>Reporting accounts inapp takes 6 steps. 95</li> </ul>
TikTok	Logged-in users can report:  • someone's profile (account level report)  • a video or a LIVE (a content level report)  • a direct message.  Parents and guardians can also submit an online 'report a problem' form through TikTok's Help Centre.	Yes, except for the 'report a problem' form which is designed for parents and guardians and is located in the Help Centre.	<ul> <li>Account level report: 4 steps</li> <li>Content level report for videos: 3 steps</li> <li>Content level report for LIVE: 4 steps</li> <li>Webform for parents and guardians: 7 steps<sup>96</sup></li> </ul>
Twitch	Logged-in users can report on each Twitch channel page (including Whispers, the private messaging surface) through the web browser interface or mobile app. <sup>97</sup>	Yes.	4 steps to report an under 13 streamer or chatter video or a private message in Whispers. <sup>98</sup>
YouTube	Users can make a 'legal report' in-service on a video or channel, or via an external webform.	Yes, except for the external webform.	4 steps to make an in-service report

**67** 

<sup>&</sup>lt;sup>93</sup> Snapchat advised eSafety that it had updated and improved its user reporting process to report under-13 users in October 2024. More detail is set out on page 89.

<sup>&</sup>lt;sup>94</sup> This does not include steps required to fill out and submit the form.

<sup>95</sup> More detail on the steps to report an under-13 user on Snapchat are set out on page 88.

<sup>&</sup>lt;sup>96</sup> More detail on the steps to report an under-13 user on TikTok is set out on page 94.

<sup>&</sup>lt;sup>97</sup> Twitch stated that users who are not logged in to a Twitch account cannot currently make user reports to Twitch but that Twitch intends to launch this function in Australia soon.

<sup>98</sup> More detail on the steps to report an under-13 user on Twitch is set out on page 96.

Services were also asked to provide the number of reports of potential under-13 users that were commenced, and what proportion of those reports were completed.

This question was intended to give an indication of how easy users found it to complete the report using the mechanisms provided by the service. Table 10 shows that only Instagram and Facebook were able to provide this information.

Table 10

Service	Number of reports that were commenced to report an end-user under 13	Proportion of reports that were completed by the user
Discord	Discord did not provide99	Discord did not provide
Facebook	2,354	89%
Instagram	3,643	96%
Reddit	Reddit did not provide <sup>100</sup>	Reddit did not provide
Snapchat	Snap did not provide <sup>101</sup>	Snap did not provide
TikTok	TikTok did not provide <sup>102</sup>	TikTok did not provide
Twitch	Twitch did not provide <sup>103</sup>	Twitch did not provide
YouTube	Google did not provide <sup>104</sup>	Google did not provide

Instagram's and Facebook's responses indicated that a high percentage of reports commenced by users were completed and submitted to the service – 96% for Instagram and 89% for Facebook.

Further information about the process for users to submit reports to Instagram and Facebook is set out on pages 81 and 83.

All other services said they do not collect this information for various reasons.

<sup>&</sup>lt;sup>99</sup> Discord stated that it does not track the number of reports that are commenced but are not completed.

<sup>&</sup>lt;sup>100</sup> Reddit stated that it does not have data on the number of underage report forms that an end-user started to fill out but did not submit.

<sup>&</sup>lt;sup>101</sup> Snap stated that it does not collect information on the number of reports that were commenced but not completed by a user.

<sup>&</sup>lt;sup>102</sup> TikTok stated that it does not track reports that are commenced by a user but not submitted because TikTok's means of reporting do not involve multiple stages that would otherwise allow it to progressively track a user's attempt to make a report.

<sup>&</sup>lt;sup>103</sup> Twitch stated that it does not track and cannot retroactively determine the number of reports that were commenced but not completed.

<sup>&</sup>lt;sup>104</sup> Google stated that it does not record the number of accounts removed by identification method, and is unable to provide a response to this question.

### What does this information tell us?

Related key finding: Complicated processes to report an under-13 user for some services

From the responses from social media services – as set out in greater detail at the end of this report - it appears that reporting an under-13 user may have been clearer and easier on some services than others. Some elements of user reporting which may impact how clear and easy it is to report a user under-13 to the service include:

- how many steps it takes to commence and complete a report
- whether a user can report something in-service for example, by clicking on a 'report' button that is next to the content, account or message they wish to report rather than needing to navigate to a separate webform or email address
- whether there is a clear reporting category to report under-13 users
- any steps in the process which may deter someone from making a report, such as being required to provide their own personal information to the service or provide details of the suspected under-13's actual age or identity, or account.

The reporting mechanisms provided to users of some social media services were not always as clear and as readily identifiable for users as they could be. More detail on the specific steps to report a potential under-13 user for each service is set out in the individual provider summaries at the end of this report.

These are some examples of where some reporting options contained clear and readily identifiable elements and others did not:

- Discord allowed users to report directly in messages including Direct Message, Group
  Direct Message, in a server and including text messages sent in text-in-voice channels,
  with a dedicated category for reporting an under-13 user. eSafety considers this to be an
  example of best practice.
- Instagram and Facebook provided a dedicated category for reporting an account profile. However, the reporter was directed to fill out a webform which required the reporter to provide multiple pieces of information, including the full name of the under-13 user, the date of birth of the under-13 user and the reporter's relationship to the user (Instagram only), a URL to the account that the reporter wished to report (Facebook only) and personal information about the reporter.
- Reddit had a dedicated webform but it was only available in the Help Centre and not inservice on content, messages or accounts. For logged-in users, the webform was prepopulated with the subject 'underage user' and users were only required to fill out a 'message' to the Reddit admin team and click 'send'. Links to posts, comments,

messages or other information were not required to submit the report, though Reddit noted that this information can be useful to include. For logged-out users, the webform required more details to be provided in order to submit the report.

- Snapchat did not provide specific in-app reporting categories. Reporters instead had to select non-related categories such as 'false information or deceptive practices' and provide details in a comment box. During the reporting period, Snapchat enabled reporting of suspected underage accounts via an online webform on the Snapchat Support website. Although Snapchat has more recently improved its processes (since October 2024) by providing specific reporting categories for in-app reports, reporters are still required to fill out a webform which requires the reporter's name, email and age, where they saw the content, the age of the reported account holder and a description of the issue or links to content.
- TikTok provided in-service reporting mechanisms with dedicated categories to report
  under-13s for content (LIVE content, but there was no specific reporting category for
  short form videos), account profiles and direct messaging. TikTok did not require the
  user to complete a webform or provide multiple pieces of information. eSafety considers
  this to be an example of best practice.
- Twitch provided in-service reporting for Streams and Whispers with a dedicated category for reporting under-13 users, which did not require the reporter to fill out a webform or provide multiple pieces of information. eSafety considers this to be an example of best practice.
- YouTube provided in-service reporting options for videos or channels, however this directed the reporter to a webform which required reporters to provide multiple pieces of information, including their full name, details about the specific law that the content is allegedly violating, or the area of the law from which they believe the issue arises and provide a hyperlink to the specific law.

eSafety notes a specific category of 'report someone under 13' (or similar) is particularly helpful as it allows a user to report the exact issue they wish to bring to the service's attention, rather than relying on reporting categories that do not make sense or, worse, abandoning the attempt to report because there is no clear option to report that issue.

All services except Snapchat and YouTube reported having a dedicated category to assist users to report an underage user.<sup>105</sup> The wording of each category differed slightly (for example, Discord provided the option 'This person is too young to use Discord' and Facebook provided the option 'Report an account belonging to an underage user').

<sup>&</sup>lt;sup>105</sup> Snapchat stated that, as of 15 October 2024, Australian Snapchat users can access a dedicated in-app feature for reporting accounts suspected to be held by users under the age of 13.

eSafety also notes information about the number of reports commenced and completed is important to track because it is a key indicator whether the user reporting mechanism is clear and readily identifiable. If the steps a user is required to take are complicated, time-consuming or burdensome, this may lead to the user abandoning their attempt to report to the service. This is particularly important for services which rely heavily on user reporting to identify under-13s on the service.

# How many users under 13 were reported or flagged and how long did it take services to respond?

### How many reports of potential under-13 users were made to services?

Service providers were asked to provide the total number of reports made by end-users regarding a potential under-13 Australian user. Providers were also asked to specify the proportion of those reports that were received by human moderators/staff of the service, the proportion of reports that led to action after being reviewed, and the number of reports made to the service that were not reviewed by human moderators or staff and not actioned.

Table 11

Service	Total number of reports made by end-users regarding end-users under 13	that were reviewed by reports made by an end-user about an end-user under 13		Number of reports made by an end-user about an end-user under 13 that were not reviewed by a human moderator/staff of the service and not actioned	
Discord	27,615	70.2% <sup>106</sup>	48.7% <sup>107</sup>	8,236.	
Facebook	2,095	7.90%108	4.30% <sup>109</sup>	131	
Instagram	3,506	9.17% <sup>110</sup>	8.98% <sup>111</sup>	659	
Reddit	43	100%	71.4%	0	
Snapchat	109112	65% <sup>113</sup>	32%	38%	
TikTok	322,523114	16.38% <sup>115</sup>	83.02%	173,187 <sup>116</sup>	
Twitch	6,390	74.6%	15.4%	1,621117	
YouTube	Google did not provide <sup>118</sup>	Google did not provide	Google did not provide	Google did not provide	

<sup>&</sup>lt;sup>106</sup> Discord stated that this proportion was calculated by dividing the number of human reviewed underage reports by the total number of underage reports made (without de-duplication).

<sup>&</sup>lt;sup>107</sup> Discord stated the proportion of underage reports that were both human reviewed and actioned ('action' meaning that an adverse action–generally an account ban–was taken against the reported user), relative to the number of human reviewed underage reports, is 48.7%.

<sup>&</sup>lt;sup>108</sup> Meta stated that the reports not reviewed by human moderators/staff of Facebook were 'either automatically closed (e.g. because they were duplicative) or were reviewed by automated systems.

<sup>&</sup>lt;sup>109</sup> Meta stated that this is the proportion of accounts that were banned for violation of Meta's underage account policies.

Meta stated that the reports not reviewed by human moderators were 'either automatically closed (e.g. because they were duplicative) or were reviewed by automated systems.

<sup>&</sup>lt;sup>111</sup> Meta stated that this is the proportion of accounts that were banned for violation of Meta's underage account policies.

<sup>&</sup>lt;sup>112</sup> Snap stated that this figure relates to reports received through the Snapchat Support webform.

 <sup>113</sup> Snap stated that reports may be automatically closed in certain circumstances, including because they are suspected to be spam reports. In these circumstances, those reports are not reviewed by human moderators.
 114 TikTok stated that it received 322,523 reports at the account level, in relation to 207,111 user accounts. TikTok stated that it is not able to trace and provide data for reports made through other parts of the platform (e.g. through LIVES, direct messages or for content violations.

<sup>&</sup>lt;sup>115</sup> TikTok stated that this is the percentage of the 207,111 user accounts that were reported (although 322,523 reports were made in total. TikTok stated this reflects duplicative accounts). TikTok also stated that this figure is low because account-level reports made by users are first assessed by TikTok's models to determine the likelihood of the account belonging to a user under 13, and reports with a low likelihood are discarded. TikTok stated that this figure reflects the low quality or accuracy of user reports which are 'often not reliable'.

<sup>&</sup>lt;sup>116</sup> TikTok stated that this is the proportion of accounts that were not reviewed, as opposed to the number of reports reported (due to duplicative reports). TikTok stated that 'this figure demonstrates the low quality or accuracy of user reports' as these reports were not enqueued for moderation due to being assessed by TikTok's tools as a low likelihood of the account holder being under 13.

Twitch stated that these reports were not reviewed by a human because they were duplicative of other reports received and were thus resolved automatically.

<sup>&</sup>lt;sup>118</sup> Google stated that it does not collect certain information regarding the age of users due to the way it manages Google Accounts. Google also stated that it does not collect these metrics because user reporting is not a core part of YouTube's tools and processes to detect potential under-13 users. Instead, Google's automated tools account for the vast majority of suspensions or bans of under-13 users.

Google was the only service provider which could not provide information regarding the number of user reports of potential under-13 users with prohibited accounts and the proportion of these reports that were reviewed and actioned by YouTube's human moderators and staff. eSafety considers this to be a safety concern as it indicates Google is not tracking key safety metrics which enable evaluation and improvement of interventions specific to YouTube.

Social media services were asked to provide the number of reports that end-users made to the service about suspected under-13 users which were reviewed by the service's human moderators. They were also asked to provide the median time it took human moderators to respond to those reports. Table 12 sets out the responses received.

Table 12

Service	Total number of reports made by end-users reviewed by human moderators	Median time to respond to reports (minutes)		
Discord	19,379 <sup>119</sup>	473 minutes (7 hours and 53 minutes) <sup>120</sup>		
Facebook	186	5.40 minutes <sup>121</sup>		
Instagram	334	6.12 minutes <sup>122</sup>		
Reddit	43	1,543 minutes (25 hours and 43 minutes)		
Snapchat	109123	255 minutes (4 hours and 15 minutes)		
TikTok	20,261 <sup>124</sup>	113 minutes and 47 seconds (1 hour, 53 minutes and 47 seconds)		
Twitch	6,390	1.87 minutes		
YouTube	Google did not provide <sup>125</sup>	Google did not provide		

<sup>&</sup>lt;sup>119</sup> Discord stated that all de-duplicated reports that were reviewed by human moderators reached an outcome (which can include a decision not to take any action against the reported user), with the possible exception of a de minimis number of reports that might contain a technical error which renders it impossible to reach an outcome on the report.

<sup>&</sup>lt;sup>120</sup> Discord stated that it had 'identified and corrected some inefficiencies in this process and are confident the median time to respond will improve in the future'.

<sup>&</sup>lt;sup>121</sup> Meta stated that this figure relates to reports submitted via the reporting form accessible via the 'Report' option in the app, and does not include reports submitted via the reporting form through the Help Centre as Meta does not hold sufficient data to estimate the number of reports made in that way.

<sup>&</sup>lt;sup>122</sup> Meta stated that this figure relates to reports submitted via the reporting form accessible via the 'Report' option in the app, and does not include reports submitted via the reporting form through the Help Centre as Meta does not hold sufficient data to estimate the number of reports made in that way.

<sup>&</sup>lt;sup>123</sup> Snapchat stated while users are able to report other users for being underage through reporting chat or media content in-app, or reporting accounts in, it could not provide metrics for these reports during the reporting period. <sup>124</sup> TikTok stated that this is the total number of user reports that were reviewed by human moderators which were submitted via a user's profile. TikTok stated that it could not provide data for reports made through other parts of the platform (e.g. through LIVEs, direct messages or for content violations that resulted in an account being banned for belonging to a suspected underage user) due to the way data about reports is transferred to the specialist underage human moderation queue.

Google stated that it does not record the number of accounts removed by identification method, and is unable to provide a response to this question.

While most services reported that their human moderators responded to reports within a matter of minutes or hours (1.87 minutes for Twitch, mere minutes for Instagram and Facebook, just under 2 hours for TikTok, 4 hours for Snapchat and just under 8 hours for Discord), Reddit took 25 hours to respond to reports of potential under-13s.

Google was the only service provider which could not provide the total number of reports made by end-users that were reviewed by YouTube's human moderators, and the median time to respond to those reports. Google stated that its 'handling of underage user accounts is not product- or service-specific, but impacts the user's Google Account as a whole' and it does not record the number of accounts removed by the method of discovery. It also stated that it 'relies principally on automated tools/processes made by rep, rather than user reporting, to detect potential under 13 users'.

Even so, eSafety considers this to be a safety concern as it indicates that Google is unaware of the potential scale of under-13s using YouTube via accounts that are not connected with Family Link, in violation of terms of use. YouTube is the most-used service by under-13s in Australia, with nearly 12.9% of 8- to 12-year-olds surveyed reporting that they had their own account, which may or may not have been an account they used to access other Google products and services, or linked to the account of a parent through FamilyLink (or YouTube Kids or Google Workspace for Education accounts).

Services were also asked to provide the number of reports that were generated by automated tools on the service, including the median time it took human moderators to respond.

Table 13

Service	Number of reports generated by automated tools to identify an end-user as potentially being under the age of 13, where reports were reviewed by human moderators	Median time to respond to reports (minutes)
Discord	N/A <sup>126</sup>	N/A
Facebook <sup>127</sup>	61	18.94 minutes
Instagram <sup>128</sup>	25	3,506.63 minutes (58.44 hours)

<sup>&</sup>lt;sup>126</sup> Discord stated that its age inference model predicts whether a user belongs to an age cohort starting with age 13 (for example, 13 to 17, 18 to 24) and does not generate a specific predictive age for the user. The age inference model is not capable of estimating whether a user belongs to a cohort under the age of 13. <sup>127</sup> Same as footnote above.

<sup>128</sup> Meta stated that these figures relate to reports generated by tools in a range of circumstances, including where Yoti's facial age estimation tool is used and estimates a user to be under 13, where a user goes through ID verification to change their date of birth information and does not provide adequate documentation within a specified period of time, where a human reviewer is evaluating an account level violation (such as impersonation) and flags the account as potentially belonging to a user under 13, and when a user's Facebook or Instagram account is suspended for potentially belonging to a user under 13 (for any reason, including user reports) and they have another account in the Accounts Centre which is simultaneously suspended.

Reddit	N/A <sup>129</sup>	N/A
Snapchat	41	Snap did not provide <sup>130</sup>
TikTok	302,733 <sup>131</sup>	131 minutes and 19 seconds (2 hours, 11 minutes and 19 seconds)
Twitch	1,034	1.42 minutes
YouTube	Google stated it does not have this data <sup>132</sup>	Google stated it does not have this data

#### What does this information tell us?

There is considerable variation in the speed with which human moderators responded to reports of potential under 13 users on the services. eSafety acknowledges that speed in responding is not the only important aspect of reviewing user reports. However, service providers are expected to review and respond to user reports within a reasonable time, having regard to relevant factors such as the nature and impact of the harm that is the subject of the report, the complexity of investigating the report and other relevant matters.<sup>133</sup>

## Actions taken in relation to under-13 users

# How many accounts were suspended due to being under-13s?

Social media services were asked to provide the number of suspensions or bans that the service made due to the account holder being under 13, as well as the proportion of those suspensions or bans that were a result of the service's proactive detection tools (if used) and the proportion that were a result of user reports made to the service.

<sup>&</sup>lt;sup>129</sup> Reddit stated that it does not use automated tools to flag an end-user as being potentially under 13, although Reddit does use automated tools to detect and ban any associated accounts once a user is identified as being under 13. Reddit stated that these bans happen automatically without additional human review.

<sup>&</sup>lt;sup>130</sup> Snap stated that it was still in the initial testing phase of work regarding proactive language analysis which commenced testing in June 2024, and is not able to provide a median response time.

<sup>&</sup>lt;sup>131</sup> TikTok stated that it calculated this number with reference to TikTok's 'proactive detection tools', and TikTok includes a human moderator transferring a user account to the underage moderation queue for review.

<sup>&</sup>lt;sup>132</sup> Google stated that it does not record the number of accounts removed by identification method, and is unable to provide a response to this question. Google also stated that YouTube's processes to detect under-13 channel owners does not involve human review in the vast majority of cases.

<sup>133</sup> Section 14(3) and (4) of the Online Safety (Basic Online Safety Expectations) Determination 2022.

Table 14

Service	Number of suspensions/bans made due to the account holder being under 13	Proportion of accounts suspended/banned as a result of proactive detection (such as signals and tools)	Proportion of accounts suspended/banned due to account holder being under 13 as a result of user reporting (such as another end-user, or a parent)
Discord	6,109	0.08%	99.9%
Facebook	9,369	93.23%	6.77%
Instagram	9,610	96.12%	3.88%
Reddit	184	84.8% <sup>134</sup>	15.2%
Snapchat	32	4%	96%
TikTok	303,031	93.7%	6.3%
Twitch	1,064	21.1%	79.9%
YouTube	15,500 <sup>135</sup>	Google did not provide <sup>136</sup>	Google did not provide

Google was the only service provider which did not provide information about the proportion of accounts that were banned as a result of proactive detection tools and the proportion of accounts that were banned as a result of user reporting.

# Which tool or indicator led to the majority of suspensions or bans of underage users?

Service providers were asked to specify which tool or indicator led to the majority of the suspensions or bans of accounts due to users being under the age of 13.

<sup>&</sup>lt;sup>134</sup> Reddit stated that 84.8% of the 184 banned accounts were made as a result of the automated tools its uses to search for and ban any alternative accounts held by a user who has already been identified and banned by Reddit. <sup>135</sup> Google stated that it could provide this information only for the months of January 2024 (approximately 6,000 accounts), April 2024 (more than 5,500 accounts) and July 2024 (approximately 4000 accounts). Combined, this amounts to 15,500 accounts but does not represent the entire reporting period of January – July 2024. <sup>136</sup> Google stated that this information was 'not available'. Google noted that automated detection accounts for the vast majority of suspensions/bans of under-13 users.

Table 15

Service	Which tool or indicator led to the majority of suspensions/bans?			
Discord	Discord stated it did not have automated detection tools for underage users.			
Instagram	Meta stated that it did not have data available to answer this question, noting that account suspensions or bans could be made as a result of different tools and indicators.			
Facebook	Meta stated that it did not have data available to answer this question, noting that account suspensions or bans could be made as a result of different tools and indicators.			
Reddit	Reddit reported that automated detection of alternative accounts belonging to users that were banned for being underage (following a third party or user report) led to the majority of suspensions/bans.			
Snapchat	Snap reported that 96% of account bans were made as a result of third party reporting (including user reports), and only 4% as a result of its proactive language analysis technology.			
TikTok	TikTok reported that AI profiling and inference models led to the majority of suspensions/bans.			
Twitch	Twitch reported that user reporting and behavioural analysis led to the majority of suspensions/bans.			
YouTube	Google reported that its automated tools account for the vast majority of suspensions or bans of under-13 users			

# What was done to prevent banned underage users from re-registering on services?

eSafety asked social media services questions about any measures they took to prevent a user who had their account suspended or shut down for being under 13 from creating another account, while they were still under 13. eSafety asked whether any 'indicators' were used to detect where a new account may belong to someone whose account was banned for being under 13. eSafety also asked whether these indicators were used by default in the case of all bans and suspensions, or only in certain circumstances. Examples of indicators that could be used include the name and email address used to create the account as well as technical indicators regarding the device used to create an account.

Service providers reported using different indicators, and some were using more indicators than others.

Table 16

Service	Indicators used to prevent endusers who had been suspended/banned from the service for being under 13 from re-registering for an account on the service?	Indicators used by default, or only in certain circumstances?
Discord	Yes	By default
Facebook	No	N/A
Instagram	No	N/A
Reddit	Yes	By default in all cases
Snapchat	No <sup>137</sup>	N/A
TikTok	Yes	By default in all cases
Twitch	Yes	By default in all cases
YouTube	Yes	By default in all cases

#### What does this information tell us?

Related key finding: Re-registration loopholes for some services

Facebook, Instagram and Snapchat did not use any indicators to prevent a user who was banned or suspended for being under the permitted age of use from immediately re-registering for the service.

All other providers used indicators to prevent under-13 users from circumventing the ban or suspension and accessing the service. The number and nature of indicators used by Discord, Reddit, TikTok, Twitch and YouTube varied, and eSafety has chosen not to publish this information so that users do not circumvent the processes in place by these five services.

<sup>&</sup>lt;sup>137</sup> Snap stated that it began testing a new mechanism to proactively detect users under the age of 13 in June 2024. Snap is exploring extending this proactive detection tool on its service. Snap also stated that in its human review workflow, Snap will examine account information (such as username and display name) to identify potential duplicate accounts created after an initial account termination due to age restrictions. If a duplicate account is confirmed, Snap will delete the new account as well.

# Additional information provided by the social media services

In their responses to the Information Requests, some services also provided additional context to the information captured in the tables throughout this report. That additional context is summarised below.

### **Discord**

#### Use of tools to assess the age of end-users

As reflected in the table on page 38, Discord stated it deploys a neutral age gate at the point of sign-up and had an age estimation model that was used at various points from 1 January to 31 July 2024 to predict whether a user belonged to an age cohort of 13 or older, but the model did not generate a specific predictive age for the user and it is not capable of estimating whether a user belongs to a cohort under the age of 13.

Discord also stated it requires a user to input their date of birth on sign-up and requires a user to appeal an age ban by providing a photo of themselves holding their photo identification (showing the date of birth) and a piece of paper with their full Discord username. Additionally, Discord stated human moderators undertake proactive searching during proactive investigations or other report investigations.

#### Reporting end-users under 13

Discord stated it takes six steps to report an end-user as being under 13.

It provided the following steps to report an end-user from within any message sent on Discord:

- 1. Mousing over (or long-pressing on mobile) the message a user wishes to report and selecting the '...' icon.
- 2. Selecting 'Report message'
- 3. Selecting 'Something else' as the option that best describes the problem.
- 4. Selecting the 'This person is too young to use Discord' as the option for assistance.
- 5. Selecting 'Yes they state their age in this message'. If the user selects the option 'No, they don't state their age in this message', then Discord requests that they 'Please find and report the message where this person states their age or indicates in some way that they are too young to use Discord'. Selecting 'Submit' to finalise the report and submit to Discord.

Discord also stated users, parents and/or guardians and other concerned individuals may also submit a report that the age associated with a user account b updated through a free-text web form.

#### Median time to respond to user reports

Discord stated the median time to respond to a user report of a potential under-13 end-user was 473 minutes (7 hours and 53 minutes). Discord stated once the report had been assigned to a human reviewer for moderation, the median time to complete that report was 24 minutes. eSafety understands this to mean there was a delay between a report being made by an end-user on Discord and it being assigned to a human reviewer (with a median delay of 7 hours and 29 minutes) – but once the report was assigned, a human reviewer completed the report within a median period of 24 minutes.

Discord also stated 'Discord has identified and corrected some inefficiencies in this process and are confident the median time to respond will improve in the future'.

#### **Facebook**

#### Use of tools to assess the age of end-users

Meta stated Facebook used an account registration age gate, Yoti's facial age estimation technology, ID verification, AI technology and human review to assess the age of users.

The table on page 38 sets out information regarding the tools and technologies used (account registration age gate, Yoti's facial age estimation technology and Meta's AI technology).

Meta reported it allows a user to verify their age through ID verification<sup>138</sup> if the user attempts to change their date of birth:

- to a date indicating they are under 13 (which results in their account being checkpointed) or
- to go from an age under 18 to an older age, or from an older age to under 18.

Meta also required a user to verify their age through ID verification when they are placed in a checkpoint due to suspicion of being under the age of 13.

<sup>&</sup>lt;sup>138</sup> Meta stated that Facebook users could provide one form of Government ID to verify their age, such as driving license, national identity card, passport and birth certificate, or alternatively a user could provide two forms of non-government ID which contain a user's full name, and at least one ID containing the user's photo and age (for example, student card, library card, refugee card, employment verification, diploma and loyalty card. More information is available on Facebook's webpage: Facebook (n.d), 'Types of IDs that Facebook accepts | Facebook Help Centre', https://www.facebook.com/help/159096464162185, accessed 15 January 2025.

Meta also reported human reviewers evaluate Facebook account level violations (for example, impersonation) and may flag an account as potentially belonging to a user under 13. Meta stated that an account that is flagged in this way, or by a user report, is directed to human reviewers specifically for further evaluation of potential underage use, unless the flag can be resolved through automated processes (for example, where the account has previously been cleared through human review).

#### Steps taken when indicators assess that a user may be under 13

In addition to the information set out in the table on page 38, Meta reported that if a Facebook account is referred to a human reviewer for evaluation of a potential under-13 user and the human reviewer finds sufficient signals, the user is immediately placed in an age checkpoint. Meta stated reviewers who are unsure whether a user is under 13, based on review of the account media, are instructed to default to a finding the user is underage and place them in a checkpoint. Once checkpointed, the user is required to verify their age using one of the options provided, such as providing a photo ID issued by a government or by a non-government organisation.

#### Reporting end-users under 13

Meta stated users must complete a form to report a suspected under-13 user on Facebook. Users can take the following steps to navigate to the form and complete it:

- Reporting via the Help Centre:
  - 6. Navigate to 'Help Centre' 139
  - 1. Search 'Report underage user' (or similar)
  - 2. Click 'Report a child under 13 on Facebook'
  - 3. Click 'Fill in this form'
  - 4. Complete and send the form
- Reporting an account profile:
  - 1. Click 'Report profile' on the user's account profile
  - 2. Click 'Something about this profile'
  - 3. Click 'Something else'
  - 4. Click 'Report an account belonging to an underage user'

<sup>&</sup>lt;sup>139</sup> Meta did not explain how many steps or clicks are required to navigate to the Help Centre from a piece of content or within a direct message etc. where a user may wish to make a report.

5. Complete and send the form.

Meta provided a link to the form<sup>140</sup> which prompts the user to undertake several steps including finding, copying and pasting the URL of the profile or page or Quest username, the full name of the person, whether the person is located in one of three specific locations, 'other' information and the email address of the person wishing to make the report.

## Instagram

#### Use of tools to assess the age of end-users

Meta stated Instagram used an account registration age gate, Yoti's facial age estimation technology, ID verification, AI technology and human review to assess the age of users.

The table on page 38 sets out information regarding the tools and technologies (account registration age gate, Yoti's facial age estimation technology and Meta's AI technology).

Meta reported it allows a user to verify their age through ID verification if the user attempts to change their date of birth:

- to a date indicating they are under 13 (which results in their account being checkpointed) or
- to go from an age under 18 to an older age, or from an older age to under 18.

Meta also requires a user to verify their age through ID verification<sup>141</sup> when they are placed in a checkpoint due to suspicion of being under the age of 13.

Meta also reported human reviewers evaluate Instagram account level violations (for example, impersonation) and may flag an account as potentially belonging to a user under 13. Meta stated an account that is flagged in this way, or by a user report, is directed to human reviewers specifically for further evaluation of potential underage use, unless the flag can be resolved through automated processes (for example, where the account has previously been cleared through human review).

<sup>&</sup>lt;sup>140</sup> Facebook(n.d.), 'Facebook Help Centre', accessed 28 October 2024.

<sup>&</sup>lt;sup>141</sup> Meta stated that Instagram users suspected of being under 13 could provide one ID from a list of options which contains either the user's full name and photo or a user's full name and age (for example, birth certificate, driving license, passport, marriage certificate, official name change paperwork, visa and other examples). Meta stated that, alternatively, an Instagram user can provide two documents from a list of options which both contain the user's full name, and at least one of the documents containing the user's photo and age, for example, bank statement, travel pass, cheque, credit card, employment verification, library card, payslip, school ID card, and other examples). A full list of accepted documents for this purpose can be found on Instagram's website: Instagram (n.d), 'Types of ID Instagram accepts | Instagram Help Center', https://help.instagram.com/271237319690904 accessed 15 January 2025.

#### Steps taken when indicators assess that a user may be under 13

In addition to the information set out in the table on page 38, Meta reported if an Instagram account is referred to a human reviewer for evaluation of a potential under-13 user and the human reviewer finds sufficient signals, the user is immediately placed in an age checkpoint. Meta stated reviewers who are unsure whether a user is under 13 based on review of the account media, are instructed to default to a finding that the user is underage and place them in a checkpoint. Once checkpointed, the user is required to verify their age using one of the options provided, such as providing a photo ID issued by a government or by a non-government organisation.

#### Reporting end-users under 13

Meta stated users must complete a form to report a suspected under-13 user on Instagram. Users can take the following steps to navigate to the form and complete it:

- Reporting via the Help Centre:
  - 6. Navigate to 'Help Centre'142
  - 1. Search 'Report underage user' (or similar)
  - 2. Click 'Report a child under 13 on Instagram'
  - 3. Click 'Fill in this form'
  - 4. Complete and send the form
- Reporting an account profile:
  - 1. Click 'Report' on the user's account profile
  - 2. Click 'Something about this account'
  - 3. Click 'They may be under the age of 13'
  - 4. Click 'Learn More'
  - 5. Click 'Fill in this form'
  - 6. Complete and send the form

Meta provided a link to the form<sup>143</sup> which prompts users to undertake several steps including providing the username of the account and full name of the person and date of birth of the

<sup>&</sup>lt;sup>142</sup> Meta did not explain how many steps or clicks are required to navigate to the Help Centre from a piece of content or within a direct message etc. where a user may wish to make a report.

<sup>&</sup>lt;sup>143</sup> Instagram (n.d), 'Instagram Help Center', accessed 29 October 2024.

person the user wishes to report, the reporter's relationship to the person (parent, sibling, non-family member) and the reporter's email address.

#### Reddit

#### User demographics

Unlike other services, Reddit did not provide the average number of monthly active Australian end-users under the age of 18 (either from 13 to 15 and 16 to 17, or from 13 to 17 combined).

Reddit stated 'Reddit minimizes the data it collects from users and does not currently collect age or make inferences based on a user's personal information, as reflected in our Privacy Policy and principles'. Reddit also stated it is 'therefore unable to provide an estimate as to how many accounts belong to Australian users of the age ranges specified above'. However, Reddit stated external research confirms the overwhelming majority of Reddit users are 18 or older.<sup>144</sup>

Reddit does not require users to provide a date of birth when creating an account, despite Reddit's User Agreement<sup>145</sup> stating 'No one under 13 is allowed to use or access the Services'.

Under the Basic Online Safety Expectations, online services are expected to take reasonable steps to detect and address breaches of their terms of use (sections 14(1A) and 14(2)). eSafety's view is that requesting the age of a user is not an infringement on privacy where this is directly relevant to enforcing a service's own terms of use. There is also a clear expectation that service providers will provide information about the number of children using a service to eSafety on request (section 20(5)).

#### Use of tools to assess the age of end-users

As reflected in the table on page 38, Reddit stated it uses age-gating on content that has been identified as being for mature audiences, requiring users to click a button to affirm they are 18 or older before they can view the content.

Additionally Reddit stated Reddit users and other interested third parties may also submit reports of underage users to Reddit for review, and Reddit uses the 17+ rating (the highest available) on Apple's App Store to limit the discoverability and availability of the app for download by underage users who have parental controls enabled.

<sup>&</sup>lt;sup>144</sup> In response to a follow up question from eSafety, Reddit stated 'Recent Comscore data (September 2024) indicates that 82% of Australian Reddit users are over 18. This is inferential data, based on aggregated metrics of a sample of Internet users, as Reddit does not permit third-party data providers to directly track its users due to privacy concerns. We do not have access via the Comscore platform to the underlying research/raw data, which would need to be obtained directly from Comscore.'

<sup>&</sup>lt;sup>145</sup> Reddit (2024), '<u>User Agreement'</u>, accessed 29 October 2024.

#### Reporting end-users under 13

Reddit stated users can report other users suspected of being under 13 via a Help Centre report form. A human member of Reddit's safety team evaluates and investigates each report received.

Reddit stated that alternatively, users can message moderators or subreddits directly if they have concerns that a user of that subreddit is under 13. Moderators can then report them using the Help Centre report form 'should they believe the concern is well-founded'. eSafety understands that this leaves the decision to report to the discretion of the moderator rather than having a policy of mandatory reporting which would ensure expert human moderators determine if the user is under 13.

Reddit stated the number of steps it takes for an end-user to submit an underage user report depends on the path the end-user takes to get to the report form. Reddit outlined the following pathways to reporting:

- A logged-in user may go directly to the form URL<sup>146</sup> or to Reddit's standard messaging page<sup>147</sup>, and submit the form in 2 steps, if they have the URL. Reddit's logged-in underage (<13) user report form is pre-populated to send a message to Reddit's admin team with the subject 'underage user'. Because users must be logged in to use this particular form, all that a user needs to do is fill in the 'message' to the admin team and click 'send'. Reddit's related Help Center article informs users that it is helpful if they include links to any posts, comments, messages or information that led them to believe the account they are reporting is underage, but all that is required is that they fill in the 'message' box and submit the message.
- Alternatively, users may navigate to the form from the Help Center menu as follows: the user would navigate to the Help Center, click on 'Redditor Help', click on 'Rules and Reporting', click on 'reporting', click on 'see all 13 articles', click on the link to the relevant article ('How do I report someone I think is under the age of 13?'), click on the link to the form, and submit the form (8 steps, excluding the steps within the form).
- Another option is for users to go to the Help Centre (available in the left sidebar across reddit.com), search for the relevant article (for example 'underage') from the search box featured on the Help Center home page, click on the help center article (How do I report someone I think is under the age of 13?), click on the link to the form, and submit the form (5 steps, excluding the steps within the form).

<sup>&</sup>lt;sup>146</sup> Reddit stated that this may occur in cases when the user has the URL to the form (e.g., a moderator who has utilised the form in the past).

<sup>&</sup>lt;sup>147</sup> Reddit stated this was available at <a href="https://www.reddit.com/message/compose">https://www.reddit.com/message/compose</a>/ (and was also accessible in service via a user's mailbox).

• Reddit's logged-out report form prompts users to include their email address (so that Reddit has a way of contacting the reporter regarding their report), indicate their report type, list the username of the Reddit user that they are reporting, select the type of policy violation they are reporting (under 13 user), include links to content to be reviewed (for example content which made the reporter believe the user is underage), and provide a subject and details for their inquiry. Users have the option of providing their own Reddit username, as well as attachments. Users must also attest to having read Reddit's instructions and Content Policy prior to submitting the form.

## **Snapchat**

#### Use of tools to assess the age of end-users

As set out in the table on page 38, Snap reported it commenced using proactive language analysis in June 2024 to detect indicators on public profiles that a user may be under the age of 13. eSafety has chosen not to publish details of this proactive language analysis tool to prevent users from circumventing the tool. Snap stated where clear statements are made that a user is under 13, Snap takes action to terminate the account and delete the user's data.

Snap also reported it uses an inferred age model to detect users aged 13 to 18 when Snap is applying certain advertising, content and feature restrictions. Snap reported the inferred age model uses a variety of signals including interest-based factors and information about the way a user uses Snapchat to infer age from 13 to 18. Snap reported it uses this inferred age model to prevent age-restricted advertisements from being served to users who have declared themselves to be the appropriate age for those advertisements but who Snap modelling indicates are likely to be under the appropriate age.

Snap also reported the following:

- Snap requires individuals to declare their date of birth during the Snapchat account registration processes, and it prevents users who select a date of birth which indicates that they are under 13 from creating an account.
- Users with existing Snapchat accounts who are under the age of 18 are not permitted to change their year of birth. Snap reported that this control is continuously in place.
- Snap takes action to terminate an account and delete user data if it is made aware through third-party reporting that an account belongs to a user under 13.

### Snap's assessment of the accuracy of its tools for approximating age

Snap reported it had assessed the accuracy of its proactive language analysis tool and its inferred age model.

Snap reported it conducted precision metrics testing on its proactive language analysis tool which demonstrated that the tool's accuracy is 70-75%, meaning that when the tool determines that a user is under the age of 13, it is accurate 70-75% of the time and that 20-25% of the time there may be false positives. eSafety understands Snap's language analysis tool only detects signals on certain parts of public profiles.

Snap reported it conducted validation testing of its age inference model against the supplied ages of users and against matched age data provided by a third-party provider (Experian) to evaluate the model's accuracy. Snap provided the following example of validation testing.

Inferred age chart for 1 August 2024:

Supplied vs. Inferred age group

	Inferred Age Group →					
Supplied Age Group ↓	13-17	18-20	21-24	25-34	35-plus	unknown
13-17	89.90%	4.27%	3.52%	0.54%	1.77%	0.00%
18-20	14.63%	72.52%	8.55%	1.34%	2.97%	0.00%
21-24	11.04%	9.39%	72.13%	4.51%	2.93%	0.00%
25-34	4.22%	3.47%	7.57%	73.74%	10.99%	0.00%
35+	2.73%	1.09%	2.00%	4.38%	89.80%	0.00%
unknown	4.83%	2.43%	7.82%	57.86%	20.55%	6.52%
Grand Total	16.53%	15.10%	22.13%	21.65%	24.52%	0.07%

# Research conducted to develop or implement tools to assess the age of end-users on Snapchat

Snap reported it undertook research to 'investigate the role that infrastructure such as app stores and device operating system accounts may be able to play in providing an industry-wide solution to age verification through device signals.' Snap identified research undertaken by other organisations including the Family Online Safety Institute (FOSI) report 'Making Sense of Age Assurance: Enabling Safer Experiences Online' and research commissioned by the United Kingdom Information Commissioner's Office and Ofcom on 'Families' attitudes to age

<u>assurance</u>'. eSafety notes these examples are not research undertaken by Snap in relation to developing or implementing tools to assess the age of end-users on Snapchat, but instead they are external research conducted more broadly on the topic of age assurance.

#### Reporting end-users under 13

Snap stated from 1 January to 31 July 2024 users could report another end-user as being under the age of 13 in three ways:

- Through the Snapchat Support webform this required five steps:
  - 1. On the Snapchat Support webform at <a href="https://help.snapchat.com/hc/en-gb/requests/new?lang=en-GB&start=5153567363039232">https://help.snapchat.com/hc/en-gb/requests/new?lang=en-GB&start=5153567363039232</a> select 'I want to report an account or content'
  - 2. When asked 'Would you like to report this issue from the Snapchat app?', select 'No, I can't report this issue in the Snapchat app'.
  - 3. Tap on the violation or issue you'd like to report to proceed (select 'The person is under the age of 13')
  - 4. Select 'The person is under the age of 13'.
  - 5. The reporter provides details of the report and selects 'submit'.

eSafety notes the webform<sup>148</sup> required the reporter to submit several pieces of information to complete the report, including:

- o the reporter's name, email, username and age
- where the reporter saw content about the person who is suspected of being under 13 (for example Chats, Story)
- o the age of the reported account holder (18+, under 18 or unknown)
- o a description of the violation, and any links to content to support the report.
- In-app by pressing and holding on the chat or media in question this required four steps:
  - 1. Hold down on the content or media in question.
  - 2. Select 'Report'

<sup>&</sup>lt;sup>148</sup> Snapchat (n.d), 'Submit a request - Snapchat Support', accessed 28 October 2024.

- 3. Select any reporting category149 (there may be follow-up categories to select, depending on the initial category the reporter chooses).
- 4. In the provided comment box, the reporter provides details of their report (such as that they are reporting a user for being underage) and selects 'Submit'.
- In-app by navigating to a user's profile this required six steps:
  - 1. While at another Snapchat user's profile, select 'Manage Friendship'
  - 2. Select 'Report'
  - 3. Select 'They're posting inappropriate content'
  - 4. Select 'False information or deceptive practices'
  - 5. Select 'Something else'
  - 6. In the provided comment box, the reporter provides details of their report and selects 'submit'.

Snap stated it 'previously offered a dedicated in-app mechanism for reporting accounts suspected to be held by users under the age of 13. This feature was discontinued in 2022 due to a high proportion of reports being unactionable. However, we will be testing a new in-app reporting option to report accounts suspected of being under the age of 13 with the hope of reintroducing this feature.'

eSafety notes the in-app reporting mechanisms provided to users of Snapchat between 1 January and 31 July 2024 were difficult to navigate and confusing for the reporter. To make an in-service user report, the reporter had to select reporting categories that were unrelated to the issue they wished to raise (for example, a user had to select that the under-13 user was 'posting inappropriate content' and then click on two other unrelated categories to get to a comment box and then had to provide details of the under-13 user they wished to report in a comment box. Snap did provide a reporting option through the Snapchat Support website which did include a specific option to report under-13 users.

Snap has since reported to eSafety it has improved its in-app reporting mechanisms. Snap reported on 15 October 2024 it introduced a specific category of 'They may be under the age of 13' to assist Australian users making an in-app report directly on Snaps, Stories, Chats and accounts. eSafety notes, although Snap has introduced the specific in-app reporting category,

<sup>&</sup>lt;sup>149</sup> Snap reported a wide range of reporting categories were available such as 'Bullying, harassment and defamation', 'nudity and sexual content', threats, violence and dangerous behaviour', 'hate speech, terrorism and violent extremism', 'drugs and weapons', 'suicide and self-harm', 'false information or deceptive practices', 'intellectual property' and 'other'. The options did not include a specific category to report under-13 users.

users are still required to complete a form which requires multiple pieces of information from the reporter:

- New option for reporting chat or media content in-app this requires four steps:
  - 1. Hold down on the content or media in question
  - 2. Select 'Other'
  - 3. Select 'They may be under the age of 13'
  - 4. The reporter provides details of the report and select 'Submit'.
- New option for reporting accounts in-app this requires six steps
  - 1. While at another Snapchat user's profile, select 'Manage Friendship'
  - 2. Select 'Report'
  - 3. Select 'They're posting inappropriate content'
  - 4. Select 'Other'
  - 5. Select 'They may be under the age of 13'
  - 6. The reporter provides details of the report and select 'Submit'.

### **TikTok**

#### Use of tools to assess the age of end-users

As set out in the table on page 38, TikTok reported it uses a neutral age gate, proactive language analysis technology, and AI profiling and inference models to assess the age of endusers.

TikTok also reported the following tools or processes to assess the age of end-users:

- Signposting the minimum age of the TikTok mobile app in the Apple App Store is 12+<sup>150</sup>, and TikTok is listed as 'Parental Guidance Recommended' in the Google Play Store so that parents, guardians and caregivers can block their children from downloading TikTok if they wish by using the relevant app store's parental control features.
- Human moderation queues if a suspected user under 13 is detected, TikTok used tools
  to place the account in a queue for review by their underage moderation team. TikTok's
  human moderation team also 'age tags' accounts as under 13, under 16 or under 18 to
  restrict access to certain features or ban the account. TikTok reported moderators in
  these teams undergo specialised training on TikTok's minimum age requirements,

<sup>&</sup>lt;sup>150</sup> App stores typically provide their own age ratings which do not necessarily align to the age classifications of the services.

including with respect to visual signals and verbal/written suggestions/admissions that indicate a user may be under 13, and the relevant actions to take if they suspect a user is under 13. TikTok also reported that, more broadly, human moderators from other teams are trained to be alert for signals that indicate an account may belong to a user under 13, or a 'younger user' (13 to 17), so they can transfer the account to the dedicated underage moderation queue when required.

- Reporting tools more information on TikTok's reporting tools is set out on page 94.
- Restrictions on changing age in account settings if a user wished to change their declared age, they are required to lodge a service request with TikTok user support, which is forwarded to a team that asks the end-user to provide an ID to verify the user's date of birth. If the user satisfied this process, TikTok updated the user's date of birth.
- Cross account assurance TikTok stated that a user's TikTok account can be used to log into associated apps such as TikTok Notes. TikTok reported that if an end-user is suspected of being under 13, any enforcement decision or outcome of an appeals process will be applied to all applications which use the same TikTok account.
- Suspension tools, appeal and age assurance tools:
  - o If an account is believed to belong to an end-user under 13, the account will be banned. If an account is believed to be a 'younger user' (13 to 17), access to certain features will be removed. Both these actions can only be reversed in the event of a successful appeal. TikTok reported that users are notified of the action taken and offered the opportunity to appeal. If the user elects to appeal, they are asked to provide their date of birth (using the neutral age gate) and the following options are provided.

Users who state they are over 18 can choose to appeal by taking one of the following actions:

- Uploading their government issued photo ID along with a selfie of them holding that ID and a unique code supplied by TikTok.
- Making a credit card authorisation (which is temporary and refunded).
- Using facial age estimation, by submitting a selfie which is sent to Yoti's facial age
  estimation tool, or by using Jumio's 'ID Check' tool. This process involves uploading
  government issued-photo ID along with a selfie holding that ID and a unique code
  supplied by TikTok.<sup>151</sup>

<sup>&</sup>lt;sup>151</sup> TikTok stated that Jumio accepts any legal government issued ID including (but may not be limited to) ID card, driver's license or passport.

Users who state they are 13 to 17 can choose to appeal by taking one of the following actions:

- Using the 'ID Check' tool provided by Jumio.<sup>152</sup>
  - Asking a parent/guardian to confirm their age by having them provide their email address, confirming the user's date of birth by scanning a QR code provided by TikTok, and making a credit card authorisation.
  - Uploading a selfie with a trusted adult (who is aged 25 or older) holding a piece of paper on which is written the user's date of birth, the words 'TikTok proof of age' and a unique code supplied by TikTok.
  - As soon as the selected appeal option has been completed, TikTok commences the process of deleting the information submitted for the purposes of the appeal, including selfies, photos of ID and email addresses.
  - o If the user's appeal is unsuccessful, either the account ban will remain in force, or for users 13 to 17 their access to relevant features will be restricted. TikTok takes certain technical steps to enforce an account ban which eSafety has chosen not to publish to ensure that these measures are not circumvented.

# TikTok's assessment of the accuracy of its tools for approximating age

TikTok reported it undertakes assessments of the accuracy of its tools in a number of ways. TikTok provided the following examples of assessments it undertakes:

- TikTok employs Data Science teams (some of which are located in Australia) who have the responsibility of generating actionable insights based on the performance data of each model. The data is observed daily and the insights are then generated on a weekly to monthly basis, allowing TikTok to incrementally improve its models. TikTok stated several different metrics are used as part of this process, and provided the example of a 'recall' metric to identify how many under-13 users are successfully detected by TikTok's models. TikTok also stated the Data Science team 'might also leverage baseline metrics to evaluate a model's performance, using these as benchmarks to ensure that each iteration of the model demonstrates a measurable improvement over the previous version'.
- TikTok stated its APAC Advisory Council is a group of independent experts that advise the company on safety and digital well-being matters across the Asia-Pacific region, and that the Council discussed issues regarding child safety and age verification as recently

<sup>&</sup>lt;sup>152</sup> TikTok stated that Jumio accepts any legal government issued ID including (but may not be limited to) ID card, driver's license or passport.

as August 2024. While the Council does not specifically assess the accuracy of each tool in successfully identifying under-13 users or users aged 13 to 17, TikTok stated the Council is a key resource for TikTok to ensure it adopts a best practice approach in this space.

• TikTok stated it establishes focus groups with TikTok's human moderators, conducts indepth policy experiments and training, and consults with external parties to develop TikTok's policies on enforcement of age restrictions for under-13 users and users aged 13 to 17. TikTok stated focus group discussions with moderators across different regions can help identify which signals are most reliable, or to identify which signals need to be better understood by moderators or more aptly explained in TikTok's policies.

## Research conducted to develop or implement tools to assess the age of end-users on TikTok

As set out in the table on page 48, TikTok reported it undertook research to develop or implement tools to assess the age of end-users on TikTok. These were the aims of the various research activities undertaken:

- To research new vendors that may be able to improve TikTok's provision of existing age assurance tools, and to research vendors who may be able to provide new means for verifying the age of account holders.
- To establish a global multi-stakeholder initiative on age assurance TikTok reported it has worked with Microsoft to establish a multi-stakeholder initiative on age assurance. Members of the group are drawn from other industry partners, including leading safety and privacy organisations such as WeProtect Global Alliance and the Centre for Information Policy Leadership. Stakeholders met at the end of March 2024 in London to discuss developing evidence-based, child-informed, and risk-based approaches to age assurance. TikTok reported this group is establishing four working groups on key themes including law and regulation, horizon scanning, global and regional perspectives and risk assessments. Further dialogues have occurred since March 2024 and TikTok is exploring hosting a similar event in Sydney.
- To identify and evaluate new opportunities for TikTok's proactive detection models –
  TikTok provided an example of its Data Science teams identifying and analysing model
  fluctuations which revealed an emerging trend of users wearing masks in attempts to
  evade proactive detection models. Its Data Science teams shared those insights with the
  relevant teams so they could address the issue by building new models, tweaking
  existing models, and updating moderation policies and training for the human
  moderation teams.

• To improve user safety and the digital well-being of TikTok's users – TikTok stated its Safety Advisory Council advises the company on a range of matters, including in relation to age assurance, to improve user safety and the digital wellbeing of TikTok's users.

#### Reporting end-users under 13

TikTok provided the following information regarding the steps to submit an in-app report of a suspected user under 13 on TikTok:

- An account level report (reporting a user profile) this requires four steps:
  - 1. On the user's profile tap the 'Share' button for the mobile app, or the 'More options' button for the web browser app
  - 2. Select 'Report' and 'Report account'
  - 3. Select 'User could be under 13 years old'
  - 4. Select 'submit'.
- A content-level report (reporting videos or LIVE content):
  - Video content 3 steps
  - 1. On the user's profile tap the 'Share' button on the side of the video or press and hold on the video for the mobile app; or the 'More options' button for the web browser app
  - 2. Select 'Report' and select reason
  - 3. Select 'Submit'.
    - o LIVE content 4 steps
  - 1. On the LIVE, tap the 'Share' button on the side of the video or press and hold on the video for the mobile app
  - 2. Select 'Report' and 'Minor safety'
  - 3. Select 'Suspected underage user'
  - 4. Select 'Submit'.

TikTok stated users can also report in-service on direct messages following the same steps set out for reporting video content. However, TikTok stated that it encourages users to report via the Account Level reporting process as there are no visual indicators in direct messages which indicate a user's age, which may lead to spam or unreliable reporting.

- Webform for parents and guardians 7 steps
  - 1. Go to www.tiktok.com

- 2. Select 'Safety'
- 3. Select 'Guardian's Guide'
- 4. Select 'How do I report someone under 13 on TikTok?'
- 5. Select 'Report an underage account on TikTok' and 'Reporting Form'
- 6. Complete Form<sup>153</sup>
- 7. Click 'Submit'.

#### **Parental consent processes**

Although TikTok reported it did not have parental consent processes in place at sign-up to confirm the age of account holders, TikTok stated there are some processes which involve parents or guardians. These include the following:

- During an appeals process if a user appeals an under-13 user ban they may select appeals options which can involve parents or guardians or trusted adults providing information to confirm the age of the suspected under-13 user.
- Family Pairing on TikTok allows parents, guardians and younger users (13 to 17) to customise their safety settings based on individual needs:
  - o A parent/guardian can link their TikTok account to the younger user's account and set controls, including applying 'Restricted Mode' which restricts exposure to content that may not be appropriate or comfortable for them. TikTok notes this is in addition to TikTok's 'Content Levels' which ensure certain types of content (based on their maturity rating) are restricted to users who are 18 or older.
  - o Family Pairing enables controls such as checking daily screen time, muting push notifications, filtering keywords to filter out videos that contain certain words, getting notifications if the younger user unlinks their account, controlling what the younger user can search for, setting 'Discoverability' to private or public (noting that for 13- to 15-year-olds their account is set to private by default), deciding whether the account can be recommended to others, restricting who the younger user can send direct messages to or turning off direct messaging completely, and deciding who can comment on the younger user's videos or disable comments completely.

<sup>&</sup>lt;sup>153</sup> eSafety understands the webform prompts the reporter to provide their contact information (email is mandatory, username is optional), and details of what the user wishes to report, with the option to provide up to 10 attachments such as screenshots. TikTok (n.d), 'Guardian Guide', accessed 28 October 2024.

#### **Twitch**

#### Use of tools to assess the age of end-users

As set out in the table on page 38, Twitch reported using tools and technologies to detect and assess the age of end-users. In addition to those tools and technologies, Twitch also reported it provided reporting mechanisms for end-users to report other users as being under 13 (more detail set out in the section below) and that Twitch may perform a check of identification documents based on certain actions which could be indicative of an under-13 user – for example, a change of age upon application for monetisation.<sup>154</sup>

#### Reporting end-users under 13

Twitch stated reporting tools are available on each Twitch channel and these can be used to report an under-13 streamer or chatter, or a private message through Whispers. Twitch reported logged-out user reporting is not currently available, but Twitch intends to launch this function in Australia soon.

Twitch reported it takes four steps to report an end-user as potentially being under 13 through the in-service reporting tools for streams and Whispers:

- 1. Click the three dots menu below the stream video or a direct message in Whispers
- 2. Click 'Report livestream'
- 3. Selection reason for report ('Other' 'Underage User')
- 4. Click 'report'.

Twitch stated that the steps on the mobile app are substantially similar.

#### YouTube

#### Reporting end-users under 13

YouTube provided in-service reporting options for videos or channels, however this directed the reporter to a webform.

Google stated that YouTube does not have a standalone reporting category for users to submit reports of potential under-13 users. A user report would have to use the 'other legal issues'

<sup>154</sup> Twitch stated that they require official, government-issued documentation that is valid, current, and displays the user's full name, date of birth, and photograph. Twitch advised eSafety that they can accept multiple pieces of documentation and that each piece must include at least two of the three required elements.

sub-category in the legal issues report form to report issues associated with any underage users. In the 'other legal issues' webform, the user would be required to:

- 1. Select Australia as the relevant country
- 2. Enter their full legal name
- 3. Confirm that they are acting on their own behalf (or, alternatively, on behalf of a client)
- 4. Cite the specific law that the content is allegedly violating, or the area of the law from which they believe the issue arises
- 5. Provide a hyperlink to the specific law
- 6. Indicate where the alleged violation occurs (with a choice of video, channel, comment or other) and provide the specific URL that links to the content at issue
- 7. Explain how the content allegedly violates the law
- 8. Confirm that the information they are providing is true and accurate
- 9. Type out their full name to act as a digital signature.

#### Parental consent processes

In addition to the information set out on page 54 regarding parental consent, Google stated that YouTube offers a supervised experience, which is a parent-managed version of regular YouTube and YouTube Music for children under 13 (or relevant age of consent for their country/region).

- This parental supervision is mandatory for Google Account holders under the age of 13 (or below the age of consent for their country/region).
- Parents may select a particular content setting for their child, and are given detailed information about what content falls within each setting.
- On the basis of the selection made by the parent, users in Supervised Experience will
  only be able to view content that is in the selected age band, including
  recommendations and search results. This applies also to content accessed via a linked
  URL.
- Other parental controls include disabling autoplay and reviewing, pausing, and clearing
  watch history. For these accounts, Google also defaults wellbeing protections to on, and
  disables a number of standard features normally available in YouTube, such as the
  ability to create content or write comments.

