



**Written Submission of Reddit, Inc. in response to  
the Draft Online Safety (Basic Online Safety Expectations) Amendment Determination 2023**

**Executive Summary**

- The proposed amendments to the Basic Online Safety Expectations (BOSE) should be reasonable and proportionate, to ensure that these changes will achieve the policy intent of the BOSE without subjecting smaller and differentiated platforms to unnecessarily onerous obligations. The expectations should take care to not have the unintended effect of harming the ability of smaller and less mature platforms to compete, or of requiring such service providers to divert their more limited resources away from efforts to identify and remove harmful content in an effort to satisfy the most burdensome of the proposed changes. To that end, a threshold should be applied to the application of the proposed “best interests of the child” expectation in draft clause 2A and platforms should be allowed to take “reasonable steps” when responding and providing feedback on user reports in draft clause 14.
- The value of greater transparency must be balanced against the freedom for platforms to develop their own tooling and processes, without exposing these tools and processes to bad actors. It is also important for platforms to be able to keep commercially sensitive information confidential in order to maintain their competitive autonomy. Accordingly, we have suggested revisions to draft clause 18A to promote these principles, as well as seeking further clarification on the user metrics used in clause 18A and draft clause 20(5) to better align with industry practice.

**Introduction**

Reddit welcomes the opportunity to comment on the draft Online Safety (Basic Online Safety Expectations) Amendment Determination 2023 (the draft Amendment Determination) and we thank the Department for proactively engaging with industry on this important issue.

Reddit is a medium-sized company with approximately 2,000 employees worldwide. Headquartered in San Francisco, the company opened an Australian office in Sydney in July 2021. Reddit’s platform serves more than 70 million daily active unique users worldwide, more than 90% of whom are over the age of 18, and Australia forms our fifth largest user base.

Reddit provides a forum-like platform for people to create self-governing communities of shared interests, known as “subreddits”. Each subreddit has its own set of rules specific to the community, which are enforced by volunteer community leaders (known as moderators, or “mods”). Moderators are empowered to take action against content and users, to help shape the culture of their community and ensure that members have a positive experience. Individual users also play an important role in Reddit’s governance by voting on content; content that is voted up rises in visibility, while content that is voted down drops in visibility. Overarching these networks of subreddits and users is Reddit’s [Content Policy](#)<sup>1</sup>, set by the company and enforced across the entire site by Reddit’s safety teams. In

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<sup>1</sup> <https://www.redditinc.com/policies/content-policy>



this layered, democratic system, Reddit users, moderators, and the company all share some responsibility for the safety and governance of the site.

Our platform is designed to empower users and give them the ability to determine what content should and shouldn't be included in their community, through the norms and rules established by mods and the upvotes and downvotes of users, backed up by our internal safety teams' enforcement of our sitewide rules. Rather than promoting individual accounts or encouraging users to connect with one another or build their social profile, the purpose of Reddit is to enable well-moderated, rules-based conversation on the basis of users' shared interests. In this way, our community driven layered moderation approach scales with the size of our users, making it the most sustainable and effective content moderation model online.

We have been observing the operation of the Basic Online Safety Expectations (BOSE) in Australia and commend the intention of the draft Amendment Determination to update the BOSE and ensure that it is achieving its initial objectives. From our position as a community-first platform with a unique approach to content moderation, we are pleased to provide our feedback on the draft Amendment Determination.

## **1. Expectations Must Be Reasonable and Proportionate**

The safety of our users is of the utmost importance to Reddit, and we continue to develop and refine our tools and policies to ensure users are able to use our platform safely. We take special care to share our enforcement actions via a biannual transparency report,<sup>2</sup> as well as quarterly updates with our community and moderators around enforcement numbers and new tools or features we've rolled out on [/redditsecurity](https://www.reddit.com/r/redditsecurity).<sup>3</sup> For example, in 2023, we updated Rule 3 of our Content Policy to [more specifically address AI-generated sexual media](#)<sup>4</sup> and make clear that sexually explicit AI-generated content that depicts a real, identifiable person violates our rules. We also expanded the scope of Rule 4 to prohibit [non-sexual forms of abuse of minors](#)<sup>5</sup> (e.g., neglect, physical or emotional abuse, including, for example, videos of things like physical school fights), in addition to already prohibiting sexual abuse of minors. We became a partner organisation of StopNCII.org in 2023 and launched our implementation of StopNCII's hash tool, which helps to quickly find, remove, and/or prevent the upload of non-consensual intimate media.<sup>6</sup> We are a founding Board Member of the [Digital Trust & Safety Partnership](#),<sup>7</sup> which aims to establish industry best practices that are flexible to a diverse range of company sizes and business models. We were also an active contributor to the development of Australia's first online safety industry codes and applaud the Office of the eSafety Commissioner for its consistent engagement with industry on crucial matters of online safety.

It is vital that any online safety measures are reasonable and proportionate, to ensure that policy objectives are achieved without unduly burdening smaller platforms or harming their ability to compete. This approach is well-reflected in the online safety industry codes, where the position paper

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<sup>2</sup> <https://www.redditinc.com/policies/2023-h1-transparency-report>

<sup>3</sup> <https://www.reddit.com/r/redditsecurity>

<sup>4</sup> <https://support.reddithelp.com/hc/en-us/articles/360043513411>

<sup>5</sup> <https://support.reddithelp.com/hc/en-us/articles/1713061569896/>

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<https://support.reddithelp.com/hc/en-us/articles/360043513951-What-should-I-do-if-someone-has-shared-or-threatened-to-share-intimate-images-of-me-or-somebody-I-know->

<sup>7</sup> <https://dtspartnership.org/>



states that the requirements of the code are to be “reasonable and proportionate”.<sup>8</sup> To that end, we strongly encourage changes to the draft Amendment Determination that ensure that this principle is achieved, with a particular focus on two proposed additional expectations – “the best interests of the child” expectation (draft clause 2A) and “timely resolution of complaints and reports” (draft clause 14(3)).

#### *A. Threshold for the Application of the “Best Interests of the Child”*

Fundamentally, the Internet is a place built for people of all ages and backgrounds, with spaces specifically built for groups of users based on their characteristics and/or interests. This includes age, with some websites targeted at children and some targeted at those aged 18 and above. Reddit is one such platform that is primarily used by, and targeted to, adults, with more than 90% of our users globally being above the age of 18. The intended use of our platform by adults is also reflected in Reddit’s app store rating of 17+ on the Apple App Store, which allows Reddit to leverage device-level parental controls. This is also reflected in findings by the Pew Research Center, which reported that of teenagers aged between 13 and 17 surveyed, only 14% stated that they had ever used Reddit.<sup>9</sup>

While Reddit is a platform geared towards adults, we nonetheless take minor protections extremely seriously and have tools in place on Reddit to ensure minors are able to use our platform safely, including the age gating of certain content. We believe that the intent of these platforms targeted at adults, and users’ experience of the Internet more generally, should be respected. The Internet is, by design, open, which means that any user can access or use any part of the Internet that they choose – this could include children, even if the service is not intended for children, and the service is, in reality, rarely used by children.

The proposed clause 2A is extremely broad-ranging, likely to apply to almost all websites on the Internet, including websites that are not intended to be, and are indeed rarely, used by children. This could have the effect of unduly burdening these websites without achieving its primary objective of protecting children, and damaging the experience of other users online in the process. In this context, it is important to bear in mind that not only is the Internet a place to seek information, but also support and connection. Subjecting websites to more onerous obligations could effectively stymie, and in some cases completely remove, users’ access to important resources. To that end, we would urge the application of the principle of proportionality to any requirement relating to the use of the Internet by children and the potential or likelihood for harm.

We are also concerned with the phrase “the best interests of the child”, which is a vague and difficult concept to implement in the context of online platform regulation. While the term is well understood in the context of family law, in cases assessing specific interests of a specific child or siblings, it is difficult to see how it would apply in a digital context and to thousands, possibly millions, of individual children. Every child is an individual and it is not possible to know what may be in any one individual’s best interests. In our view, the application of any standard should be limited to websites specifically marketed to children, and/or for which minors represent a predominant proportion of the user base. To have such a high standard of conduct apply to almost every, if not all, website on the

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<sup>8</sup> Office of the eSafety Commissioner, [Development of industry codes under the Online Safety Act: position paper](#), September 2021, p 6.

<sup>9</sup> Pew Research Centre, [Teens, Social Media and Technology 2023](#), 11 December 2023.



Internet would be overbroad and onerous, without necessarily protecting children and instead, damaging users’ experience of the Internet.

To help ensure the objectives of the amendment are achieved, a more appropriate and workable standard should be proposed to be included in the draft Amendment Determination. In addition, further guidance should be provided to service providers subject to the proposed clause to illustrate how this standard would be expected to operate in practice.

**Recommendation:** Revise the proposed clause 2A to establish a more appropriate and workable standard, with further guidance to be provided to service providers subject to the proposed clause.

***B. Providers Should Be Allowed To Take Reasonable Steps***

User reports serve an important function in the enforcement of community guidelines and broader site-wide rules. In the first half of 2023, Reddit received 15,611,260 user reports for potential Content Policy violations in posts, comments, and private messages.<sup>10</sup> 9.9% of these reports resulted in a removal action by our internal safety teams; the remaining 90.1% were either duplicates, already actioned by moderators, or the reported content did not violate our rules.

These figures provide some context to the volume of reports that our internal safety teams handle, and it is important to note that not all reports are submitted in good faith. To provide further context, from January to June 2023, we received thousands of user reports of report abuse.<sup>11</sup> To require platforms to provide feedback on every report submitted – including bad faith or spam reports – would hamper platforms’ ability to respond to the abusive use of their services while doing nothing to increase transparency for good faith users or to facilitate the removal of harmful content online. Indeed, it may even have the inverse effect and reduce the timeliness and effectiveness of our internal teams.

Accordingly, we recommend the inclusion of “reasonable steps” to the draft clause 14(3) – the inclusion of reasonableness would help account for these types of situations; otherwise, the requirement presents a disproportionate operational burden by limiting platforms’ options in the face of potential abuse of reporting tools, taking away resources from good faith reporters. Again, this is consistent with the “reasonable and proportionate” principle discussed above and as adopted on an overarching basis to the online safety industry codes.

**Recommendation:** Amend clause 14 to:

- (3) The provider of the service will, within a reasonable period of time:
- (a) review and respond to reports and complaints mentioned in sections 13 and 15; and
  - (b) **take reasonable steps** to provide feedback on the action taken.

<sup>10</sup> 2023 Transparency Report, see “User Reports” section under “Content Removals”.

<sup>11</sup> For further information on report abuse, see: <https://support.reddithelp.com/hc/en-us/articles/213099246>



## 2. Promoting Transparency While Safeguarding Platform Tooling

“Default open” is one of Reddit’s core company values,<sup>12</sup> and we are committed to promoting transparency in our communities and on our platform. Every six months, we publish a comprehensive transparency report,<sup>13</sup> which provides recurring insights and metrics about content and communities removed from Reddit during the given time period (including content proactively removed as a result of automated tooling), accounts that were suspended, and legal requests received from governments, law enforcement agencies, and third parties to remove content or disclose private user data from around the world.

Since 2023, we have moved to publishing this report from an annual to a bi-annual cadence, to provide deeper analysis across a shorter period of time and further enhance our commitment to transparency. In 2023, we also established a [Transparency Centre](#),<sup>14</sup> a one-stop shop for all our past transparency reports and other policy and safety resources to keep our users informed and empowered. In addition, we regularly post updates to our users in relevant subreddits (such as [r/redditsecurity](#),<sup>15</sup> a subreddit where we post updates on actions to ensure the safety and security of Reddit) and directly respond to users’ comments on issues of concern, rather than simply posting a static, one-way blog spot. We believe that by maintaining open communication with our users, we can more effectively empower our communities.

However, a balance needs to be struck between transparency and protecting a platform’s ability to prevent bad actors from gaming the system. Too much transparency can also risk revealing commercially sensitive information, such as proprietary information about our safety tooling which may be particularly detrimental for smaller platforms seeking to compete and innovate against larger ones. Accordingly, we recommend amending the proposed additional expectation 18A (provider will publish transparency reports) to help achieve a balance between these competing risks.

First, we recommend removing draft clause 18A(1)(b). The safety tools and processes deployed by a service provider and their effectiveness do not need to be made publicly available in a transparency report – it could actually have the harmful effect of revealing a platform’s tooling and processes to bad actors, allowing them to evade detection and identification. Protecting systems from malicious or bad faith actors is an endless game of cat and mouse, and the proposed reporting requirements could tip off mice on where they should focus their evasion tactics. Instead, rather than having this information published in public transparency reports, we propose that the Commissioner be provided with the power to request this information in clause 20, which would be shared on a confidential basis. This would allow the Commission to assess the extent to which safety tools and processes are (or are not) adequate, while maintaining the confidentiality and effectiveness of these tools.

Second, we propose removing draft clause 18A(1)(d) and encourage further consideration of draft clause 20(5). From the perspective of a medium-sized, privately-held company operating in a highly competitive environment, our user numbers are commercially sensitive information. To require us, and other similar platforms, to publish such information on a monthly basis could be commercially damaging and allow competing platforms to take advantage of this information, to the detriment of

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<sup>12</sup> <https://www.redditinc.com/blog/sharing-our-company-values>

<sup>13</sup> <https://www.redditinc.com/policies/2023-h1-transparency-report>

<sup>14</sup> <https://www.redditinc.com/transparency>

<sup>15</sup> <https://www.reddit.com/r/redditsecurity/>



smaller platforms. For example, it would give competitors sensitive insight into month-to-month trends. Even for public companies, the cadence is far beyond the quarterly reporting standard. Moreover, draft clause 20(5) already provides for the Commissioner to request the same information from a service provider; given this power, there is no reason to require a platform to make this information publicly available.

With respect to draft clause 20(5), we encourage further consideration to be given to the metric of “the number of active end-users of the service in Australia (including children) each month during the relevant reporting period”. For one, it is unclear what “active” means – it could mean a user that has a registered account on a platform and takes some action on the platform (for example, make a post or comment) during a given period of time. Or, it could extend to users that do not have accounts and are merely visiting a website, maybe for only fractions of a second. The second type of user would have a materially different experience than a registered user that has an active presence on a website. On Reddit, for example, a non-registered user would not be able to post or comment, join or create communities or vote on content, all of which are key functionalities of our service. The type of data collected by our platform also differs depending on the user’s registration status. We also note that draft clause 18A(1)(d) provides for a monthly timeframe in providing the number of active end-users in Australia. This is a common metric used in many regulatory discussions; however, it is not a universal industry standard. Reddit, for example, currently counts daily active unique users, largely owing to the specific structure of our website.

Consequently, it is important to consider the distinction between registered and non-registered users, and the type of timeframe to be adopted, in user number metrics. In our view, clarifying the meaning of “active”, specifying registered users, and taking into account variations in how websites record user data would help improve the type of information collected and ensure that alternate or smaller platforms are not unnecessarily disadvantaged by the burden of requests.

**Recommendation:**

- Move draft clause 18A(1)(b) to clause 20, enabling the Commissioner to request service providers to provide the safety tools and processes deployed by the service (including in relation to a service’s key features), and their effectiveness
- Remove draft clause 18A(1)(d), noting that draft clause 20(5) provides the Commissioner with a similar power.
- Further refine the user metric in draft clause 2(5) to specify registered users.

**Conclusion**

The draft Amendment Determination is a step in the right direction to updating the Basic Online Safety Expectations and ensuring that it remains fit for purpose. As with any online safety policy, it is important to bear in mind the balance between ensuring the safety of users online while respecting users’ experience of the internet and the intended use of services on the Internet. We hope that our feedback on the draft Amendment Determination will assist in further clarifying and refining certain concepts, while maintaining a sense of proportionality and preserving the intentions and competitiveness of platforms.