

05 April 2023

Parliamentary Joint Committee on Law Enforcement
PO Box 6100
Parliament House
Canberra ACT 2600



Via email: le.committee@aph.gov.au.

Dear Committee Members,

Thank you for the opportunity to provide a submission to the Committee on the inquiry into law enforcement capabilities in relation to child exploitation.

Our submission outlines Twitch's general approach to safety, as well as the specific measures we have adopted to prevent, identify, and report child sexual exploitation and abuse (CSEA).

Eradicating child exploitation requires collective and constant participation from every corner of the internet. Bad actors evolve, and our work to thwart their efforts will never be done. We will continue to aggressively expand the technologies, industry relationships, and internal processes we leverage to prevent users under 13 from using Twitch, and to prevent groomers from causing harm to others using our service. At the same time, our commitment to continue working alongside our industry peers, partners, and law enforcement organizations to share learnings and present a more unified front to preventing and combating child harm remains steady.

We hope that this submission supports the Committee in their understanding of our service, and the policies, products, and processes we have in place to combat CSEA.

Sincerely,

Olaf Cramme,
VP, Global Public Policy

Twitch's Approach to Safety

At Twitch, we strive to create welcoming, interactive communities where people from all around the world can express themselves safely and find belonging. Our goal is to foster an environment together that supports and sustains streamers, welcomes and entertains viewers, prioritizes safety, and minimizes harm.

As a livestreaming service designed around live, ephemeral content, Twitch requires a unique approach to safety. Content moderation solutions that work for other services, such as content removal, often don't work in the same way for Twitch. Furthermore, the needs of streamers and communities that share their passions on Twitch vary from channel to channel, and even from stream to stream. This means that, for Twitch, safety cannot be one-size-fits-all.

We've developed a unique approach to safety that balances consistent sitewide safety standards with more personalization at the channel level. In this approach, every member of the Twitch ecosystem—streamers, moderators, viewers, and our own Twitch staff—has a role to play. This allows us to create a nimble and responsive sitewide safety experience, while still giving streamers the channel-level control they need to cultivate a unique community in their channel.

Our [Community Guidelines \(CGs\)](#) lay a sitewide foundation for safety. The CGs prohibit harmful behaviors that violate our values as a global community. Streamers and their volunteer moderators use Twitch safety tools to ensure these standards are met within their channel, while further tailoring the customizable settings we provide according to their stream's unique needs. Twitch also empowers viewers to report users or behaviors that break our CGs, as well as to set additional controls for the types of content they want to see. Our global Safety Operations team works in tandem, 24/7/365, to respond swiftly to these user reports and help mitigate further harm.

Behind the scenes, we continually update our safety technology, including proactive detection filters we use as an important first line of defense. We also prioritize having a human in the loop to stay ahead of bad actors through deep dive investigations, and to ensure Trust & Safety processes stay accurate and fair for our community members.

We call this safety infrastructure our "layered approach." For more information regarding our layered approach to safety, please see our most recent [Global Transparency Report](#), which includes a summary of recent safety updates.

Twitch's Work to Combat Child Exploitation

To combat child sexual exploitation and abuse (CSEA), we invest in a number of approaches that, taken together, seek to provide a comprehensive response to this complex and constantly evolving challenge: we focus on keeping children under 13 off our service; we deploy tools and technologies to prevent harm and identify potential cases of CSEA; we have a dedicated specialist team carrying out 'deep dive' investigations; and we collaborate actively and closely with experts and industry partners. The following outlines these efforts in more detail.

To begin with, we do not allow children under 13 on Twitch (and our Terms of Service requires that users between the ages of 13 and the local age of legal majority may only use Twitch under the supervision of a parent or legal guardian). We immediately suspend all accounts for users who claim or are confirmed to be under the age limit. If there is any ambiguity but we suspect the user is under the age limit, we suspend the account and require age verification before it is reinstated. If the individual cannot satisfy the age verification process, we delete the account.

Twitch's global Safety Operations team, which operates 24/7/365, reviews all potential underage accounts, which are detected through a variety of mechanisms. We employ automated solutions that use behavioral and language cues to identify users who are likely under 13. We also have avenues for parents to reach out should they find their under-13 child has been using Twitch, and users can report streamers who appear to be underage using our in-product reporting tool. The Safety Operations team is trained to identify potential users under 13 based on detailed visual and language-based cues. We also utilize a number of automated processes—using a combination of elements such as IP address, device ID, and characters matching a past suspended user name—to block users previously suspended for being under 13 (or who were suspended for a CSEA-related violation) from creating new accounts.

To prevent any users under 13 who made accounts with false age information from going live and putting themselves at risk before we're able to identify and remove their account, we have introduced mandatory phone verification requirements before potentially vulnerable accounts are able to livestream via mobile. We do this based on content categories that are often streamed or viewed by a younger audience. Requiring verification for these categories increases the effort required by a minor to initiate a broadcast, and to create an alternate account after suspension, because Twitch can trace that number to a suspended account. Phone verification is also used to curb a potential groomer's ability to participate in chat on Twitch. We have also updated the default privacy settings for our direct messaging feature to not allow messages from strangers for all new users and existing users under 18.

In addition to our efforts to remove children under 13 and protect those who may attempt to evade our age gating, we aggressively work to prevent, detect, investigate, and report predatory behavior. Twitch has a [zero tolerance policy](#) for any content or activity that endangers youth, including content that features or promotes child sexual abuse material (CSAM), and the sexual exploitation, sexual misconduct, or grooming of youth. Additionally, in 2021, Twitch became the first service to introduce an [Off-Service Policy](#), which allows us to take action against users based on behaviors that occurred entirely off Twitch, including child grooming. This means we can—and do—remove users from Twitch when we have evidence they participated in grooming activity entirely off our service.

We use a number of automated measures to identify potential violations of our policy against child sexual exploitation, and to prevent potential predators from being able to cause harm. As Twitch is a livestreaming service, where the vast majority of content is new, live, and ephemeral (as opposed to pre-recorded and uploaded), known CSAM content does not show up on Twitch the way it does on other services, and the established tools to identify known CSAM content, like

hash matching, do not work. We must therefore take a multi-pronged approach, invent our own solutions, and adapt existing, third-party solutions to tackle unknown CSAM and grooming. For example, we utilize technologies to scan livestreams for possible nudity, which is not allowed on our service and, taken together with other signals, can also be an indicator of potential CSAM. We also apply various machine learning models to identify potential CSEA content and grooming in text.

In early 2023, we completed the months-long process of acquiring Spirit AI—an industry leader in AI for language processing—who now supports us in building and utilizing more nuanced classifiers for detecting harms of all kinds in written text on Twitch. We also block the ability to use certain search terms or phrases to find content on Twitch to reduce the ability of predators to locate channels that could be susceptible to grooming.

Twitch's Law Enforcement Response (LER) team—which is made up of highly-trained individuals around the world—is responsible for reviewing content flagged by our machine detection tools and user reports of suspected predators on Twitch. They conduct deep dive investigations into both the predators as well as the networks they interact in to collect all possible evidence, uncover additional bad actors and victims, and understand how their methods are evolving. All evidence is submitted to the National Center for Missing & Exploited Children (NCMEC) and law enforcement authorities who are able to prosecute. We have quadrupled the size of our LER team over the last two years to bolster this capability and keep our community safe.

In the first half of 2022, Twitch's LER team submitted 6,711 Cyber Tips to NCMEC, a 68 percent increase relative to the preceding half (see Twitch's [most recent transparency report](#) for more details). While it's unfortunately true that NCMEC reports are rising industry-wide, we believe part of the increase on Twitch in the first half of 2022 was driven by detection improvements throughout 2021, including significant investments in staffing, proactive detection, and user reporting. This has enabled us to take action in a higher number of cases as Twitch's audience grows. We also attribute the increase in reports to user growth for online services during the pandemic and post-pandemic period.

Twitch also works closely with other social media services and industry organizations to share learnings, and make sure we are staying ahead of emerging risks in this space. We are an active participant in the [Technology Coalition](#), which is a global alliance of tech companies who are working together to protect children from online sexual exploitation and abuse through tech innovation, research, and information sharing. Twitch is also a member of the [Family Online Safety Institute \(FOSI\)](#) and supports the [Digital Wellness Lab](#) at Boston Children's Hospital. We are also funding members of [INHOPE](#), which is a global network of 50 hotlines in 46 countries (including Australia) that provide the public with a way to anonymously report CSAM content.

Our work does not stop here. We know that predatory bad actors are constantly adapting their approaches and tactics, which is why we will continue to invest in online safety tools and collaboration models.