

# Written Submission of Reddit, Inc. In Response to the Senate Economics References Committee's Inquiry into the Influence of International Digital Platforms

#### **Executive Summary**

- Distinct from most digital platforms, Reddit is primarily a network of communities, rather than individual users. Accordingly, we take a multi-layered approach to content moderation, focused on empowering users and providing them with the ability to have a say in the type of content surfaced on the platform. This community-centric and user-first approach informs our views on the issues outlined in this submission.
- Preserving the anonymity and privacy of users is critical to ensuring the continued vibrancy
  and value of online discussions, as well as the safety of communities and users. It is crucial
  that any new laws or regulations do not unintentionally diminish the experiences of internet
  users or impinge on their right to privacy.
- Tech regulation should not be one-size-fits-all; there is a danger that adopting such an approach harms smaller businesses with innovative or novel operating models and, ultimately, industry competition, diversity and consumers. We therefore encourage lawmakers to take this into consideration when formulating proposed laws and regulations.

#### I. Introduction

Reddit is pleased to offer this submission to the Senate Economics References Committee's inquiry into the influence of international digital platforms (the Inquiry). Reddit, Inc. is a medium-sized, privately held company with around 1,800 employees worldwide. Headquartered in San Francisco, the company opened an Australian office in Sydney in July 2021. Reddit's platform serves more than 54 million daily active unique users worldwide, and Australia forms our fifth largest user base. Reddit's Australian user base is composed primarily of adults, with more than 90% being above the age of 18.

Reddit's mission is to bring community, belonging, and empowerment to everyone in the world. To do so, Reddit provides a forum-like platform for people to create and participate in self-governing communities of shared interests, known as "subreddits". We take a multi-layered, democratic approach to content moderation of these subreddits.

Given the unique nature of Reddit as compared to other online platforms, we wanted to use this opportunity to explain Reddit's unique approach to content moderation and privacy, before describing our views on a few key issues being considered by the Inquiry. As user empowerment is central to Reddit's mission, we have also included the voices of some of our Australian volunteer moderators to explain how they set rules for and approach governance of their communities. We hope that you will keep their points of view, as well the voices of smaller platforms with unique content moderation models, top of mind as you consider next steps for the Inquiry.

# II. Background on Reddit's Unique Approach to Content Moderation and Privacy

#### A. Reddit's Approach to Content Moderation

Users, volunteer community moderators, and Reddit employees each play a vital role in governance on the platform. Content moderation duties are therefore shared among a wide range of users, effectively empowering users to actively participate in their own governance.

#### Upvotes, downvotes and karma

In contrast to other sites, content on Reddit is primarily ranked and curated not by a centralised algorithm, but by the votes of the users themselves. Any Reddit user (known as a "Redditor") with a registered account can vote on each individual post and comment on the site. The content can be voted both "up" and "down" within the subreddit and the content consequently rises or falls in visibility on the page, based on these upvotes and downvotes. Through this voting system, every user on Reddit participates in the content moderation process.

The upvote/downvote system not only affects the visibility of posts and comments on Reddit, but also provides a signal about users themselves to other users, and to Reddit. Users that post or comment on Reddit have a public reputation score known as "karma", which is based on the number of upvotes and downvotes their posts and comments receive. These karma scores serve as a shorthand indicator of the quality of a user's contributions to the broader community. Users with higher karma scores are more trusted, whereas users with low or negative karma scores are less trusted. It's important to note that every Redditor's profile is public; there are no such things as private profiles on Reddit. The public nature of Reddit promotes transparency, and a user's karma score accordingly incentivises users to be constructive members of Reddit.

#### Subreddits and volunteer moderators

Redditors can create and partake in discussions in their chosen subreddit, so long as they abide by Reddit's site-wide policies¹ and the rules of the individual subreddit, which are clearly identified on the subreddit page. Subreddit-level rules are created and enforced not by Reddit employees, but by volunteer users – known as volunteer community moderators or "mods". Moderators play an active and important role in shaping their communities and providing a positive experience for users, by setting the rules of their subreddit, actively moderating participation in accordance with those rules and engaging with the community.

For example, in the words of one of their moderators, the <u>r/transgenderau</u> subreddit is a community that "focuses on transgender rights and support here within Australia and trying to provide a space where trans folks can come and get help with accessing medical care." This objective acts as its north star, guiding the rules set in the subreddit and the volunteer community team's approach to moderating the community. The moderator explains:

We try our best to ensure that the community is moderated by the community, for the community, and making sure that it is a safe space for folks to talk about issues that affect them. For us, that includes making sure that we don't allow dating and chaser content to keep the content appropriate for all ages and ensuring that folks are comfortable to post here with no judgement.

<sup>&</sup>lt;sup>1</sup> See, for example, Reddit's Content Policy (https://www.redditinc.com/policies/content-policy)

Moderators are empowered to enforce their rules, such as removing a post or comment, or banning individual users from posting within the community. They may do so manually, or using tools such as Automoderator, which is a simple automated content moderation tool that Reddit makes available to its moderators to configure as they see fit within their subreddit. These moderator actions happen without the involvement of Reddit, Inc., and form more than 95% of non-spam content moderation decisions on the platform, as noted in our annual <u>Transparency Report</u>.<sup>2</sup>

As such, volunteer community moderators are the core stewards of community culture on our site and essential to the healthy functioning of the over 100,000 active communities on Reddit. In the words of a moderator, describing how they moderate their subreddit (<u>r/ASX bets</u><sup>3</sup>):

Our users post the content on anonymous user profiles, although each profile does indeed exhibit its own personality as the user becomes more familiar with the forum and vice versa. We have posting (karma) requirements for posts, meaning our "auto moderator" will automatically delete any post not from a recognized user. Being that the users on a sub decide each individual's profile "competency" by voting them up or down in relation to their content, the playing field is self-levelling. Trusted users who post quality content get voted up, others get voted down and their content becomes harder to post. Essentially, this is the quasi-democratic system of Reddit taking effect and any democracy functions in its most truthful form as an anonymous process.

We have a dedicated Community team at Reddit that proactively engages with moderators to ensure moderators are supported and equipped with the necessary resources to help them look after their communities. These include resources, such as the Mod Help Centre, and Moderator Councils, where employees engage moderators directly to hear their feedback on everything from safety tools to the Content Policy. The Community team also manages a dedicated "Moderator Reserves" program which can supplement a subreddit's moderation team temporarily with experienced volunteers in times of special need. For example, we helped the moderators of r/NewZealand secure additional moderators through this program during the Christchurch attacks, when the subreddit became an important news resource. The volunteer reserve moderators helped provide additional time zone coverage, so that the New Zealand-based mod team could keep up with the sheer pace of events.

#### Reddit's sitewide policies and safety teams

Overarching these networks of subreddits and users is Reddit's Content Policy<sup>7</sup>. The Content Policy is set by Reddit at the company level and applies across the entire site. It forbids unwelcome things such as hateful content, encouraging violence, sharing personal information or intimate imagery without consent, and other behaviour that has no place on Reddit. Reddit's internal safety and enforcement teams enforce the Content Policy by responding to user reports and building tools to proactively identify bad behaviour, including by monitoring data signals for evidence of sophisticated commercial spammers and building hashing tools to identify known instances of harmful and illegal content.

<sup>&</sup>lt;sup>2</sup> https://www.redditinc.com/policies/transparency-report-2021-2/ In addition to our annual Transparency Report, Reddit released its first mid-year Transparency Report in 2022, which focused specifically on legal requests received from global government agencies, law enforcement officials, and other third parties to remove content or disclose account information between January and June 2022. This report represents a stepping stone towards Reddit releasing more metrics on a more frequent basis.

<sup>&</sup>lt;sup>3</sup> https://www.reddit.com/r/ASX Bets

<sup>&</sup>lt;sup>4</sup> https://mods reddithelp.com/hc/en-us

<sup>&</sup>lt;sup>5</sup> https://mods reddithelp.com/hc/en-us/articles/4415446939917-Reddit-Mod-Council-

<sup>&</sup>lt;sup>6</sup> http://www.reddit.com/r/newzealand

<sup>&</sup>lt;sup>7</sup> https://www.redditinc.com/policies/content-policy

We publish statistics about actions taken by our safety teams in our annual <u>Transparency Report</u>, sincluding content removed by Reddit employees, appeals to actions taken by Reddit and the consequent acceptance rate, and user account sanctions by Reddit. In addition, we frequently provide updates to users on actions taken to ensure the safety and security of Reddit, including a quarterly safety and security report on the <u>r/redditsecurity</u> subreddit. By using a subreddit rather than a blog post, we are able to engage in an interactive dialogue with our users about issues they are interested in, rather than just talking at them.

## B. Privacy at Reddit

Privacy is woven into the very fabric of Reddit and how our communities operate. Unlike many other platforms, we operate from the position that privacy is a right and that ultimately, users should be the masters of their own identity on Reddit. As outlined in our <u>Privacy Policy</u>, <sup>10</sup> users are empowered to disclose as much, or as little, information about themselves as they would like. In fact, our Content Policy specifically prohibits users from disclosing personal information relating to another user, or posting links that may reveal a user's personal information.

To that end, users may view Reddit and browse through subreddits without an account, and are only required to register to make a post, comment or upvote/downvote content. For users who do choose to register an account, we practise data minimisation – users are not required to provide sensitive personal information like their real names. Once registered, users are also able to delete their public posts and comments, and account information, at any time. Our privacy-centric approach is also reflected in our advertising practices, which is focused on minimising our collection of data for the purposes of advertising. We also do not, and will not, sell our users' information to others. We take our responsibilities to our users seriously and strongly believe in our privacy-centric approach to users and data collection.

# III. Reddit's Feedback on Selected Themes of the Inquiry

## A. Protect the Privacy of Internet Users Online

At Reddit, we want users to be able to engage in authentic and meaningful discussions. To fully participate in robust and vibrant online conversations, users must not be afraid for their safety or the impact of their online lives on their offline reality. We believe that the key to these concerns is anonymity, and the power for users to choose how they wish to participate and present themselves online. Anonymity not only enables frank and robust online discourse, but also ensures the privacy of users. This applies equally to pseudonymity, where users may utilise a consistent identifier online that is not their real name, in order to protect their privacy and lives offline.

There are hundreds of thousands of communities on Reddits, focused on a wide array of topics and interests. Conversations in these varied communities range from users seeking information about Australian flora (<u>r/AustralianPlants</u><sup>11</sup>) to debating the latest results from the triple J's Hottest 100 (<u>r/triplej</u><sup>12</sup>). They may also involve more sensitive issues that users may find difficult discussing in their everyday lives. For example, <u>r/povertyaus</u> is "a community that focuses on Australian low

<sup>8</sup> https://www.redditinc.com/policies/transparency-report-2021-2/

<sup>9</sup> http://www.reddit.com/r/redditsecurity

<sup>&</sup>lt;sup>10</sup> https://www.reddit.com/policies/privacy-policy

<sup>11</sup> http://www.reddit.com/r/AustralianPlants

<sup>12</sup> http://www.reddit.com/r/triplej

income earners who are trying to find ways to get by and/or get a better grip on their finances and living situations". Being able to remain anonymous in that community allows users to ask questions and discuss their own experiences frankly and without judgement. As one of the moderators of that subreddit notes:

If reddit did not have anonymity, the potential for this subreddit to grow as it has, or to do so in the future would be impacted. And the quality of the posts and content will suffer as we wouldn't have as many authentic & relatable posts/discussions that /r/povertyaus was created to foster.

A moderator of <u>r/transgenderau</u><sup>14</sup> further highlights the protection anonymity provides to users online:

[Anonymity] is a massively important part of our subreddit because a lot of folks are posting under names that they want to try out or are afraid of what others in their social circles might think such as friends, family and colleagues. The anonymity helps our community come out on their own terms and not beforehand. Doxxing, ie the posting of someone's name, can cause harm to someone, particularly as we come under attack by the media and some politicians. We are a vulnerable community and we do see the harm that this hateful rhetoric getting spouted unleashes on our community and our anonymity helps protect a lot of us from that pain.

Being able to be anonymous on Reddit provides a space for users to be vulnerable, while maintaining their safety and privacy, and for these conversations to flourish. Reddit has previously made submissions to the <u>public consultation processes of the Anti-Trolling Bill</u><sup>15</sup> and the <u>proposed changes to Australia's uniform defamation laws</u>, <sup>16</sup> both of which explain the importance of anonymity to users online. As set out in our submission to the Anti-Trolling Bill, Australian moderators were very concerned about the *Voller* decision and the potential legal risk arising from the decision, with some Australian users resigning as moderators or closing their communities entirely.

However, rather than clarifying the position of ordinary internet users who administered pages on social media websites, the Anti-Trolling Bill failed to protect the interests of ordinary internet users and further promoted the conception of anonymity as inherently unsafe. While we supported a legislative correction to *Voller*, we were, and still remain, concerned about the Anti-Trolling Bill and any laws that strip users of their right to anonymity and privacy. It is crucial that any laws and regulations, whether new or amending existing legislation, must protect the experiences of internet users. Preserving anonymity and privacy of users is critical to ensuring the continued value of online discussions and communities and the safety of users.

# B. Tech Regulation Should Not Be One-Size-Fits-All

We appreciate the Senate Committee's efforts to examine the current state of the tech industry and consider how regulation can be best formulated to address issues facing consumers. However, there is a real risk that smaller platforms, with differentiated or unique business models, and their users, are

 $https://consultations.ag.gov.au/legal-system/social-media-anti-trolling-bill/consultation/view\_respondent?uuId=995289004$ 

https://www.justice.nsw.gov.au/justicepolicy/Documents/review-model-defamation-provisions/stage-2/part-a/reddit-submission.PDF

<sup>13</sup> http://www.reddit.com/r/povertyaus

<sup>14</sup> http://www.reddit.com/r/transgenderau

forgotten in attempts to address issues caused by larger platforms. Indeed, it would be detrimental to platforms with creative community-focused governance models if laws or regulations aimed at addressing issues arising from centralised, single tier content moderation models are applied to all platforms, regardless of the platform's existing structures and its users.

As discussed above, Reddit's user-first approach to governance differs from the type of algorithmic sorting practices adopted by some other digital platforms and currently being examined in the Inquiry and by regulators in other jurisdictions. Rather than adopting a top-down approach to governance, we empower users to make the decisions that best fit their communities. For instance, the moderators of <a href="https://rtansgenderau">r/transgenderau</a><sup>17</sup> explain why Reddit's user-first content moderation model suits their needs:

We are a small and often misunderstood community and what is a transphobic dog whistle often gets missed by big moderation groups like that of Facebook. We need to be able to moderate ourselves to ensure that action is taken swiftly and appropriately. We need to ensure that our community is safe and we do get attacked from time to time, even in Australia.

A one-size-fits-all approach to tech regulation, where smaller platforms with unique offerings are considered the same as larger digital platforms with vastly disparate operations and values, could have serious consequences for users and their communities. We would therefore encourage the Senate Committee to carefully consider the spectrum of digital platforms that exist in the tech sector, and how any proposed law and regulation may affect smaller, emerging platforms and inevitably, users.

#### IV. Conclusion

We thank you for considering our submission and providing us with the opportunity to provide a differentiated perspective in the ongoing debate on tech regulation. In particular, we hope our explanation of Reddit's user-first and democratic approach to online governance, the value of anonymity to online safety and privacy, and the dangers of applying a one-size-fits-all approach to tech regulation assists in your consideration of key issues in the Inquiry. Please feel free to contact us if you have any questions about our submission or would like to discuss.

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<sup>&</sup>lt;sup>17</sup> http://www.reddit.com/r/transgenderau