

Your response

Question	Your response
<p>Question 1: How do you measure the number of users on your service?</p>	<p>Confidential? – N</p> <p>Trustpilot is an online consumer reviews platform that brings businesses and consumers together to foster trust and inspire collaboration. Our vision is to be a universal symbol of trust. We are free to use, open to everybody and built on transparency.</p> <p>Trustpilot hosts user-generated content in the form of reviews. These reviews help consumers shop with confidence, and deliver rich insights to help businesses improve the experiences they offer. The more consumers that use our platform and share their own opinions, the richer the insights we offer businesses, and the more opportunities they have to earn the trust of consumers from all around the world. In previous submissions we have provided detailed insights about our business model and processes.</p> <p>We welcome the UK Government’s aim to create safer online experiences and to protect children online. As an extension of this, we also welcome the opportunity to respond to this consultation.</p> <p>Trustpilot has both consumer and business facing services. Our consumer facing services consist of our consumer site and mobile app, alongside this we also have a business website (“B2B site”) and business-to-business-app.</p> <p>As a listed company, and as part of our regular reporting cycle, we report global “monthly unique users” as well as the “cumulative number of reviews” submitted to Trustpilot. “Monthly unique users” are users who have loaded at least one page on the Trustpilot consumer website (www.trustpilot.com) in any given month and excludes users of our business site (www.business.trustpilot.com). This is based on our essential cookie tracking and does not require users to be logged in to an account. Whilst our “cumulative number of reviews” encompasses all reviews submitted to Trustpilot’s platform since its inception (including</p>

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	reviews subsequently removed by our fake review detection systems, or deleted by reviewers themselves).
<p>Question 2: If your service comprises a part on which user-generated content is present and a part on which such content is not present, are you able to distinguish between users of these different parts of the service? If so, how do you make that distinction (including over a given period of time)?</p>	<p>Confidential? – N</p> <p>As conveyed in previous submissions, the user-generated content which Trustpilot hosts takes the form of reviews written by consumers, and this <i>only</i> appears on our consumer site. To read reviews left on Trustpilot, visitors to our site don't need an account. However, to submit a review, a user must create a profile and username and this must be attached to a valid, permanent email address. Once they have been passed through our automated fraud-detection software, these reviews are then hosted on the profile page of the company to which the review pertains.</p> <p>We would also note that there are also parts of our consumer site which do not host any user generated content, such as the consumer blog, category pages, Help Center and legal pages. In counting users, we do not distinguish between which part of the site they are accessing.</p> <p>In contrast, the B2B site does not have the same functionality to create user-generated content as its purpose is different - the B2B site is focused on helping businesses to maximise the benefits and value of Trustpilot.</p> <p>Given these are two separate sites, with different audiences, we are able to count overall users of the consumer site and users of the business site, but there may be some duplication if people switch between the two sites.</p>
<p>Question 3: Do you measure different segments of users on your service?</p> <ul style="list-style-type: none"> ● Do you segment user measurement by different parts of your service? For example, by website vs app, by product, business unit. 	<p>Confidential? – Y</p> <p>As relayed in responses to the previous questions, Trustpilot offers:</p> <ul style="list-style-type: none"> ● A consumer site (accessible via desktop and mobile web) ● A business app (accessible via desktop and mobile web)

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	<p data-bbox="683 309 1070 338"><u>Segmentation of business users</u></p> <p data-bbox="683 349 1358 647"> [REDACTED] [REDACTED] If a consumer has written a review about a business on Trustpilot, a business profile page is created for that business. Businesses are then able to claim their business profile page and access our Free Plan features or upgrade to any of our other plans. Once a profile has been claimed, it will display the status label "Claimed". [REDACTED] [REDACTED] </p> <p data-bbox="683 770 1342 1070"> [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] </p> <p data-bbox="683 1115 1366 1458"> [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] </p> <p data-bbox="683 1503 1358 1877"> When considering future requirements upon businesses to segment their audiences, we would stress the importance of proportionality. It is vital to recognise that the Online Safety Bill will apply to a wide range of firms and they will have very different audiences, capabilities and resources. We would therefore encourage Ofcom to avoid a one-size-fits-all approach and ensure that any requirements it considers in this space are proportionate to the risk level, functionality and size of businesses in scope. </p>

² A business' top level categories are determined for businesses by Trustpilot using an in-house Data Science model, which is based upon the choice of category chosen by a business at sign-up with us.

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<p>Question 4: Do you publish any information about the number of users on your service?</p>	<p>Confidential? – N</p> <p>We currently publish information about the number of users of our service through three different routes.</p> <p>The first is through our investor relations and reporting responsibilities. As part of this we publish the number of global active monthly unique users (defined in response to question 1) for Trustpilot through a number of documents including our Annual Report and Full Year results.</p> <p>In addition to this, as a company which operates in the European Union, we are subject to the Digital Services Act (DSA). Under the DSA we are required to report our “monthly active recipients” as defined under the DSA.</p> <p>For this, we report data based on any EU user that has loaded a page on Trustpilot in a given month and provide a six month average of the monthly active recipients on each of our platforms. Where possible we deduplicate consumers across the platforms. This data includes the consumer site, business site, B2B app and mobile app.</p> <p>Whilst we appreciate the motivations behind this requirement in the DSA, we would argue that equating “active” recipients to views of pages is quite a crude metric. This is on the basis that this metric does not actually take account of whether a user has indeed been “active” in their engagement with the content or has simply landed on the site for a split second before moving elsewhere, making them an “inactive” recipient when it comes to engagement with content.</p> <p>In the context of Trustpilot, an ‘active’ or ‘engaged’ consumer could be better considered as a consumer that, in a given month, has at least either:</p> <ul style="list-style-type: none"> ● 2 Company Profile Page Loads, or ● 2 Page Clicks, or ● 1 Submitted Active Review, or ● 1 Successful Authentication or ● 1 Submitted/Clicked Search, or ● 1 Invitation/Evaluate Link Click

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	<p>However, we would note that such metrics would be quite bespoke to different business models. An active user on Trustpilot would be very different to an active user on a social media platform, for example. But it is important that consideration is given to this, to ensure metrics are meaningful.</p> <p>Finally, we have also published information about the number of users on our service in our 2022 Transparency Report, which looks back on the data in the previous year. As part of our commitment to be a universal symbol of trust, Trustpilot publishes an annual Transparency Report on our website which is downloadable by everyone. Within this report, we provide a range of insights, detailing the actions we are taking to protect and promote trust online.</p> <p>In our 2022 Transparency Report we published information about the global number of consumers writing their first review on Trustpilot and about the numbers of submitted reviews - including by country - which can give some indication of active users, however this does have limitations.</p>
<p>Question 5: Do you contribute any user number data to external sources/databases, or help industry measurements systems by tagging or sharing user measurement data? If not, what prevents you from doing so?</p>	<p>Confidential? – N</p> <p>In order to be transparent and build trust with both consumers and business, we voluntarily publish our annual Transparency Report. This provides a range of data and insight about the inner workings of Trustpilot, the steps we take to safeguard the platform, as well as important information with regard to new innovations that we have adopted.</p> <p>From 2023, we have also contributed data on our number of “active recipients” to the European Commission under the Digital Services Act. This bespoke data is reported every six months, as required by the Act.</p> <p>Beyond this, we do not provide data to external sources, databases or industry measurement systems. This is due to multiple reasons, including that we have not been invited to contribute data to such systems and,</p>

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	<p>additionally, as a listed company there are restrictions on what data we can share publicly.</p> <p>With respect to mandatory requirements to provide bespoke data to regulators, we would note that this places significant capacity constraints on our Data Team. To service data requests, internal resources must be secured to pull the data, refine it, analyse it and then to present and report it in the mandated format.</p> <p>Whilst we appreciate that regulators may seek certain data from companies, it is important to appreciate that for companies such as ours this can result in a trade off - with resources being taken away from other work which supports our ability to innovate and grow as a business. We would therefore urge a proportionate approach to be taken for data requests from companies.</p> <p>Further to this, we would also note that - as Ofcom recognises - there is a vast array of firms in the scope of the Online Safety Bill. With this range comes significant diversity in how the services work and what is considered a 'user'. It is therefore important to recognise that this can lead to implications and limitations for meaningfully comparing the data and user numbers between different service types.</p>
<p>Question 6: Do you have evidence of functionalities that may affect how easily, quickly and widely content is disseminated on U2U services?</p> <ul style="list-style-type: none"> ● Are there particular functionalities that enable content to be disseminated easily on U2U services? ● Are there particular functionalities that enable content to be disseminated quickly on U2U services? ● Are there particular functionalities that enable content to be disseminated widely on U2U services? 	<p>Confidential? – Y</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Posting a review is relatively straightforward on Trustpilot,</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

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<ul style="list-style-type: none"> Are there particular functionalities that prevent content from being easily, quickly and widely disseminated on U2U services? 	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p><u>Platform dissemination of content</u></p> <p>Online platforms, such as social media services, can disseminate content via feeds that contain recommended or curated content. [REDACTED]</p> <p>[REDACTED]</p> <p>Consumers decide what content they want to view on the platform. They are not presented with a curated feed when they log in. A selection of reviews most recently written on Trustpilot is shown on our consumer landing page for all users [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] Once they have selected a business whose reviews they would like to read, users can view the page for that business to see all of the reviews published for that business.</p> <p><u>Consumer dissemination of content</u></p> <p>On many services, consumers can disseminate content by sharing it with other users. This might occur, for example, via:</p> <ul style="list-style-type: none"> direct messages or chats forwarding or sharing of content with other users allowing user comments on content left by other users links within content that allow for cross-referencing promoting certain posts or tagging of content so it becomes searchable across a platform

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	<p>manually share selected content, such as individual reviews, via external channels such as social media.</p> <p>Businesses can also interact with specific reviewers by leaving a reply to individual reviews, which is displayed underneath each review. They must comply with our guidelines and there is no functionality for these replies to be shared.</p> <p>Content and tips about how to use Trustpilot can be posted to help business users in our Business Community, which is a part of Trustpilot's Help Center. Content published in this space is pre-approved before it is posted to the Business Community pages to ensure it complies with the rules and takes the form of helpful information addressing technical problems or sharing practical tips about how to use Trustpilot.</p>
<p>Question 7: Do you have evidence relating to the relationship between user numbers, functionalities and how easily, quickly and widely content is disseminated on U2U services?</p>	<p>Confidential? – N</p> <p>With regard to the relationship between user numbers, functionalities and the dissemination of content, we can provide the following observations.</p> <p>In 2021, we reported that 167.5 million reviews had been submitted to Trustpilot, up from 120.7 million reviews at the end of 2020. Feedback provided by Trustpilot users to us highlights that it is important for the process of posting a review to be easy, and the ease of doing so on Trustpilot is one of the reasons that a growing number of people use our service. Putting in place extra requirements that create friction during the process of leaving a review or extend the time it takes to submit a review could mean that less people will post reviews.</p> <p>We draw a distinction between ease of posting and a high number of users, <i>versus</i> the potential for the wide dissemination of content. The relationship between these two elements is moderated by service functionalities. For example, while our service has the potential to provide access to up to 167.5 million reviews, it does not include functionalities that allow for the quick, easy and wide dissemination of specific pieces of content. The functionalities that Trustpilot offers via our service directly</p>

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	<p>support our purpose as an online reviews platform and our software-as-a-service-based (SaaS-based) business model. In line with our purpose, our platform is designed to deliver specific and relevant information to those seeking it.</p> <p>Trustpilot is a SaaS platform. We offer the ability for consumers and businesses to use our platform for free. Our revenue is based on software subscriptions from businesses who choose to subscribe to our additional software services - such as gaining access to analytics tools to monitor their performance and access real-time insights on customer feedback, and a range of options to showcase Trustpilot reviews in their marketing channels to convert browsing consumers into buyers. Our purpose is to help consumers discover information about specific businesses and sectors as and when they need it, and for businesses to learn and improve from their customers' experiences. It is important that users of our service are able to find relevant and useful information targeted to an individual domain or type of business. Therefore, even as our user numbers and the volume of information we host increases, our inherent purpose and the corresponding design and features of our platform will serve to moderate the dissemination of individual pieces of content.</p>
<p>Question 8: Do you have evidence of other objective and measurable factors or characteristics that may be relevant to category 1 threshold conditions?</p>	<p>Confidential? – N</p> <p>We welcome the aim of the Online Safety Bill to make the use of regulated internet services safer for UK individuals by addressing risks of harm such as illegal content and activity, and content or activities harmful to children. We note the intention for the duties imposed on services to be proportionate and targeted to the risks that services pose. To ensure that the Bill addresses the real-world harms that policymakers seek to target, it is important that the provisions define thresholds that are flexible and nuanced enough to be fit for this purpose.</p> <p>In that regard, we suggest that several related characteristics could be considered as core factors in determining category 1 threshold conditions because</p>

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	<p>they are relevant to the level of risk posed by the service. These include the <i>functionalities</i>, as well as the type of service and types of content hosted, and the purpose of the platform.</p> <p>The functionalities of a service are decisive in determining how content can be engaged with and how widely and quickly it can spread. They are also the tools that can be exploited by those interested in disseminating particular content.</p> <p>The type of service and the content it hosts, and the purpose of the service are also characteristics that are relevant to the level of risk. These elements likely go hand in hand with and reflect the types of functionalities offered. For example, it is logical that platforms designed to generate advertising revenue from content spreading quickly and widely will have a greater incentive to enhance functionalities that support the dissemination of such content at speed, and to attract, encourage and promote on-trend or popular topics, as well as attention-grabbing content. In contrast, platforms designed to serve relevant content to users who search for it by topic will have different functionalities and display a different type of content. Both types of platforms could have a large number of users, but the risks of harm will be very different. This underlines why a one-size-fits-all measure should be avoided in favour of a more differentiated approach that incorporates functionalities, considers platform type and purpose, and types of content hosted.</p> <p>The format of the user-generated content hosted likely has an impact on its dissemination and the level of risk of harm that it poses. For example, category 1 threshold conditions could consider that colourful images, videos and audio are more likely to draw clicks than written text. Content that is designed for the purpose of entertainment and must compete for attention on a busy feed by being more controversial, sensationalist or extreme could be more likely to be shared quickly and widely than content designed to be useful and credible (such as information contained in reviews).³</p>

³ We note that anecdotal evidence suggests that readers of reviews tend to attribute a lower level of credibility to reviews that contain extreme language or claims.

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	<p>We welcome the direction taken in the UK so far, which acknowledges that there are different types of models for different services, and therefore also different ways of considering appropriate threshold measures, including the calculation and relevance of user numbers. We also see benefits in an approach that limits the user count to those parts of a service that host user-generated content, since this is where the risk of harm is also likely to be. We encourage a continuation of this kind of thoughtful and nuanced approach to measurement, and advocate for a comprehensive, blended approach that considers a range of different factors together to determine appropriate thresholds that meaningfully reflect the level of risk.</p>
<p>Question 9: Do you have evidence of factors that may affect how content that is illegal or harmful to children is disseminated on U2U services?</p> <ul style="list-style-type: none"> ● Are there particular functionalities that play a key role in enabling content that is illegal or harmful to children to be disseminated on U2U services? ● Do you have evidence relating to the relationship between user numbers, functionalities and how content that is illegal or harmful to children is disseminated on U2U services? 	<p>Confidential? – N</p> <p>As stated in Trustpilot’s Terms of Use, our online review service is not aimed at children and they are not allowed to create accounts.</p> <p>See our answers above. We note that, generally, the functionalities, type and purpose of a service, as well as the types and format of content hosted are likely to be relevant to the dissemination of content that is illegal or harmful to both adults and children. However, not all of these characteristics are equal in how they may impact the spread of harmful content to children, and this should be recognised to inform a tailored approach to assessing their role. For example, the format of particular types of content such as colourful images, video and audio - and the level of interactivity it provides - are more likely to appeal to children and this is likely to have an impact on the extent to which it is disseminated.</p>
<p>Question 10: Do you have evidence of other objective and measurable characteristics that may be relevant to category 2B threshold conditions?</p>	<p>Confidential? – N</p> <p>With regards to the categorisation, we note that much of the discourse around the Bill has drawn out the dangers posed by particular types of platforms deemed to be high risk due to the types of content they host and the way in which they are used. Specifically, with regards to</p>

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	<p>categories of high-risk platforms, these include social media, pornography and gambling sites.</p> <p>As such, in order to ensure that the legislation meets public expectations and fulfils its stated goals, we suggest that the drafting of threshold conditions provides a unique opportunity to ensure that each of the categories is shaped in such a way as to accurately target services that pose the corresponding level of risk of potential harm.</p> <p>We believe it is important to avoid a one-size-fits-all approach to solutions, noting the diversity of the online world and the different types of services on offer. An assessment of thresholds should reflect platform risk by drawing on a multi-faceted set of criteria that includes the type of service and purpose, its functionalities, type and format of content hosted as key components. Reach and size may be useful as additional aspects for consideration, but as has been recognised, this is not necessarily reflective of risk. Smaller platforms can pose high levels of risk due to the type of harmful content they host and their functionalities for disseminating it, and large platforms such as social media that are designed for the purpose of entertainment have dominated the discourse in relation to concerns regarding children because of functionalities such as recommended content feeds and sharing options.</p> <p>Functionalities underscore the type and purpose of the platform and its business model. A holistic consideration of a range of factors - with functionalities placed at the centre - will help to distinguish between high-risk and lower-risk platforms and services.</p>
<p>Question 11: Do you have evidence of matters that affect the prevalence of content that (once the Bill takes effect) will count as search content that is illegal or harmful to children on particular search services or types of search service? For example, prevalence could refer to the</p>	<p>Confidential? – N</p> <p>No response.</p>

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<p>proportion of content surfaced against each search term 16 that is illegal or harmful to children, but we welcome suggestions on additional definitions.</p> <ul style="list-style-type: none"> Do you have evidence relating to the measurement of the prevalence of content that is illegal or harmful to children on search services? 	
<p>Question 12: Do you have evidence relating to the number of users on search services and the level of risk of harm to individuals from search content that is illegal or harmful to children?</p> <ul style="list-style-type: none"> Do you have evidence regarding the relationship between user numbers on search services and the prevalence of search content that is illegal or harmful to children? 	<p>Confidential? – N</p> <p>N/A</p>
<p>Question 13: Do you have evidence of other objective and measurable characteristics that may be relevant to category 2A threshold conditions?</p>	<p>Confidential? – N</p> <p>N/A</p>

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