Call for evidence response form

Please complete this form in full and return to os-cfe@ofcom.org.uk

Contact phone number

Representing (select as appropriate)
Organisation

Organisation name
Patreon

Email address
✂

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see Ofcom's General Privacy Statement.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? (select as appropriate)
Your Name

Your response: Please indicate how much of your response you want to keep confidential (select as appropriate)
None

For confidential responses, can Ofcom publish a reference to the contents of your response? (select as appropriate)
Yes

Your response

Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.
Is this a confidential response? (select as appropriate) *[Please select]*
Patreon is grateful for the opportunity to submit evidence for the Second Phase Of Online Safety Regulation. Patreon is a membership platform that empowers creators and artists to earn sustainable income. The platform, which was started in 2013 by musician and video creator Jack Conte and his college roommate Sam Yam, has become a top income-generating solution for over 200,000 creators. Since Patreon's inception, the company has processed more than £250 million pounds ($300+ million U.S. dollars) in payments to creators in the UK. Patreon prevents minors under age 13 from using the platform, and in this evidentiary submission, we will focus on our approach to prioritizing their safety and continuing to serve creators.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?
Is this a confidential response? (select as appropriate) *[Please select]*
Our Community Guidelines limit all users, creators and patrons, to those over the age of 13. In addition, creators who are minors are limited in the types of accounts they can create. Because Patreon's core function as a platform is to generate income for creators by connecting them with their biggest fans, or "patrons." The payment required to sign up as a "patron" creates a higher barrier of entry to accessing content than most platforms. Because of this structure, our user base tends to skew older and we do not actively seek to attract child users.

Question 3: What information do services have about the age of users on different platforms (including children)?

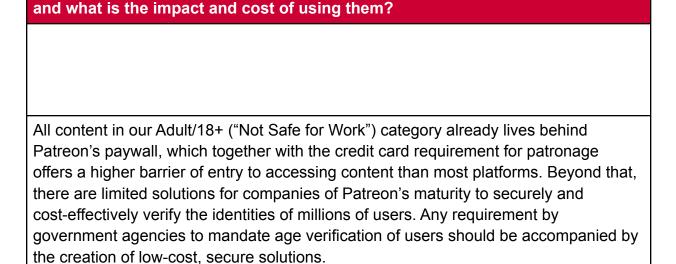*Is this a confidential response? (select as appropriate)*

[Please select]

Users under age 13 are not permitted on Patreon. Users between the ages of 13 and 17 may have creator or fan ("patron") accounts on Patreon with the permission of a parent or guardian. But more broadly, the vast majority of Patreon users are adults, largely because participation on Patreon requires credit card payment. Additionally, to ensure that all creators of content in our Adult/18+ ("Not Safe for Work") category are verified to be over the age of 18, we are currently rolling out age verification measures which we detail further in subsequent questions. The age verification process is carried out in accordance with the requirements of Mastercard and our payments partners, who provide payments infrastructure and facilitate payments to Patreon creators. Along with ID verification, we have a 12+ App Store rating which allows parents to enable device-level restrictions on their child's iPhone. Also, all patrons seeking to subscribe to Adult/18+ campaigns are prompted to confirm they are over the age of 18.

Question 4: How can services ensure that children cannot access a service, or a part of it?

Is this a confidential response? (select as appropriate)

[Please select]

Users between the ages of 13 and 17 may have creator or fan ("patron") accounts on Patreon with the permission of a parent or guardian. Additionally, we have implemented features to ensure that underage patrons do not access Adult/18+ ("Not Safe for Work") content. All patrons seeking to pledge to Adult/18+ campaigns are prompted to confirm they are over the age of 18. Additionally, having secured the 12+ Apple App Store rating, Patreon empowered parents to enable device-level restrictions on their child's iPhone.

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

All content in our Adult/18+ ("Not Safe for Work") category already lives behind Patreon's paywall, which together with the credit card requirement for patronage offers a higher barrier of entry to accessing content than most platforms. Beyond that, there are limited solutions for companies of Patreon's maturity to securely and cost-effectively verify the identities of millions of users. Any requirement by government agencies to mandate age verification of users should be accompanied by the creation of low-cost, secure solutions.

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Patreon consistently assesses and mitigates high-priority types of content that impacts minors. Patreon's Community Guidelines address the topic of Minor Safety among other types of content that impact teens, from pornography, self-harm, and dangerous organizations to harassment and bullying, and the promotion of drugs and paraphernalia. Patreon has zero tolerance for content that violates our policies. We remove content that violates these policies and may remove accounts based on these violations. All patrons seeking to subscribe to Adult/18+ ("Not Safe for Work") campaigns on Patreon are prompted to confirm they are over the age of 18. Patreon also has a 12+ App Store rating which allows parents to enable device-level restrictions on their child's iPhone.

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Is this a confidential response? (select as appropriate)

[Please select]

We partner with world-class organizations that specialize in this space of protecting children online, such as [THORN](#) and [The National Center for Missing and Exploited Children (NCMEC)](#), whose research-driven expertise we utilize to ensure we mitigate risks and keep Patreon a safe place for children 13 and up.

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Is this a confidential response? (select as appropriate)

[Please select]

We are committed to making the Internet as safe as possible for children. We operate on a global scale and take potential risk towards minors very seriously everywhere in the world, the UK included. To that end, we work with law enforcement globally and partner with world-class organizations promoting online safety and evaluating related harm risks including [THORN](#) and [The National Center for Missing and Exploited Children (NCMEC)](#).

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Is this a confidential response? (select as appropriate)

[Please select]

Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?
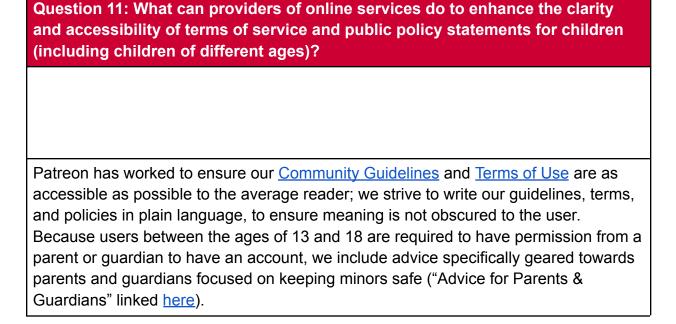
Is this a confidential response? (select as appropriate)

[Please select]

Patreon takes child user and platform safety incredibly seriously and has a zero tolerance policy for child exploitation. Our CEO Jack Conte has expressed how important Minor Safety is to the company: "Having the highest bar on Minor Safety is non-negotiable. We won't stand for anything that jeopardizes kids," (October 12, 2022). To that end, the following is an overview of the sorts of structures and methods in place to uphold our commitment to protecting children on Patreon:

If a user wants to create a Patreon account, they need to be at least 13. If they want to join a creator's membership as a patron or provide membership as a creator, they must have permission from a parent or guardian if they are not yet 18 years or older. Patreon built a dedicated Minor Safety group within the Trust & Safety team who specifically focus on Minor Safety. We are continuing to hire to support this vertical. Patreon also has a 12+ Apple App Store rating which allows parents to enable device-level restrictions on their child's iPhone. Additionally, Patreon invests in valuable partnerships with THORN to inform our Minor Safety efforts and assist with the detection of any Child Sex Abuse Material ("CSAM"), which our moderators can swiftly report to The National Center for Missing and Exploited Children (NCMEC). Patreon has also joined The Tech Coalition, an alliance of global tech companies who work together to combat child sexual exploitation and abuse online. Furthermore, Patreon has contracted investigators to help screen creator activity pertinent to Minor Safety both on and off the platform.

On top of the robust measures that Patreon takes regarding Minor Safety, the company makes sure our users are aware of these efforts, such as detailing age requirements in our Terms of Use, discussing Minor Safety in the platform's Community Guidelines, and highlighting features like blocking tools, user reporting, and advice for parents and guardians of teen creators on the blog: Keeping Young Creators Safe on Patreon and How Do I Handle a Problematic Patron?

Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?

Patreon has worked to ensure our [Community Guidelines](#) and [Terms of Use](#) are as accessible as possible to the average reader; we strive to write our guidelines, terms, and policies in plain language, to ensure meaning is not obscured to the user. Because users between the ages of 13 and 18 are required to have permission from a parent or guardian to have an account, we include advice specifically geared towards parents and guardians focused on keeping minors safe ("Advice for Parents & Guardians" linked [here](#)).

We consistently assess and mitigate risk on the platform related to high-priority types of content that impacts minors. In addition to Minor Safety concerns, Patreon considers pornography, the promotion of self-harm, harassment and bullying, dangerous organizations, and the promotion of drugs and paraphernalia as areas of content which impact minors on the platform. Patreon has zero tolerance for content that violates our policies. We remove content that violates these policies and may remove accounts based on these violations.

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

Is this a confidential response? (select as appropriate)

[Please select]

Patreon educates and interacts with our user base regularly via blog posts and the [Creator Policy Engagement Program](#) to keep them up to date on useful features and upcoming policy updates. For users who are under age 18, this particularly includes features like blocking tools, user reporting, and parent/guardian advice to keep minor creators safe on Patreon such as the following blog post: "[How Do I Handle a Problematic Patron?](#)"

Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?

Is this a confidential response? (select as appropriate)

[Please select]

We encourage our users to report creators or content that may be in violation of our guidelines. We review every single user report.

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

Is this a confidential response? (select as appropriate)

[Please select]

Core to Patreon's mission is preserving the relationship between a creator and their fans ("patrons"). To protect this relationship, humans manually review user reports for our high risk areas. This ensures we enforce our policies with high craft for the benefit of the user. Any instances of policy violations that are potentially harmful to children are and will be removed and in some cases may result in the removal of a full account.

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

Is this a confidential response? (select as appropriate)

[Please select]

To ensure that all creators of content in our Adult/18+ ("Not Safe for Work") category are verified to be over the age of 18, we are currently rolling out age verification measures which we detail further in subsequent questions. The age verification process is carried out in accordance with the requirements of Mastercard and our payments partners, who provide payments infrastructure and facilitate payments to Patreon creators. Also, all patrons seeking to subscribe to Adult/18+ campaigns are prompted to confirm they are over the age of 18.

For "patrons," or fans, who support Patreon creators and are under 18, Patreon has features in place to ensure that underage patrons do not access NSFW content. All patrons seeking to pledge to Adult/18+ campaigns are prompted and must confirm they are over the age of 18 in order to access the content. Additionally, Patreon has tooling to detect when a creator who was removed from the platform tries to return. Patreon also supports creators under the age of 18 in responding to uncomfortable or inappropriate behavior on the part of patrons, or fans. For example, they can flag any harassment to the Trust & Safety team by filing a report that the team will expeditiously investigate. The company also has tooling that creators can use to block any patrons whose interactions are disruptive or unwanted. In cases of grooming or solicitation, we work closely with the National Center for Missing and Exploited Children (NCMEC) and report harmful and illegal behavior where appropriate, as well as partners like THORN to improve our detection of activities that are harmful to minors. Patreon also has a 12+ App Store rating which allows parents to enable device-level restrictions on their child's iPhone.

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?

Is this a confidential response? (select as appropriate)
[Please select]
Patreon is constantly evaluating how we can improve safety on the platform.

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

Is this a confidential response? (select as appropriate)
[Please select]
Patreon partners with world-class organizations that specialize in this space of protecting children online, such as THORN and The National Center for Missing and Exploited Children (NCMEC), whose research-driven expertise we utilize to ensure we mitigate risks and keep Patreon a safe place for children 13 and up. Patreon has also joined The Tech Coalition, an alliance of global tech companies who work together to combat child sexual exploitation and abuse online.

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?

Is this a confidential response? (select as appropriate)
[Please select]

Patreon does not recommend or push any content to users; patrons only see content that they are subscribed to. In addition, Patreon limits search functionality for adult content to limit the discoverability of such content.

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?

Is this a confidential response? (select as appropriate)

[Please select]

Patreon is constantly evaluating how we can improve safety on the platform. The Minor Safety team has a robust strategy to deepen our protection for children on the platform, including improving detection of any Child Sex Abuse Material ("CSAM"), CSAM, streamlining the process for moderators to report content to The National Center for Missing and Exploited Children (NCMEC), and implementing grooming detection on the platform to protect children from any predatory activity. We are always looking to improve our processes, methods, and automation to keep the platform safe, especially for minors.

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

Currently used:
- Thorn partnership, to guide our Minor Safety efforts and adopt technology tools to make our detection more robust
- Thorn's Safer product for automated CSAM detection
- NCMEC partnership and CSAM reporting process
- Patreon has joined The Tech Coalition, an alliance of global tech companies who work together to combat child sexual exploitation and abuse online

In development:
- Improving detection of unknown CSAM
- Streamlining NCMEC reporting to be quicker and more efficient
- Implementing grooming detection on platform to protect children from predatory activity

Question 22: How are human moderators used to identify and assess content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

Because Patreon takes enforcement accuracy extremely seriously, the company places a special emphasis on human review of content. We have a third party vendor screening for high risk content that violates Patreon's Community Guidelines, and content that the vendor flags is then reviewed by human moderators at Patreon and actioned upon appropriately. Human moderators also review all user reports we receive and take appropriate action. Finally, Patreon enlists contracted investigators to help screen activity of creators on and off-platform, specifically as it relates to Minor Safety. Any leads generated are also reviewed and actioned on by internal moderators.

Question 23: What training and support is or should be provided to moderators?

Is this a confidential response? (select as appropriate)

[Please select]

Patreon provides vertical-specific moderator training for each of our policy vertical areas (e.g. Minor Safety, Sexually Graphic Content, Hate Speech). Moderators are provided with an annual Learning & Development stipend which they can use to grow their expertise. Moderators are also afforded access to individual and group wellness sessions to help build resilience and assist with processing difficult and disturbing

content. Additionally, Patreon is actively adding wellness features to our moderation tools, such as grayscale and blurring.

Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?

Is this a confidential response? (select as appropriate)

[Please select]

We utilize multiple layers of both in-house and outsourced detection to identify content that may be exploitative or harmful to children. We use automated detection tools to surface violative content quickly and efficiently. We employ outsourced human moderation to further increase detection of more nuanced potentially exploitative or harmful content. Finally, our internal human moderators review detected content to take appropriate action.

Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?

Is this a confidential response? (select as appropriate)

[Please select]

Patreon has zero tolerance for content or behaviors that exploit minors such as Child Sex Abuse Material ("CSAM"), grooming, or solicitation, or content that glorifies sexual violence including sexualized depictions of minors. Users actively facilitating exploitation or attempting to exploit minors in these ways will be removed from Patreon and we will report users engaging in such activity to appropriate authorities upon removal. Similarly, Patreon removes content related to the Scale for Suicide Ideation ("SSI"), bullying and harassment, which can affect minors on the platform as well.

Question 26: What other mitigations do services currently have to protect children from harmful content?

Is this a confidential response? (select as appropriate)

[Please select]

Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?

Is this a confidential response? (select as appropriate)

[Please select]

Human moderators review user reports and use of blocking tools (e.g. a patron blocked by a creator for being "underage") within Patreon to identify underage users attempting to circumvent application protections to keep them from accessing "Adult/18+" (Not Safe for Work) content. The age verification process for creators in the Adult/18+ category is carried out in accordance with the requirements of Mastercard and our payments partners, who provide payments infrastructure and facilitate payments to Patreon creators.

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

Is this a confidential response? (select as appropriate)

[Please select]

Patreon is constantly evaluating the potential for new solutions to solve this problem and the ones we have used and discussed in this document are so far the ones we have found to be most effective.

---

[1] See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.