

About Gumtree UK

Gumtree is one of the UK's largest classifieds websites and apps, hosting approximately 1.9 million classifieds listings live on the platform at any given time. The vast majority of trade on the platform is between private individuals selling second-hand goods and services, enabling local communities to effortlessly participate in the circular economy.

At Gumtree, we are committed to safeguarding our community against online harms, and we believe user confidence in our platform is key to promoting a circular economy where people are empowered to shop second-hand. We are constantly reviewing and investing in our online safety framework and take a holistic, three-pillar approach to protect our users: 1) promoting positive behaviour, 2) deterring bad actors and 3) striving to be best in class.

We have strong moderation processes in place to take down ads that breach our community guidelines, and our dedicated safety team works hard to keep our community safe when an issue is reported, such as by blocking offending users and supporting law enforcement agencies with their investigations.

We also prioritise educating our users on how to stay safe online through our Safety Hub which offers information on how to follow best practice when trading on our platform. Further information on our approach to protecting our users can be found in our dedicated [Trust and Safety Report](#).

In addition to implementing rigorous trust and safety measures, we are committed to working together with policymakers, public bodies, and the wider e-commerce industry to help address industry-wide challenges and help make sure that the UK is the safest place in the world to go online.

In this spirit, we are pleased to have this opportunity to respond to this consultation on transparency reporting as part of our commitment to working with Ofcom to ensure the successful implementation of the Online Safety Act. This response has been separated by the three key themes outlined in Ofcom's draft transparency guidance:

1. Proposed approach to the transparency reporting regime
2. Delivery of transparency reports
3. Ensuring transparency reports are useful and accessible

1. Proposed approach to the transparency reporting regime

Gumtree agrees with Ofcom's overall approach and rationale for the transparency reporting regime. We agree that transparency reporting can encourage and incentivise services to improve their safety practices to secure better outcomes for users. This includes promoting examples of best practice to help services share insights and learn how and where further safety improvements can be made. In addition, Gumtree recognises the role that transparency reports can play in acting as a valuable source of information for the public on the safety performance of services to help users make informed decisions about which services they use.

Gumtree also agreed with Ofcom's proposed key principles and factors for determining what information categorised services will be required to publish within their transparency reports. The recognition that requested information is both relevant and appropriate for the circumstances of each service is welcomed by Gumtree. Delivering against these key principles will ensure that

transparency reports are effective while being sensitive to relevant data protection laws and other regulatory obligations.

As established in paragraph 37 of Schedule 8 of the Online Safety Act, Ofcom will be required to take into account the following factors when determining the information required by services for the transparency reports:

- a. The kind of service
- b. The functionalities of the service
- c. The number of users of the service
- d. The capacity of the provider
- e. The relevant duties of the provider
- f. The proportion of users of the service who are children.

Gumtree welcomes Ofcom's intention to consider the kind and types of risks each service faces when determining required information against factors a. (the kind of service) and b. (the functionalities of the service), including referring to the findings of each service's risk assessment. This will ensure that the required information is appropriate to each service and help to ensure that services are reporting on the steps they are taking to protect users against those particularly relevant risks for their service.

When considering the number of users of the service (c), Gumtree is encouraged by Ofcom's proposals of ensuring that requests made about safety systems and processes are relevant to the size of each service's user base. For example, as a larger platform with around 12 million users in the UK per month, Gumtree employs a range of automated measures to detect and mitigate against risk. We welcome Ofcom's recognition of the distinctive approach larger services take to prevent risk and its intention to reflect this in transparency reporting requirements.

In regards to the capacity of the provider (d), Gumtree welcomes Ofcom's intention to proactively engage with categorised services, allowing providers to make representations on the likely time, costs and effort needed to meet the proposed requirements of their transparency reports. For example, while Gumtree attracts a large number of users to our platform, we hold comparatively fewer resources and capacity than other larger services operating in the online marketplace industry. We are therefore encouraged by Ofcom's recognition that the content and delivery time for creating transparency reports will be reached via engagement with services.

In addition to these factors, For instance, our 2022 transparency report identified buyer scams as an area of concern which then allowed us to take action and tackle it head-on by reforming our user-to-user messaging system and introducing a report reply function for web users. In our 2023 transparency report, we revealed how the action we took in response to this threat allowed us to block 28% more accounts. With fewer bad actors able to access our platform, our ad removal rate for this type of harm also dropped by 30% year-on-year.

and how required information can reveal patterns of trends from transparency reports over time.

Gumtree has already voluntarily published three transparency reports for [2021](#), [2022](#), and [2023](#), each tracking a range of safety metrics which reflect the relevant risk profiles of our platform. This includes listings removed for suspected fraud, spam, prohibited and counterfeit items.

These metrics have also been consistently tracked over time to monitor the efficacy of our trust and safety measures while identifying those areas which required additional intervention. As a

result of this tracking, Gumtree regularly updates our trust and safety measures to respond to the evolving threat posed by bad actors.

For instance, our 2022 transparency report identified buyer scams as an area of concern which then allowed us to take action and tackle it head-on by reforming our user-to-user messaging system and introducing a report reply function for web users. In our 2023 transparency report, we revealed how the action we took in response to this threat allowed us to block 28% more accounts. With fewer bad actors able to access our platform, our ad removal rate for this type of harm also dropped by 30% year-on-year.

Informed by these reports and the actions we have taken, our most recent transparency report for 2023 found that the percentage of users potentially exposed to bad activity was below 1%, while the percentage of listings reported by users for fraudulent or harmful activity fell to just 0.02%. We are committed to continuing to publish annual transparency reports to track these key metrics, highlight the evolving risks posed by bad actors, and the measures we are taking to protect our users.

We have also shared these reports with key political and industry stakeholders to inform conversations about how we can continuously improve the trust and safety of our users and ensure we can be a force for good on the internet.

2. Delivery of transparency reports

Gumtree welcomes Ofcom's commitment to engaging with providers during each transparency reporting cycle to help support providers' understanding of the transparency reporting regime and to inform decisions about information requirements.

This engagement should be comprehensive and respond to the individual needs and requirements of each service. We are pleased that Ofcom has recognised that flexibility will be provided to meet this objective, including being responsive to those newly categorised services to ensure such providers receive the necessary understanding and knowledge of their transparency reporting requirements.

Gumtree also welcomes Ofcom's intention to first provide a draft transparency notice to those services required to produce transparency reports. This will ensure that relevant services have an opportunity to engage with Ofcom and provide formal representations and feedback on the content of the draft notice before the notice is formally issued. We encourage Ofcom to issue draft notices in a reasonable time before the deadline for the final notice. This will help to ensure that providers have sufficient time to consider and reflect on the draft notice and provide services opportunity to make formal representations on areas of potential concern, including issues involving confidentiality and commercial sensitivity. This approach will be crucial to ensuring that the principles and approach for delivering transparency reports are fully met.

In determining the content of the draft and formal notices, Gumtree supports Ofcom's desire to ensure that these are created with the intention of collecting insights and data which will enable comparability across the industry. While the information that services will be required to include in their transparency reporting should be tailored to each categorised service, ensuring that metrics are consistent over time is equally important. This will not only create the opportunity for

standardisation and consistency across the industry but will also allow for the reporting to be of the greatest value by tracking changes on shared risk areas.

For example, by consistently tracking the same indices through our yearly transparency reporting for the past three years, Gumtree has been able to track safety trends on the platform and demonstrate year-on-year challenges, changes and improvements. These, or similar, indices should be tracked across similar services to monitor the wider performance while ensuring examples of best practice are readily available.

3. Ensuring transparency reports are useful and accessible

As noted above, Gumtree welcomes Ofcom's ambition to measure digital safety across the industry and create measurable and reportable safety performance indices. Ensuring that these measurements are accessible and easily shared will help to continually improve online safety in the face of an ever-evolving landscape of risks.

At Gumtree, we are committed to ensuring the highest standard of safety for our users, and we are keen to learn what measures have helped other similar platforms improve user protections on their services. As such, we look forward to taking any relevant learnings from Ofcom's analysis and insights from other transparency reports to support our efforts to continually improve and enhance safety on our platform.

We already work with external partners and organisations to address industry-wide challenges, and we are keen to use our partners' expertise in specific areas to make our site better and safer. For example, Gumtree has close working relationships with category specialist experts, including Action Fraud, Citizens Advice, Department for Environment, Food and Rural Affairs, Environment Agency, Get Safe Online, Home Office, Pets Advertising Advisory Group, Residential Landlords Association, Vehicle Safe Trading Advisory Group and more.

We are equally keen to provide insights into the safety measures that have been successful on our platform to deter bad actors and promote positive behaviour – such as having both human and automatic moderation in place, a dedicated 24/7 safety team, or a digital fingerprinting system in place.

Gumtree is committed to working closely with Ofcom to maximise the effectiveness of the new transparency reporting regime while sharing and taking learnings from our wider industry to help continually protect and improve user safety.

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