

Response to eSafety Letter dated 4 September 2025 (SMMA)

**12 September 2025**

Dear eSafety Commissioner,

We refer to your letter dated 4 September 2025 providing an update on eSafety's progress on the development of regulatory guidance and Kick's assessment of why Kick is an age-restricted social media platform.

**Social Media Minimum Age Obligations (SMMA)**

We thank eSafety for providing guidance on what social media platforms should be doing now in preparation for the SMMA obligation taking effect on 10 December.

We confirm Kick is progressing solutions including:

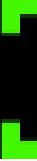
- The deactivation of accounts held by end-users under 16
- Providing early, clear and age-appropriate communications to affected end-users
- Taking reasonable steps to prevent current Australian end-users under 16 with accounts from increasing their declared age to over 16
- Taking reasonable steps to prevent existing Australian end-users under 16 from opening new accounts indicating they are over 16
- Preventing manipulation of our settings to otherwise allow under 16 Australian end-users from holding a Kick account
- Taking reasonable steps to ensure new account holders are over 16

We can also confirm that Kick is engaging with third-party age assurance providers to assist us and integrate with age-estimation and age-verification technologies. We are taking this action with the principles eSafety highlighted during the Consultation on Reasonable Steps in mind. We look forward to the upcoming guidance in the coming weeks.

**Kick as an age-restricted social media platform**

Kick has completed the social media age restrictions assessment made available by eSafety at:

<https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions/assessment>.



1. *Is the service an 'electronic service'?*

Yes.

2. *Is any of the material on the service accessible, or delivered to one or more end-users in Australia?*

Yes.

3. *Does the service allow end-users to post material on the service?*

Yes.

4. *Does the service allow end-users to link to, or interact with other end users?*

Yes.

5. *(a) What is the purpose of the service? (b) Does the purpose include enabling online social interaction between two or more users?*

The purpose of the service is a livestreaming platform. The purpose includes enabling online social interaction between two or more users.

6. *Is online interaction the sole purpose or a significant purpose?*

Online interaction is a significant purpose.

7. *Is service excluded under the Online Safety (Age-Restricted Social Media Platforms) Rules 2025?*

No.

As a result of this assessment, we have concluded Kick is an age-restricted social media platform. Please do not hesitate to contact us at [s 47G\(1\)\(a\)@kick.com](mailto:s 47G(1)(a)@kick.com).

Kind regards,  
Kick Trust & Safety

10 September 2025



To: Ms. Julie Inman Grant  
eSafety Commissioner  
PO Box Q500  
Queen Victoria Building  
Sydney 1230

Via: s 47E(d) [@eSafety.gov.au](mailto:@eSafety.gov.au)

Dear Julie,

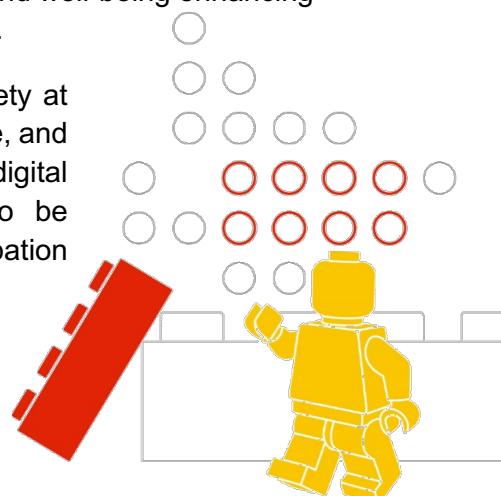
Thank you for your letter (Ref. CC25-0102) dated on 4 September 2025.

We note the efforts undertaken by you and your office on the implementation of the Social Media Minimum Age (SMMA) Act, and appreciate the acknowledgement and consideration of our position on the LEGO Play App.

We reviewed the LEGO Play App against the guidance published to assist services to self-assess whether a service is an age-restricted social media platform self-assessment tool that was published by your office last week, and continue to believe that the LEGO Play App is not an age-restricted social media platform. The summary of our self-assessment is attached in **Annex A** for your reference.

At the LEGO Group, we believe that children are our role models and we on a mission to inspire and develop the builders of tomorrow. In doing so, our approach in creating play experiences for children (physical or digital) prioritises the safety and well-being of children at its core; this means that the play experiences we create for children are designed to help them develop important life skills through safe, fun and playful experiences. To grow the evidence and knowledge on digital play features that contribute to children's well-being, we co-founded the [Responsible Innovation in Technology for Children \(RITEC\)](#) Project with UNICEF. As articulated in our last communication, the research findings found that positive social interactions in safe environments benefit children's learning of social skills, can contribute to different forms of creative play and improve their wellbeing. The LEGO Play App is an example of a product that we have built with this approach, and we continue to believe that the App provides a safe and well-being enhancing space for children to develop important skills to thrive in the 21<sup>st</sup> century.

In addition, we are also firm believers that children, families, and society at large stand to benefit from digital policies that are pragmatic, constructive, and evidence-based. Children and youths are important stakeholders in the digital environment and their voices provide an important perspective to be considered for the development of digital policies. To support the participation





of children and youths in tech policy design in Australia (and the world), we are sponsoring the Tech Policy Design Institute's program for this purpose.

We are excited to continue to contribute to the development of children and to bring positive play and learning opportunities throughout their childhood within a supportive policy environment. We hope that your consideration of the LEGO Play App in relation to the SMMA Act would be favourable and continue to encourage my colleagues and I in our ambition to create play experiences for children with safety and well-being at its core.

We look forward to your positive response on our position, and my colleague, Ms Zhenyi Ng, remains available to engage with you and your office should there be any further questions or clarifications.

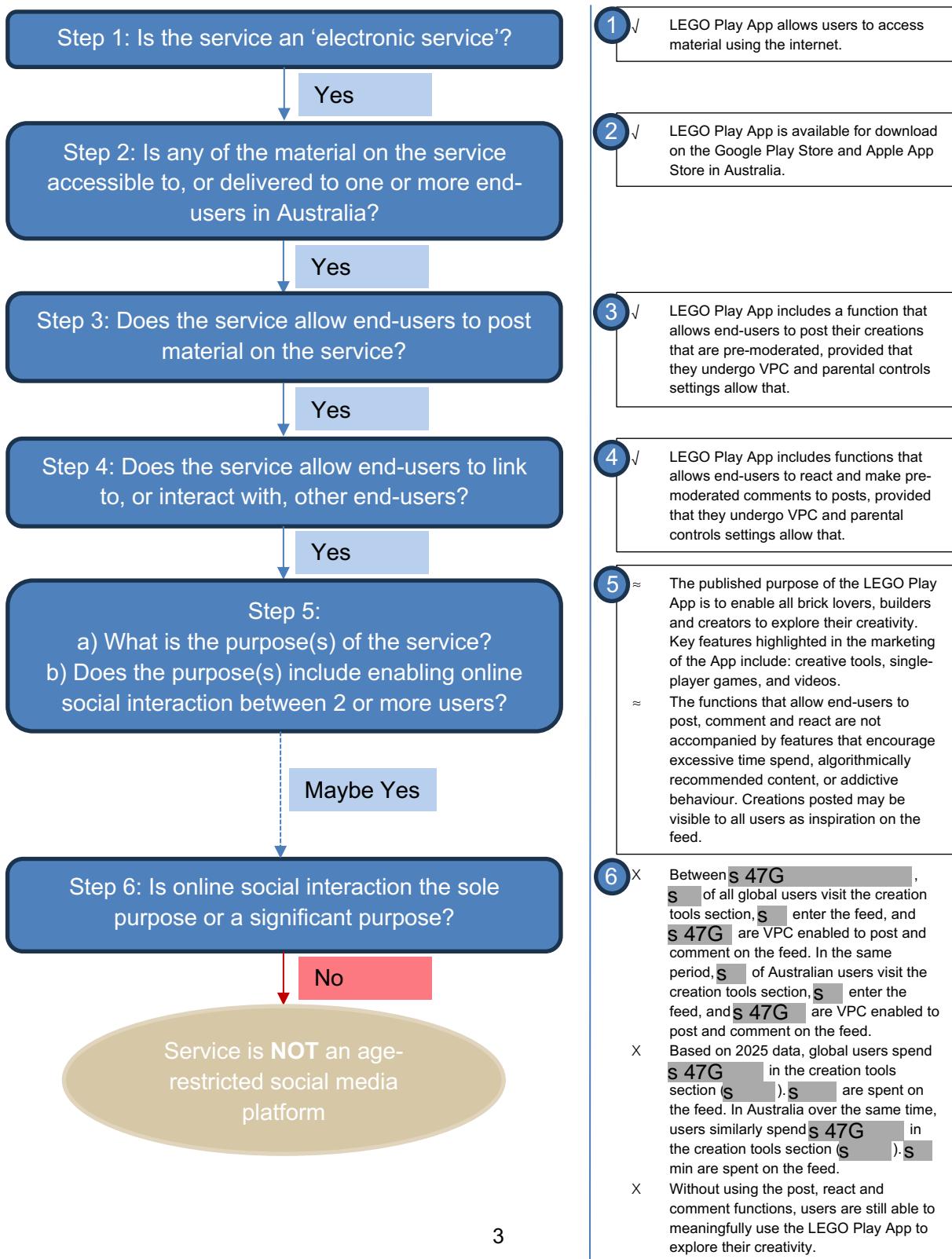
Thank you.

Yours Sincerely,

s 47F



## **Annex A: E-Safety Commissioner's Age-restricted Social Media Platform Self-Assessment Guidance: LEGO Play**





corp.roblox.com

3150 S Delaware St  
San Mateo, CA  
94403

15 September 2025

Julie Inman Grant  
eSafety Commissioner  
By email: s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)

Copy to: s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)  
s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)  
s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)

Dear Julie,

Thank you for your letter of 4 September 2025.

As requested, we are writing to provide eSafety with information we consider relevant to the assessment of whether Roblox is an age-restricted social media platform (**ARSMP**), including whether Roblox is excluded under the Online Safety (Age Restricted Social Media Platforms) Rules 2025 (**Rules**).

Thank you for sharing your guidance on how to assess whether a service is an ARSMP. We have considered this guidance in finalising our assessment of whether Roblox meets the definition of an ARSMP.

In our view, Roblox does not meet the definition of an ARSMP in section 63C(1)(a) of the *Online Safety Act 2021 (OSA)* - s 47G(1)(b)

In any event, in our view it is clear that Roblox is excluded under section 63C(6)(b) of the OSA, which provides that an electronic service is not an ARSMP if it is a service specified in the Rules. Section 5(1)(b) of the Rules specifies "services that have the sole or primary purpose of enabling end-users to play online games with other end-users".

The primary purpose of Roblox is to enable end-users to play online games with other end-users. Online gameplay between end-users is fundamental to Roblox - it is the predominant and most important purpose of our platform. End-users access Roblox to



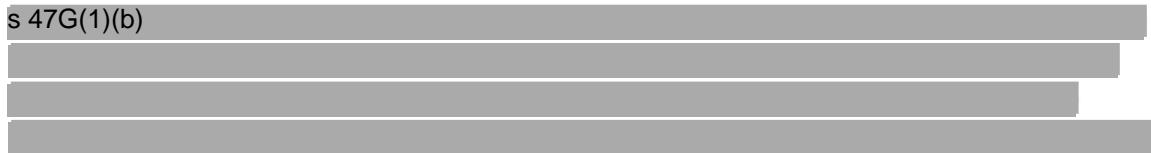


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play online games with other end-users. If we were to take away the ability for end-users to play online games with other end-users, Roblox wouldn't be Roblox.

s 47G(1)(b)

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In the Discussion Paper that accompanied the exposure draft of the Rules, the Government expressly acknowledged that Roblox would be excluded from being an ARSMP, stating that section 5(1)(b) of the Rules "would exclude games such as **Roblox**, Fortnite and Minecraft". We agree with this position and think it is clear that Roblox falls within the scope of the section 5(1)(b) exemption.

Yours sincerely,

s 47F

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# SERVICE ASSESSMENT

## SMAA OBLIGATIONS

17-09-2025

s 47F

# **Service Assessment of The Hub App**

## **for SMMA Obligations**

We recommend that The Hub app not be classified as an age-restricted social media platform under the Online Safety Act 2021 and the Online Safety (Age-Restricted Social Media Platforms) Rules 2025.

### **Purpose and Design of The Hub**

The Hub is a purpose-built platform designed to enable organisations to manage their people, programs, and content within safe, closed digital environments. It was developed as an alternative to mainstream social media, with a deliberate focus on humane technology and an architecture of e-Safety using the online safety act (2021) as a framework.

The platform's core function is to support internal organisational operations, not to facilitate open-ended social interaction. It is sold exclusively via a B2B SaaS model, meaning all usage occurs within the context of a business or not-for-profit organisation's internal structure.

### **The Hub Is NOT a Social Media Platform**

The Hub does not meet the criteria outlined in Section 63C of the Online Safety Act, which defines an age-restricted social media platform as a service with the **sole or** significant purpose of enabling online social interaction between end-users

Key exclusions in The Hub's design include:

- No infinite scroll or autoplay
- No engagement-based reward mechanisms
- No algorithms driven content feeds
- No ephemeral content
- No dopamine-driven comments/engagement
- No encouragement to increase engagement
- No advertising built into the platform
- No on-selling of data
- No promotion of discovering or connecting with other users on the platform.

These features are intentionally omitted to prevent addictive or socially driven usage patterns. Any interaction on the platform is functional and task-oriented, such as accessing training materials, coordinating events, or managing logistics.

## **Nature of User Interaction**

Interactions on The Hub are limited to closed groups within an organisation. There is **no** public posting, no follower systems, and user discovery. Communication is structured and purpose-driven, aligned with the operational needs of the organisation and provides transparent digital oversight for the organisation.

Even though many of our clients are not-for-profits (e.g. schools, churches, charities), The Hub's usage model aligns as 'online business interactions', not social media. Our clients use of the platform is strictly organisational.

## **Applicability of Excluded Service Classes**

We believe The Hub qualifies under Section 5(1)(g) of the Online Safety (Age-Restricted Social Media Platforms) Rules 2025, which excludes services that have a significant purpose of facilitating communication between educational institutions and students or families

While schools and early learning centres are not our primary client base, they do represent over 15% of our user base.

In addition to this our remaining 85% of clients use The Hub for one or more of the following educational uses:

- Distribute educational and organisational content
- Coordinate professional development events
- Manage day-to-day logistics of their programs
- Distribute training material

This further supports our position that The Hub is not designed or used as a social media platform and should therefore be excluded from classification under the age-restriction framework.

## **Commitment to Safety and Compliance**

The Hub was built with e-Safety principles at its core. We remain committed to maintaining a safe, respectful, and transparent environment for all users, and we continue to align our practices with the Basic Online Safety Expectations outlined in the Act.

s 47F





88 Colin P Kelly Jr Street,  
San Francisco, CA 94107  
Tel: 415-448-6673 (main)

September 18, 2025

Julie Inman Grant  
eSafety Commissioner

by email: s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)  
cc: s 47F [@github.com](mailto:@github.com), s 47F [@microsoft.com](mailto:@microsoft.com)

Dear Commissioner Grant:

Thank you for your correspondence dated September 4, 2025. We appreciated the opportunity to participate in eSafety's consultation and share our thoughts on implementation of the Social Media Minimum Age Act. I am writing to let you know that, due to recent developments and engagement with your Industry Codes and Standards Enforcement Team, we now understand GitHub's service classification under the Online Safety Act is as a Model Distribution Platform (a form of DIS), not a social media service, nor an age-restricted social media platform.

### **GitHub is not a Social Media Service**

The Enforcement Team affirmatively reached out to us after the Designated Internet Services Industry Standard - Class 1A and Class 1B Material was finalized, to discuss compliance planning for the DIS Standard. The Enforcement Team repeatedly informed us that we do not qualify as a Social Media Service, but rather, a Designated Internet Service (DIS), and in particular, a Model Distribution Platform. During these discussions, eSafety's position was explained as follows:

[W]e do not consider that Github's 'sole or primary purpose' is 'online social interaction'. That 'individual developers, hobbyists, students, and open-source projects that share their code on the platform' use the service for 'personal reasons' is not the same as doing so for the purposes of 'social interaction', nor is it the same as any social interaction being the 'sole or primary purpose' of the service. (June 20, 2025 correspondence with s 22 ).

GitHub accepts and understands eSafety's position and reasoning, as outlined by the Enforcement Team. In reliance on this information, we have been working to align with the applicable requirements.

The September 4 letter suggests that a service may be considered an “age-restricted social media platform” despite the fact that it is not a social media service. Putting to one side whether this is possible—something we do not concede<sup>1</sup>—this is not an issue for GitHub. The eSafety Enforcement Team has informed us that what occurs on our platform is not “online social interaction.” Thus, we cannot possibly meet the definition in Section 63(C)(1)(a) (to qualify as an “age-restricted social media platform,” “the sole purpose, or a significant purpose, of the service is to enable *online social interaction* between 2 or more end-users”) (emphasis added).

Before being informed of the Commission’s position that code collaboration on our platform does not qualify as “online social interaction,” GitHub presented information to the Commission advocating for a class exemption for software development collaboration platforms. (See “GitHub Supplementary Submission in Response to the Draft Online Safety (Age-Restricted Social Media Platforms) Rules 2025 Consultation”). We believe those reasons continue to apply and I was informed that they were well-received. But this appears to be a moot point, as GitHub does not meet the threshold requirement of Section 63(C)(1)(a).

To sum it up, based on the advice of the eSafety Enforcement team, we now understand that GitHub is neither a social media service, for purposes of section 13, nor meets the threshold requirement of Section 63(C)(1)(a). If this is not eSafety’s understanding, please explain the basis to treat GitHub differently under Section 63(C)(1)(a) than Section 13.

Of course, if it is preferable to schedule a call or meeting to discuss this matter, we are happy to do that as well.

We very much appreciate your attention to this matter and any thoughts you might have.

Best wishes,

s 47F

s 47F

GitHub, Inc.

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<sup>1</sup> It is not feasible for an individual service to comply with multiple regulatory regimes. This is explicitly recognized in other areas of the OSA regulatory framework, most notably where Industry Codes and Standards specify adherence to one option to the exclusion of others. Should the eSafety Commission like more detail on this position, we’re happy to provide more information.

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**From:** s 47F @match.com>  
**Sent:** Thursday, 18 September 2025 10:27 AM  
**To:** eSafety Commissioner; eSafety Industry Supervision; Social Media Minimum Age Restrictions  
**Cc:** s 47F i@match.com; s 47F ; s 47F ; s 47F  
**Subject:** Re: Amended: CC25-0109\_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]

You don't often get email from S @match.com. [Learn why this is important](#)

Dear Julie and team,

Thank you for taking the time to meet with me this week — and for your letter, and the clarity provided regarding eSafety's forthcoming assessments and regulatory guidance.

### **Match Group services and applicability of SMMA**

We note eSafety's preliminary view that some Match Group services may fall within the definition of "age-restricted social media platforms" under section 63C of the Online Safety Act 2021. As discussed previously, because we believe that we have taken strong steps to prevent Australians *under 18* (not just under 16) from accessing our services, and therefore are in compliance regardless of whether we fall within the definition of "age-restricted social media platform," we have not taken a position on whether we are covered by the SMMA. However, to show that we are in compliance, and to reiterate our previous discussions, we set forth below our current age assurance measures.

### **Our current age assurance measures**

We confirm that Match Group already applies minimum age restrictions and undertakes age assurance measures across our services.

Individuals *under the age of 18* are strictly prohibited from using our dating platforms. We enforce this policy through a robust combination of technological solutions and human oversight, aimed at preventing underage access and ensuring platform integrity.

We agree that merely requesting age disclosure is insufficient as a standalone age assurance measure. While it serves as a first step, we implement multiple layers to ensure better accuracy and deterrence:

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- 
- App store restrictions: All Match Group apps are rated 17+ on iOS (the highest available setting) and 18+ on Google Play. Properly configured parental controls can effectively prevent minors from downloading or accessing these services. We also adopt emerging tools, such as Google's "Restrict Declared Minors" feature,
- as they become available.
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- Age-gating at registration: If a user provides a birthdate indicating they are underage,

- the account is automatically blocked. Users who enter an incorrect birthdate may regain access only through verification with a government-issued photo ID. Because we collect identifying information (e.g., phone number, email) prior to requesting age, we can
- prevent re-registration using the same credentials and from the same device until the user reaches the age of eligibility. Notably, our age-gating does not display a prompt requiring users to confirm they are 18+, which leads many underage individuals to self-attest
- truthfully, allowing us to block them at the outset.
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- Image and text-based moderation: We employ a combination of automated tools and human oversight to detect potential underage users. Profile photos are scanned using AI-powered image moderation, with flagged accounts escalated to human moderators for review. In parallel, we use machine learning classifiers and keyword detection to flag language
- in profiles and messages commonly associated with underage users.
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- 
- In-app reporting: Users can easily report suspected underage profiles for immediate review.
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- 
- Photo ID verification: Users who are banned or flagged for suspected age violations may appeal by verifying their identity with a valid government-issued photo ID.
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We continue to invest in strengthening our age assurance systems. Most recently, we completed a large-scale benchmarking initiative to validate the accuracy and recall of our AI-based image moderation capabilities, and as we discussed in our 15 September meeting, are using those findings to continuously improve and retrain the underlying models. We are likewise excited about the introduction of Face Check on Tinder in Australia, which may offer additional opportunities for liveness-based age estimation in the future.

## Preparation for SMMA commencement

We acknowledge eSafety's expectations for platforms, in particular:

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- readiness to identify and deactivate accounts held by under-16 Australian end-users;
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- clear, age-appropriate communications to affected users;
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- 
-

- mechanisms to prevent circumvention; and
- 
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- 
- transparent and fair reporting and appeals processes.

While we believe the strong safeguards described above, designed to prevent under-18 individuals from joining our platforms, already address eSafety's expectations, we are constantly evaluating our age assurance methodologies across the globe. Once published, we will review eSafety's guidance and will incorporate any relevant suggestions to ensure that we meet the standards for keeping under 16s off of our platforms.

Thank you again for the constructive engagement and the opportunity to contribute to the development of clear and practical regulatory guidance.

s 47F

On Thu, Sep 4, 2025 at 9:27 AM s 47F [@match.com](#) wrote:  
Hi s 22, thank you for this. We've received it and will review in due course.

s 47F

Match Group

s 47F [@match.com](#)

s 47F

On Wed, Sep 3, 2025 at 10:52 PM eSafety Commissioner s 47E(d) [@esafety.gov.au](#) wrote:

**OFFICIAL**

Dear s 47E

Many apologies, we understand the link to [How to assess if a service is an age-restricted social media platform | eSafety Commissioner](#) was broken. We have now corrected the link within the attached letter.

Please find re-attached correspondence from the eSafety Commissioner, Julie Inman Grant, providing update on the social media minimum age (SMMA) obligations.

Many thanks

s 22

s 22

Executive Officer

Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22 | s 22



*eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses  
— land, waters and community. We pay our respects to First Nations people, and to Elders past and present.*

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Valve Corporation  
10400 NE 4th Street, Suite 1400  
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vox 425 889 9842  
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September 22, 2025

Julie Inman Grant  
eSafety Commissioner

via email to **s 47E(d)** [@eSafety.gov.au](mailto:@eSafety.gov.au), **s 47E(d)** [@eSafety.gov.au](mailto:@eSafety.gov.au), and  
**s 47E(d)** [@esafety.gov.au](mailto:@esafety.gov.au)

Dear Commissioner Grant:

I write on behalf of Valve Corporation in response to your letter to Liam Lavery dated September 4, 2025, regarding whether Valve's gaming service, Steam, is an age-restricted social media platform as defined in section 63C(1)(a) of the *Online Safety Act 2021* (the "Act"). Mr. Lavery is travelling.

The Rules<sup>1</sup> identify several types of services that are "not age-restricted social media platforms" under the Act, including "services that have the sole or primary purpose of enabling end-users to play online games with other end-users" and "services that have the sole or primary purpose of enabling end-users to share information (such as reviews, technical support or advice) about products or services."

Steam is an online gaming platform—the core experience for Steam users is browsing for, purchasing, and playing games. You can access Steam at <https://store.steampowered.com/>.

Steam does offer some limited community features (called "Steam Community") that are ancillary to users' gaming experiences. You can access Steam Community by clicking the "COMMUNITY" link at the top of the Steam homepage, or by navigating directly to <https://steamcommunity.com/>. Steam users use Steam Community to share information about the games on Steam through features like discussion boards, player profiles, game guides, and game reviews. Like all of Steam, Steam Community is focused on games—posting off-topic content is against the rules. See <https://help.steampowered.com/en/faqs/view/6862-8119-C23E-EA7B>. Steam Community is not monetized at all; Valve does not sell advertising or Steam user data.

In short, Steam's primary purpose is "enabling end-users to play online games with other end-users." Steam Community is ancillary to Steam and exists to support Steam's primary purpose by enabling Steam users to "share information (such as reviews, technical support or advice) about" the games on Steam. Accordingly, Steam is not "an age-restricted social media platform" under the Act.

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<sup>1</sup> The "Rules" were defined in your letter as the *Online Safety (Age Restricted Social Media Platforms) Rules 2025* promulgated under the Act on 29 July 2025 by the Minister for Communications, the Honourable Anika Wells MP. The Rules are available online at <https://www.legislation.gov.au/F2025L00889/latest/text>.

If you or your staff would like to discuss, please contact me via email at  [s47F@valvesoftware.com](mailto:s47F@valvesoftware.com).

Sincerely,

 s 47F



CONFIDENTIAL

12 September 2025

Via email s 47E(d) [@esafety.gov.au\)](mailto:@esafety.gov.au)  
cc: s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)

Ms Julie Inman Grant  
eSafety Commissioner  
PO Box Q500, Queen Victoria Building  
NSW 1230  
Australia

**STRICTLY PRIVATE & CONFIDENTIAL**

**Re: Applicability of Australia's Social Media Age Restrictions to Pinterest**

Dear Ms Inman Grant,

Thank you and the eSafety team for meeting with the Pinterest team on 12 August 2025 and with myself and s 47F [REDACTED], on 11 August 2025 to discuss Australia's upcoming social media minimum age obligation ("SMMA obligation"). We also thank you for your letter of 4 September 2025 and welcome the opportunity to provide this response, which sets out in further detail why we consider Pinterest out of scope of the SMMA obligation.

Please note that the information we have provided in this response is provided on the understanding that it will be treated by eSafety as confidential as it contains information that is not known or available to the public. Accordingly, we respectfully request that the contents of this letter will not be disclosed outside of eSafety, save where eSafety is legally permitted or required to do so. In the event eSafety intends to disclose this information to a third party, Pinterest kindly requests that eSafety consults with us before doing so to ensure that we have a reasonable opportunity to make representations concerning any disclosure.

**I. Executive Summary**

Pinterest is designed, built and used as a search and discovery platform. s 47G(1) (a), s 47G(1)(b) [REDACTED]

Therefore, we do not fall within the definition of "age-restricted social media platform" as defined

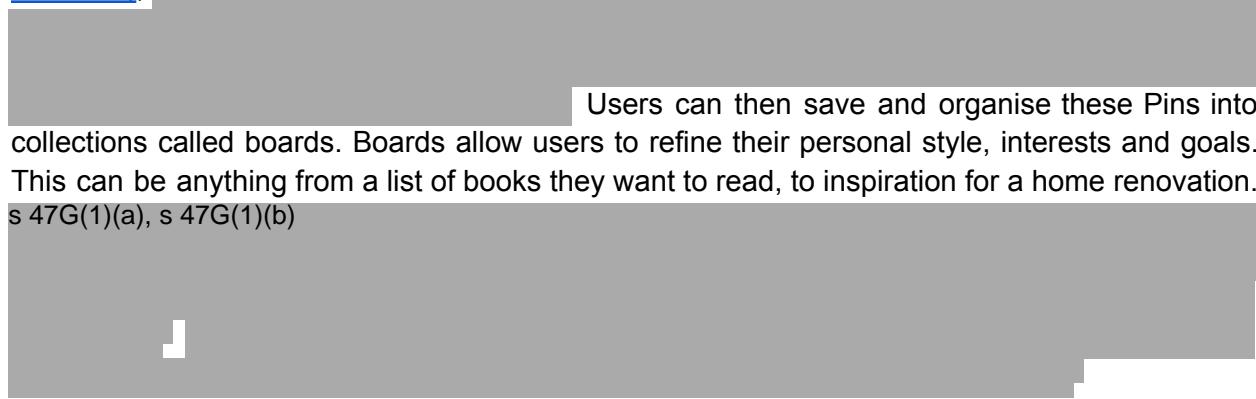
in the *Online Safety Amendment (Social Media Minimum Age) Act 2024* (the “**Amendment**”) and as such, we do not consider Pinterest in scope of the SMMA obligation.

## II. How Pinterest is used

s 47G(1)(a), s 47G(1)(b)



To aid a user’s search journey, Pinterest shows visual recommendations called Pins. Pins can be created by users uploading photos or videos or bookmarking content from the web and optionally providing a text caption, although as further discussed in [Section III\(d\) \(Content on Pinterest\)](#), s 47G(1)(a), s 47G(1)(b)



Pinterest is therefore largely a space for personal experience, as the primary purpose is to facilitate users in finding, exploring, collecting and curating discovered or uploaded Pins into boards. s 47G(1)(a), s 47G(1)(b)



Boards do not need to be shared with anyone to get the full value of Pinterest’s service. Pinterest users can engage in creative, educational and inspirational activity as they build boards that match their style, interests or goals without

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s 47G(1)(a), s 47G(1)(b)

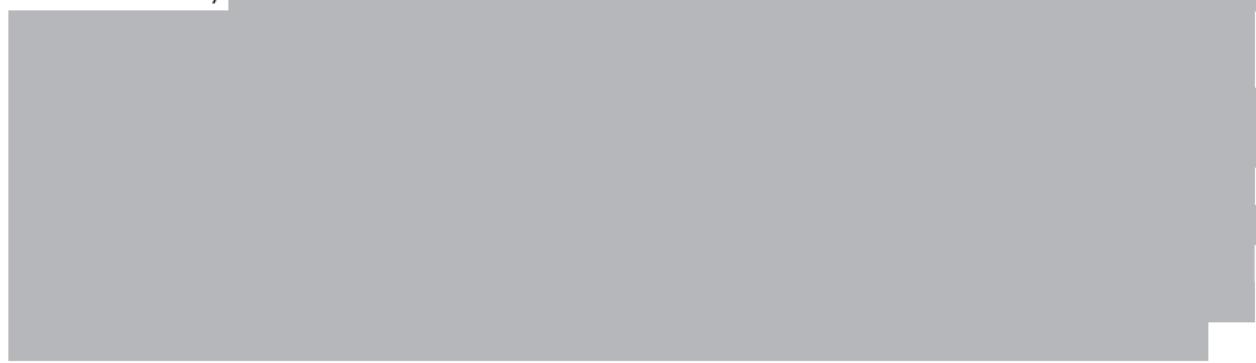


concern for social validation and engagement. Importantly, creating a Pin or saving a Pin to a board is not the same as making a post on a social media site. Pins are not broadcast to a user's network and the Pin is not highlighted through notifications or alerts. Users can choose to keep uploaded Pins private, or make them public with comments turned on or off.

s 47G(1)(a), s 47G(1)(b)



Our goal is to continue to enable a meaningful and productive experience that empowers our users to go from discovering a great idea online, to implementing that idea in their real life. In order to do so, s 47G(1)(a), s 47G(1)(b)

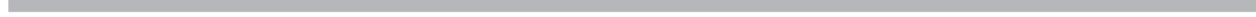


### **III. User engagement with our features and functions**

As detailed in [Section II \(How Pinterest is used\)](#), s 47G(1)(a), s 47G(1)(b)



Pinterest has undertaken a stocktake of each feature and function that might be considered to be an enabler of social interaction in accordance with Step 6 of eSafety's age restricted social media platform self-assessment guidance (the "Guidance")<sup>8</sup> to determine whether they might be considered a "significant" purpose of Pinterest. The qualitative and quantitative analysis detailed in the following paragraphs of this section highlight s 47G(1)(a), s 47G(1)(b)



<sup>6</sup> s 47G

<sup>7</sup> s 47G

<sup>8</sup>

<https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions/assessment#step-6>

s 47G(1)(a), s 47G(1)(b)



**a) *Following/Followers***

s 47G(1)(a), s 47G(1)(b)



Pinterest offers a private profile for all users, as the only option for users under the age of 16, and as the default option for users aged 16 and 17. Private accounts are undiscoverable on Pinterest search and search engines, and Pinterest profiles, boards and Pins for these users are only visible to followers approved by the user. Users with private profiles may only be “followed” if the user sends a unique profile link to the prospective follower. Unique profile links act as an invitation and must be shared off-platform (such as by text, email or third party messaging apps). These safeguards mean that younger users are typically not meeting and connecting with new people on Pinterest, but rather only connecting with people they already know.

s 47G(1)(a), s 47G(1)(b)



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<sup>9</sup> s 47G(1)(a), s 47G(1)

<sup>10</sup>(b)

<sup>11</sup>

s 47G(1)(a), s 47G(1)(b)

In addition, as explained above in Section II (How Pinterest is used) and in Section III, part (d) (Content on Pinterest) below, users do not come to Pinterest to post pictures of themselves, nor do they post on Pinterest with the intention of becoming viral or gaining followers, especially as s 47G(1)(a), s 47G(1)(b)

**b) Messaging**

s 47G(1)(a), s 47G(1)(b)

[REDACTED]

**c) Commenting**

s 47G(1)(a), s 47G(1)(b)

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<sup>12</sup> s 47G

<sup>13</sup> s 47G

s 47G(1)(a), s 47G(1)(b)



Additionally, we have implemented additional safeguards to keep teens safer in the comments section of a Pin. Users under 16 cannot be mentioned or tagged in comments and usernames are optionally disabled.

s 47G(1)(a), s 47G(1)(b)



***d) Content on Pinterest***

As explained in [Section II \(How Pinterest is used\)](#), our users come to Pinterest to find visual ideas and inspiration and save and organise these Pins into boards to refine and curate interests, ideas and goals. Pinterest is not a place where users come to post personal or family photos to share and discuss with their friends and family.

s 47G(1)(a), s 47G(1)(b)



As shown from the data above, rather than uploading their own content, our users primarily come to Pinterest to find and save Pins. It's important to note that where a user saves a Pin to a board or "Repins", this works as a bookmark for an individual to revisit later, rather than as a public conversation starter or social broadcast to that individual's followers accompanied by a cascade of notifications s 47G(1)(a), s 47G(1)(b)



s 47G(1)(a), s 47G(1)(b)



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<sup>14</sup> s 47G(1)(a), s 47G(1)

<sup>15</sup> (b)

<sup>16</sup>

s 47G(1)(a), s 47G(1)(b)



s 47G(1)(a), s 47G(1)(b)



In addition, as described above, profiles for users under 16 are set to private only, and set to private by default for users age 16 and 17. Private profiles are undiscoverable and access is restricted to people to whom the user has shared an invite link off-platform. These safety-by-design choices further limit public posting and network building by teens.

Finally, we do not have livestreams or ephemeral media, both of which are types of content that encourage real-time social interactions using scarcity and urgency and which are often boosted by social media platforms due to high-engagement by users, encouraging more time-spent on platform, social ranking and peer-to-peer interaction.

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<sup>17</sup> s 47G





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**IV. Why Pinterest does not fall within the definition of “Age-restricted social media platform”**

As detailed in the above section, our functions and features that could be considered “social” do not materially influence user behaviour by encouraging social interaction, and the actual use and engagement on Pinterest, as demonstrated by the data set out above, confirms that people do not come to Pinterest for social interaction. s 47G(1)(a), s 47G(1)(b)

A large rectangular area of the page is covered by a solid grey color, indicating that the content has been redacted.

In light of the above, and consistent with the test set out in the Amendment and Guidance, Pinterest's “sole” or “significant” purpose is definitively not to enable social interaction, but rather, is designed, built and actually used by our users as a visual search and discovery platform. Pinterest therefore does not meet the definition of “age-restricted social media platform”. We would respectfully request that eSafety confirm Pinterest is out of scope of the SMMA obligation accordingly.

**V. Pinterest's commitment to online safety**

At Pinterest, we have a longstanding and industry-leading commitment to making our platform a safe place for everyone, especially young people, and this will not change based on the inapplicability of the SMMA obligation to Pinterest. As discussed in our meeting on 11 August, s 47F

’s view is that companies should be competing on safety, and digital platforms should be doing more to keep teens safe online. Pinterest is committed to being a leader in online safety. Accordingly, we have designed and continue to develop our platform with safety for all global users as a priority, regardless of whether users in a particular country are protected by online safety regulation. The results of our comprehensive risk assessments conducted for compliance with laws in other jurisdictions (such as the European Union’s Digital Services Act and the United Kingdom’s Online Safety Act) show that our risk levels are generally low, in light of our effective mitigation measures.

We have implemented robust Community Guidelines which prohibit various types of content, including content that might be particularly harmful to young people. These Community Guidelines are carefully developed and continuously iterated on, based on reports from people using our service, information from outside experts, trends we have identified on other platforms and ongoing penetration testing of our own service. Our teams comprehensively operationalise

these policies, utilising user reports as well as manual and automated content moderation processes, to enforce against violations of our policies that may be harmful to all users, including teens. In Q4 2024, 77% of Pins deactivated for hateful activities were removed before being seen by a single user; 73% of Pins deactivated for self-injury or harmful behaviour were removed before being seen by a single user; and 98% of Pins deactivated for violence were removed before being seen by a single user.<sup>18</sup> Indeed, eSafety's own research into online harms found Pinterest to be a uniquely safe platform compared to other online platforms in the study.<sup>19</sup>

In addition to moderating for harmful content, Pinterest consistently accounts for minors' safety and wellbeing when considering and implementing functionalities and features. s 47G(1)(a), s 47G(1)(b)

In addition, where appropriate, we display advisories in response to certain search terms for sensitive topics which connect users with free, country-specific support resources and helplines. We also engage in various media literacy measures, including providing articles on safety, privacy, content personalisation, and wellness throughout our Help Centre; publishing robust global transparency reporting; using AI to show representation of various body types, skin tones, and hair patterns in search results; and promoting civility and respect online with a just-in-time reminder which surfaces the first time a user makes a comment, reminding them that comments should be kind, purposeful and constructive.

Pinterest is a founding signatory of the Inspired Internet Pledge, an industry wide initiative created by the Digital Wellness Lab at Boston Children's Hospital in collaboration with Pinterest. The Inspired Internet Pledge aims to unite the tech industry with the common goal of making the internet a safer and healthier place for everyone, especially young people.<sup>20</sup> As part of this pledge, Pinterest has partnered with academics at UC Berkeley to conduct research and publish a 'Field Guide to Non-Engagement Signals'.<sup>21</sup> This field guide provides actionable guidance for how online platforms can tune for emotional well-being. Pinterest prioritises tuning for wellbeing by using a combination of explicit engagement signals like saves, rigorous enforcement of community guidelines, and survey-based personalisation to give Pinners a feed of high-quality

<sup>18</sup> <https://policy.pinterest.com/transparency-report-h2-2024>; the data in this sentence relates to Q4 2024 and whether users saw the Pin during the reporting period of Q4 2024.

<sup>19</sup>

<https://www.esafety.gov.au/sites/default/files/2025-07/Digital-use-and-risk-Online-platform-engagement-10-to-15.pdf?v=1756795479844>

<sup>20</sup> <https://newsroom.pinterest.com/en-gb/news/the-inspired-internet-pledge/>

<sup>21</sup> <https://medium.com/pinterest-engineering/the-field-guide-to-non-engagement-signals-a4dd9089a176>; <https://arxiv.org/abs/2402.06831>



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content that's tuned to inspire them.<sup>22</sup> The success of Pinterest's commitment to tuning for wellbeing is evidenced in recent research by USC into negative personal experiences online. The research showed that compared to a broad range of online platforms, "Pinterest obtained the lowest rate of these negative experiences in between August and October of 2023 and has maintained that ranking ever since."<sup>23</sup>

We are committed to continually reviewing and updating our safety policies and tools based on evolving risks and technological solutions to achieve our goal of providing a safe and positive platform for our users, regardless of the fact we are out of scope of the SMMA obligation. In addition, we note that Pinterest is still regulated under the Australia Online Safety Act (the "Act") and is subject to the relevant codes as a Relevant Electronic Service ("RES"), as designated by eSafety on 13 January 2025. Pinterest is committed to compliance with such and we have taken steps to address the residual obligations under the Act in addition to the steps we have already taken mentioned above. For example, we have already published a Help Centre article to provide resources to individuals in Australia and to comply with the Act.<sup>24</sup>

We note eSafety's concern that Pinterest previously declared itself a social media service ("SMS") under the Act in 2023. At that time, we were required to nominate a category. We nominated SMS as the closest analogue because eSafety had not yet approved codes or standards for RES. However, we are not, and were not an SMS. We agree with eSafety's recent designation of Pinterest as a RES. We are happy to work together with eSafety to ensure the correct designation.

## VI. Age assurance methods

As discussed during our consultation meeting, we understand that information regarding the practical application and implementation of age assurance technologies are of great interest to eSafety, particularly to consider the best practices and recommendations for services that are in scope of the SMMA obligation. s 47G(1)(a), s 47G(1)(b)



<sup>22</sup> <https://medium.com/pinterest-engineering/healthier-personalization-with-surveys-65177cf9bea8>

<sup>23</sup> <https://psychotech.substack.com/p/social-media-experiences-across-nearly>

<sup>24</sup> <https://help.pinterest.com/en-gb/article/australia-online-safety-act>



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s 47G(1)(a), s 47G(1)(b)



**VII. Next Steps**

Pinterest is grateful for the opportunity to present this written submission. We welcome further engagement as part of this process, and if it would be of assistance, we would be happy to elaborate on or discuss any of the points raised in this submission with eSafety. Thank you for your engagement and we look forward to hearing from you.

Yours sincerely,

s 47F



Pinterest, Inc



15 September 2025

Julie Inman Grant  
eSafety Commissioner  
By email: s [REDACTED] [@esafety.gov.au  
Cc: s 47E\(d\) \[REDACTED\] \[@esafety.gov.au\]\(mailto:@esafety.gov.au\)](mailto:@esafety.gov.au)

Dear Julie,

Thank you for your letter dated 4 September 2025, regarding the Social Media Minimum Age (SMMA) obligations and the guidance on how to assess whether a service is considered an age-restricted social media platform under the Online Safety Act 2021. We appreciate the ongoing guidance from eSafety as we work to understand and prepare for these new requirements.

We understand that the SMMA obligations are set to take effect on 10 December 2025 and that eSafety will be conducting its own preliminary assessment of Twitch. s 47G(1)(a), s 47G(1)(b)

We always appreciate eSafety's transparency and openness to discuss these matters directly, and we would like to schedule a follow-up meeting with your team at the earliest opportunity. We look forward to continuing our constructive engagement and working together to achieve the intended outcomes of the SMMA obligations.

Sincerely,  
s 47F

## VP Global Public Policy Twitch Interactive Inc.