



Pinterest Response to Consultation: A safer life online for women and girls
23 May 2025

Introduction

Pinterest is a visual discovery engine where people around the world go to get the inspiration to create a life they love. Browsing and saving visual ideas on Pinterest helps users imagine what their future could look like, and go from inspiration to reality.

Pinterest shows users visual recommendations called Pins. Pins are created by both individuals and businesses by uploading photos or videos or bookmarking content from the web, and providing a text caption. Users can save and organise these recommendations into collections called boards. Some of our most common use cases include food, beauty, home decor, and travel.

The following is Pinterest's response to the consultation published on 25 February 2025 (the "Consultation") by the Office of Communications (Ofcom) on its draft guidance for how online platforms can do more to support women and girls' online safety (the

“Guidance”), in addition to the applicable Codes of Practice and risk assessment guidance enacted under the Online Safety Act (OSA). Pinterest welcomes the opportunity to respond to the Consultation, as we share Ofcom’s goal of fostering a safe and positive online environment, particularly for users who face unique risks, and support its objective of creating guidance that is proportionate and adaptable to the varied platforms in the online ecosystem.

Pinterest’s commitment to online safety for women and girls

Pinterest has a longstanding commitment to making our platform a safe place for everyone, which is important for both our users and for our business goals. We view a positive, inspiring environment as essential to our user experience, and accordingly, we have developed Community Guidelines that broadly prohibit various types of content that may be harmful to users, including but not limited to all forms of primary priority and priority content as defined in the OSA.

While all content that violates our Community Guidelines might be considered harmful to women and girls, there are also specific areas of our policies that address harms that may disproportionately affect them, including the following policies that map closely to the four areas of harm identified by Ofcom in the Guidance:

- Hateful activities policy: Prohibits slurs or negative stereotypes; support for discriminatory ideas, including limiting women’s rights; denial of an individual’s gender identity; and content condoning or trivialising violence against vulnerable groups.
- Harassment and criticism policy: Prohibits cyberbullying, shaming people for their bodies or assumed sexual or romantic history, sexual remarks about people’s bodies, and solicitations or offers of sexual acts.
- Self-injury and harmful behavior policy: Prohibits self-harm promotion, suicidal thinking and quotes, and encouragement of disordered eating.
- Graphic violence and threats policy: Prohibits content showing the use of violence, threats of violence, and glorification of violence.
- Child safety policy: Prohibits any content that might exploit or endanger minors, including child sexual abuse material, sexualisation of minors, and grooming behaviors.
- Adult content policy: Prohibits adult and sexually exploitative content, including pornography, sexualised content, revenge porn and up-skirt images, and financial sextortion instructions or tools.

We have engaged with third-party expert groups when creating and updating our policies, including all of those mentioned above, and will continue to do so. These expert groups may flag risks and content trends related to gender-based harms, such as online exploitation, harassment, and non-consensual intimate images (NCII), as well as lessons learned from the wider content ecosystem.

We enforce our policies through a robust content moderation system, utilising a combination of automated tools, which use a combination of signals to identify and take action against potentially violating content; manual review, in which human reviewers moderate content identified by our automated tools or reported by users or third parties; and hybrid actions, in which a team member determines that a Pin violates policy and automated systems help expand that decision to enforce against machine-identified matching Pins.¹

In addition to leveraging our own internal tools, Pinterest engages with industry groups and external third-party experts to provide additional content moderation support. These third parties are experts in specific harm types, and they keep us informed of online trends and help us detect whether those trends are occurring on Pinterest. The new and emerging trends and other signals we receive from these experts are reviewed and, where appropriate, we build these trends and signals into our content moderation tools. We may also carry out targeted enforcement efforts based on signals provided by these third parties and update our moderation tools based on the results of those enforcement efforts.

Alongside global enforcement of our content policies, Pinterest utilises a number of features that are specifically designed to promote teen safety on our platform. For example, Pinterest offers a private profile as the default and only option for users under the age of 16, and the default option for users aged 16 and 17. Private accounts are undiscoverable on Pinterest search and search engines, and profiles, boards and Pins for these users will only be visible to followers approved by the user.² Users with private profiles are able to connect with family and friends by sending a unique profile link, and all users have the ability to review and remove followers. Further, teens under the age of 16 can only send and receive messages from mutual followers who they have invited to follow them through a unique profile link. Teens under the age of 18 can only receive messages from mutual followers, and can only receive message requests from users they follow. Pinterest also offers a Parental Passcode feature for users under the age of

¹ A summary of Pinterest's policy enforcement measures is available at: <https://policy.pinterest.com/enforcement>

² In addition to being the default setting for teen users, any user can choose to make their profile private at any time.

18, which allows parents and caregivers to set up a 4-digit passcode to lock certain settings and have oversight of their teen’s Pinterest account.³

In addition to moderating potentially harmful content, we take numerous proactive steps to support the wellbeing of the people who use our service, including with regards to issues that may disproportionately affect women and girls. For example, Pinterest surfaces advisories in response to search terms for sensitive topics such as self harm or disordered eating, which connect users with free, country-specific support resources and helplines. Our Help Center also contains several pages with guidance on how to combat harmful content on Pinterest along with links to external resources, including pages on suicide, self-harm, and domestic violence prevention;⁴ and on combating image-based sexual abuse.⁵

These efforts are effective in providing a high level of safety for women and girls on Pinterest, but we know that the work needed to achieve our goal of providing a safe and positive platform for our users is ongoing. We’re committed to continually reviewing and updating our safety policies, tools, and technologies based on evolving risks, and finding new ways to promote media literacy and user awareness of our safety features. Keeping our community safe is an industry-wide challenge as online trends and technological solutions continue to evolve, and we remain committed to exploring the best ways to achieve this goal. Indeed, as a founding signatory of The Inspired Internet Pledge, Pinterest has publicly pledged to centre its commitment to making the internet a healthier place through its product, thought leadership, policies, and strategic giving.⁶

Comments on proposed good practices (Consultation Question 3)

As Ofcom points out, the “foundational steps” provided for in the Guidance are drawn from the measures set out in the Codes of Practice and guidance on Illegal Harms, Protection of Children and Transparency that have been promulgated under the OSA. These steps are either part of Pinterest’s existing measures or planned as part of its implementation of the OSA, and accordingly, we do not have comments on them at this time.

³ More information on these features can be found in Pinterest’s Teen Safety hub, as well as our Help Centre:

<https://business.pinterest.com/teen-safety-on-pinterest/>

<https://help.pinterest.com/article/teen-safety-options/>

<https://help.pinterest.com/article/resources-for-parents-and-caregivers-of-teens/>

<https://help.pinterest.com/article/manage-a-parental-passcode>

⁴ Accessible at: <https://help.pinterest.com/article/suicide-and-self-harm-prevention>

⁵ Accessible at: <https://help.pinterest.com/article/combating-image-based-sexual-abuse>

⁶ For more information on The Inspired Internet Pledge, please see:

<https://inspiredinternet.org/signatory/pinterest/>

The “good practices” set forth in the Guidance represent more ambitious steps that platforms can take to support online safety for women and girls. Pinterest already utilises a significant number of these practices as components of our stringent content safety policies, robust content moderation systems, and supports for users’ safety and mental health. Several of these measures were detailed above, including how Pinterest consults with subject matter experts to develop its Community Guidelines, sets strong safety and privacy defaults for teen users, and relies on external assessors to help monitor the threat landscape.

Another example would be the design of Pinterest’s recommender systems, which prioritise recommendations of high-quality, personalised, and inspirational content over content that is merely new or trending; and also utilise machine learning models that downrank content similar to content that has been deactivated by our content moderation systems, as well as content that is not policy-violating but may be harmful in large amounts. Users can also exercise control over the content that is recommended to them by removing topics they are no longer interested in, unfollowing accounts or boards, or hiding Pins from their feed, all of which helps Pinterest understand the kinds of Pins they do or don’t want to see.

Pinterest has also demonstrated a strong commitment to media literacy. We engage in various media literacy measures, including publishing detailed and readable policies; providing various articles on safety, privacy, content personalisation, and wellness throughout our Help Centre; surfacing search advisories in response to search queries regarding sensitive topics; publishing robust 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 through our Creator Code, a set of guidelines prompting Pinterest users to lead with kindness when creating new content or interacting with other people on Pinterest,⁷ as well as 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 has adopted Ofcom’s Best Practice Principles for Media Literacy by Design, and we look forward to continued engagement with Ofcom on this topic.

While Pinterest is aligned with the objectives of the good practice steps and has many of them in place already, as detailed herein we do have some concerns regarding the effectiveness, applicability, and risks of certain of them, particularly in the context of Pinterest’s service and existing content moderation systems.

⁷ Accessible at: <https://create.pinterest.com/creator-code/>

Disaggregating transparency reporting based on race

In Section 3.26(a) of the Guidance, Ofcom recommends that platforms enhance their transparency reporting efforts by publishing race-disaggregated data on user reports and outcomes. Pinterest's global Transparency Report⁸ (and, presumably, its future transparency reporting under the OSA) includes information about the reports and actions taken in connection with policies related to gender-based harms. Pinterest is unable to disaggregate this data by race, though, as it does not collect data on users' race. This is consistent with principles of data minimisation, as enshrined in the UK General Data Protection Regulation, which hold that platforms should only collect, use, and retain personal data that is necessary for a specific purpose. We are encouraged that Ofcom limits the recommendation in Section 3.26(a) to instances where this data is already available to providers. Accordingly, we believe that the failure to follow this recommendation should not be held against Pinterest or other similarly-situated platforms in any assessment of their practices.

Disaggregating transparency reporting based on bystanders versus targeted users

In Section 3.26(a) of the Guidance, Ofcom recommends that platforms' transparency reports segment information on user reports based on whether reporters were "active bystanders who are not targeted by abuse but report content to support others" versus "the targeted users themselves."

Pinterest's user reporting flow for potentially harmful content does not distinguish between "bystanders" and "targeted users," and it likely would not be possible to infer this status from the reported content or the user's profile. Also, some content may be harmful without targeting any particular user.

We believe that enabling this form of reporting by asking reporters to self-identify as bystanders or targets could actually be counterproductive. Users are likely to spend only a certain amount of time and attention on reporting a piece of harmful content, so we aim to keep our reporting flow as simple as possible to encourage the submission of reports. Users may not view themselves as bystanders or targets, or those categories may not fit the type of the violation at issue. Accordingly, if users were asked to identify themselves as bystanders or targets it could introduce friction into the reporting process and prevent users from completing reports, ultimately resulting in fewer reports and less violative content being reviewed and actioned. As such, we believe that preserving our existing notice and takedown process would be more effective in keeping our platform

⁸ Accessible at: <https://policy.pinterest.com/transparency-report>

safe. We suggest that this practice either be left out of the final Guidance, or at least recommended only to platforms that already collect this information.

Dedicated reporting channels for gender-based harms

In Section 5.25(g) of the Guidance, Ofcom recommends that platforms create dedicated reporting and review channels for gender-based harms.

Pinterest allows users to report any type of policy violation through a user-friendly reporting mechanism. In both the mobile app and desktop versions of Pinterest, users can report policy-violating content by clicking the ellipsis icon (...) that appears next to each Pin, board, profile, and comment on Pinterest. They then follow prompts to choose from a menu of reporting reasons that includes all of Pinterest's content-safety policies in a simplified list. Any person, including non-users and logged-out Pinterest users, can follow a similar reporting process in our Help Centre.⁹ Our team is trained to review reported content across all of our content safety policies and action it efficiently.

On the user side, adding a dedicated reporting channel for gender-based harms risks complicating the reporting process and thereby discouraging reports, similarly to the discussion above regarding Guidance Section 3.26(a). As for Pinterest's operations, we are concerned that adding a dedicated channel would impose additional costs for development, maintenance, and staffing of that channel, while not offering a commensurate benefit to users, as their reports are already being actioned expeditiously. Rather than establishing separate channels for different types of harms, we believe it is more efficient for platforms to ensure that their reporting channels are accessible and easy to use for everyone on their service.

Feedback on proposal to publish an assessment (Consultation Question 4)

Ofcom intends to publish an assessment of how platforms are addressing women and girls' safety 18 months after finalising the Guidance, based on how platforms are or are not taking up the foundational and good practice steps, as well as on feedback from researchers, civil society organisations, and women and girls across the UK. We believe that publishing an assessment would be a helpful way to showcase good practices and allow platforms to learn from each other's experiences. However, we are concerned that the assessment may lead to a situation where the Guidance's good practice steps are effectively treated as prescriptive, which would be contrary to the principles of flexibility and proportionality built into the OSA.

⁹ Pinterest's Help Centre reporting form is accessible at: <https://help.pinterest.com/contact>

Throughout the implementation of the OSA, Pinterest has been encouraged by Ofcom's commitment to having platforms carry out online safety measures that are proportionate to their differing risk profiles and operational capacities, including the use of alternative measures where they would provide equivalent protection to those required or recommended by Ofcom. This approach allows platforms to implement measures that are suitable and effective for their unique user bases, use cases, and product feature sets. It also helps to preserve competition in the digital sector by allowing platforms to implement measures that are practicable and tailored to the OSA's objectives.

The assessment should reflect these principles by focusing on platforms' effectiveness in meeting the objectives set out in the Guidance, as opposed to their ability to utilise each of the particular measures set out in the Guidance. If the assessment is overly focused on platforms' uptake of the Guidance, it may not accurately reflect how platforms are successfully mitigating risk of online harm to women and girls on their respective platforms. Further, it could have the unintended effect of making the good practice steps effectively required due to pressure on platforms to avoid negative findings in the assessment, which may lead them to implement measures that are not effective or practicable for their services.

To avoid these outcomes, the assessment should be holistic, taking into account the size of the platform, its functionalities and use cases, the risk to users, existing mitigation measures, relevant industry standards, users' rights, and the platform's resources compared to the cost and effectiveness of the proposed measures. We are encouraged by Ofcom's statements in the Guidance regarding its intention to collaboratively engage with platforms leading up to publication of the assessment. In particular, we propose that platforms be permitted to comment on any proposed findings regarding their platform that Ofcom intends to publish in the assessment, so that they can provide any additional context that may be necessary to assess the measures taken or not taken in this area.

Conclusion

Pinterest is grateful for the opportunity to contribute to the important work being done by Ofcom in developing the Guidance. 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 response or any other matters of interest to Ofcom.

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