10 Sept 2024



The Hon. Jeanne Shaheen	The Hon. Rick Scott	The Hon. Joe Manchin III
United States Senate	United States Senate	United States Senate
The Hon. Mazie K. Hirono	The Hon. Maggie Hassan	The Hon. Catherine Cortez Masto
United States Senate	United States Senate	United States Senate
The Hon. Ron Wyden	The Hon. Angus S. King, Jr.	The Hon. Richard J. Blumenthal
United States Senate	United States Senate	United States Senate
The Hon. Marsha Blackburn	The Hon. Robert P. Casey	The Hon. Marco Rubio
United States Senate	United States Senate	United States Senate
The Hon. Sherrod Brown United States Senate	The Hon. Charles E. Grassley United States Senate	

Via email: <u>Michael_Kans@shaheen.senate.gov</u>

Dear Senators Shaheen, Scott, and co-signatories:

Thank you for the opportunity to provide information on how Twitch, an interactive live streaming service, is addressing non-consensual intimate image (NII) abuse.

We take this issue extremely seriously. Our <u>Community Guidelines</u> explicitly prohibit the sharing or promotion of NII content—including the creation and sharing of synthetic NII—and violations of this policy can result in an indefinite suspension on the first offense. Our Adult Nudity policy also prohibits real and synthetic NII, such that even if this content is shown only briefly or, for example, shown to express outrage or disapproval of the content, it will be removed and will result in an enforcement.

We identify potential violations of these policies using a combination of machine detection and user reporting. Our safety operations team works 24/7/365 across the globe to quickly review content and accounts flagged by users and by our machine detection models. In H2 2023, 95.0% of these reports were reviewed in under 1 hour, and 99.95% were reviewed in under 24 hours. We also apply safety by design principles to assess the potential safety risks of every product ahead of launch, so that we can update the product design and mitigate harms before they occur. For example, applying safety-by-design principles, we do not allow users to send images in chat to reduce the risk of NII, or other unwanted sexual imagery, being shared in these formats.

We continue to evaluate our own policies to ensure they're effective in protecting our community from evolving forms of harm. In January 2023, a streamer broadcasted themself viewing synthetic NII of female streamers. We quickly issued the appropriate enforcement actions and kicked off a review to identify whether there were any gaps in our policies and processes, and to determine how we could better support our female community members. We sought feedback from our streamer community and consulted with subject matter experts, including the Cyber Civil Rights Initiative (CCRI) and the UK Revenge Porn Helpline (who runs StopNCII.org). We updated our Community Guidelines and put out a <u>blog post</u> to clarify for our community how our policies addressed synthetic NII, and shared helpful resources. We also hosted a 'Creator Camp' program in partnership with the UK Revenge Porn Helpline to educate streamers about NII material and what steps they can take to protect themselves, including creating a digital fingerprint of any NII images through StopNCII.org, and TakeItDown if they are under 18.

While we direct our users who have experienced NII to work with StopNCII.org and TakeItDown and are strong proponents of their work, we do not currently implement their hash matching technology. As Twitch is a live streaming service, where the vast majority of content is new, live, and ephemeral (as opposed to pre-recorded and uploaded), hash matching technology does not work in the same way on Twitch. If a user rebroadcasts pre-recorded content during a livestream, the re-broadcast introduces pixel-level changes that renders existing hash-matching technology ineffective, and makes the content difficult to recognize via other automated means. We, therefore, have to invent our own solutions and adapt existing, third-party solutions to address this problem. We utilize technologies to scan live streams for harmful content in real time, including possible nudity, and we continue to invest in these proactive detection tools and evaluate opportunities to implement hash matching, as the Twitch service and products evolve.

Safety is a top priority at Twitch, and one of our largest areas of investment. Our work is never done, and we'll always be iterating on existing tools and policies, and fortifying our proactive detection and operations behind the scenes.

Sincerely,

Olaf Cramme VP, Global Public Policy