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CAROLYN WEST, PH.D. Professor, Clinical Psychology, University of Washington April 3, 2024

Mr. Daniel Ek Co-founder and CEO, Spotify 4 World Trade Center 150 Greenwich Street, 62nd Floor New York, NY 10007

## Re: Spotify named to 2024 Dirty Dozen List for facilitating sexual abuse and exploitation

Dear Mr. Ek:

We are writing to advise that the National Center on Sexual Exploitation is once again placing Spotify on the annual Dirty Dozen List. The campaign names 12 mainstream contributors to sexual exploitation and abuse and will be publicly released on Wednesday, April 10, 2024.

# Spotify has failed to address the significant and widespread harms that have existed on your platform for more than a decade. Spotify's lack of effective explicit content filtering detection and

Spotify's lack of effective explicit content filtering, detection, and moderation systems, together with insufficient reporting features, creates an unsafe, potentially harmful environment for users, particularly minors. By neglecting to address these critical issues, Spotify has enabled the dissemination of harmful and exploitative material, putting its users at risk.

When NCOSE initially began investigating Spotify last year for the 2023 Dirty Dozen List, we were taken aback by the widespread presence of hardcore pornography and sexual exploitation on this popular streaming app. <sup>1</sup> It was around the same time that your platform was in the news cycle due to a high-profile case of a young girl who was groomed and exploited through your platform when predators used playlist titles as a form of "chat," asking the child to upload sexually explicit material of herself as Spotify thumbnails.<sup>2</sup>

Our staff was hopeful that Spotify would take swift remedial action. We were hopeful that these issues were unintentional oversights by a reputable corporation that surely cared about its young users – and at the very least would not want its brand associated with these grave harms.

1201 F St. NW, Suite 200, Washington, DC 20004 | 202.393.7245 | EndSexualExploitation.org | public@ncose.com

Regrettably, Spotify has not only neglected to implement substantial measures to tackle sexual exploitation on its platform in the last year, but evidence suggests a significant escalation of harms.

NCOSE has discovered a network of individuals, including minors and adults, involved in exchanging, sharing, and seeking explicit content such as hardcore pornography (some of which contained content too graphically violent and sadistic for NCOSE to describe), child sexual abuse material (CSAM), deepfake pornography featuring female celebrities, and even self-harm imagery. Our researchers came across this network toward the end of our research period. We have neither the resources, nor capacity to delve into this further at this time. We urge you to do your due diligence in immediately investigating this network and potential other similar networks. In the meantime, NCOSE will seek to obtain additional resources – including engaging external stakeholders – to investigate these networks more closely in the near future.

We acknowledge that Spotify <u>updated its policies</u> in October 2023 to prohibit "repeatedly targeting a minor to shame or intimidate" and "sharing or re-sharing non-consensual intimate content, as well as threats to distribute or expose such content." Unfortunately, mere words on paper are meaningless without enforcement. It seems evident that your company is not effectively enforcing its policies, contributing to a rise in harmful incidents. Further in the letter, we share evidence of "non-consensual intimate content" (the more apt term is image-based sexual abuse) that we found on your platform.

Despite claims to <u>prohibit sexually explicit content</u>, <sup>4</sup> Spotify continues to host pornographic thumbnails, audio pornography, and video podcasts containing explicit material, easily accessible to all users. We provided extensive evidence of this in our May 2023 letter. We have seen no improvements.

In fact, in February 2024, Spotify launched a new category of audiobooks, "Spicy Audiobooks," and introduced the *Spice Meter* – a brand new feature that categorizes audiobooks "spiciness" level, and allows users (including kids) to choose from sexually suggestive pieces to pornographic audiobooks "with nothing left to the imagination." This suggests Spotify's policies are too vaguely defined and/or poorly enforced.

Despite Spotify's assurance that its platform is suitable for listeners <u>aged 13 and above</u>, <sup>6</sup> **sexually explicit content remains readily accessible and suggested to all users**. And even when families can afford parental controls by paying for a premium family subscription, content filters rarely work. Spotify is deceiving thousands of parents into thinking they are protecting their children, when in fact you are creating a false sense of security, which can be even more dangerous as parents believe they do not have to monitor activity as closely.

Yet despite all these harms, Spotify *still* lacks a simple method to report these offenses and harms, which is a widely accepted industry standard that could potentially protect the lives of children.

As we did last year – and is standard practice for the Dirty Dozen List – we are providing evidence of our findings for your review below. This letter, as well as additional collected screenshots, will be made publicly available on our website and shared with other stakeholders. We have blocked out sexually explicit content – a courtesy to you that you do not afford your users. *Please note: all the evidence was collected by an account created as a 14-vear-old with the filters ON*.

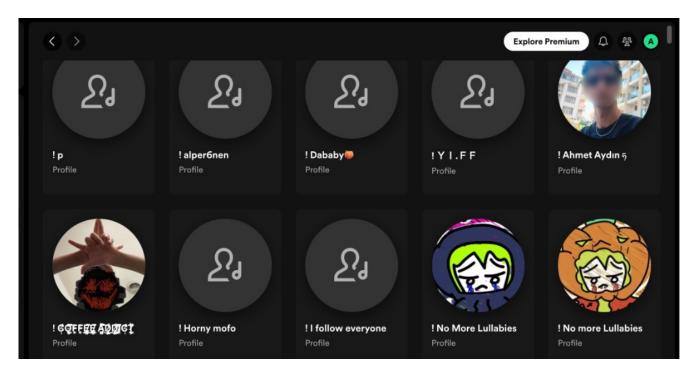
## We request Spotify take immediate action to eliminate exploitation, specifically:

- 1. Implement detection technology to proactively detect violative imagery content, grooming, and child sexual exploitation and promptly remove all users who engage in this behavior and all content used in grooming cases.
- 2. Develop reporting category for child sexual exploitation and CSAM and make reporting procedures for **ALL** content (album covers, podcasts, podcast videos, transcripts, titles, canvas, etc.) easily accessible from both the mobile and desktop apps.
- 3. Implement a strict explicit content filter: block for minors, blur for adults. Only caregivers can adjust settings, applying to all content types on the platform.
- 4. Default all video content to OFF for minor-aged accounts and have it locked under parental controls.

The following sections provide evidence of sexual exploitation on Spotify.

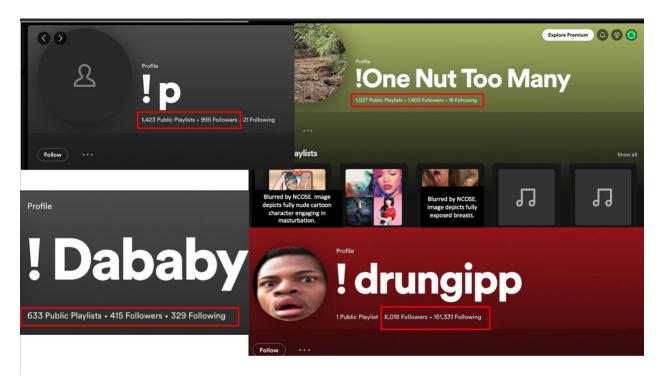
### **CSAM-Sharing Networks and Grooming of Children**

In February 2024, just as NCOSE was completing its research on Spotify, one of the researchers searched "!" and stumbled upon hundreds of accounts and harbored playlists within what was clearly an organized network dedicated to the soliciting and/or sharing of sexually explicit imagery of adults and minors. *Notice the "!" in the account names below.* 

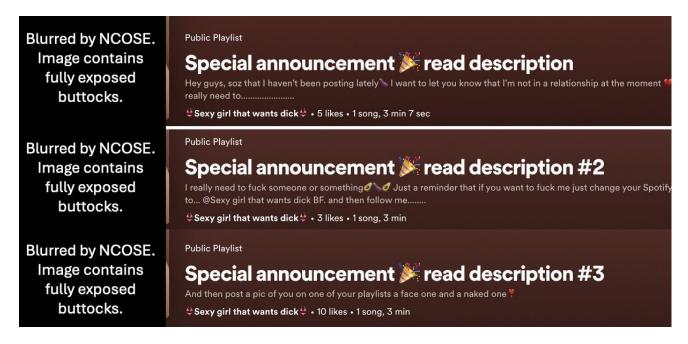


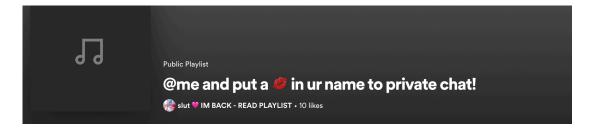
This network, often marked by specific emojis, punctuation, symbols, and descriptive keywords in user profiles and bios, appears to reach thousands of individuals (based on the follower/following numbers on the accounts) – many with similar, suspicious profile characteristics.

NCOSE found that profiles with an "!" were representative of just one entry point into this community. Notably, not all users within the network contained profiles starting with "!" as users frequently changed their names and biographies during interactions with other community members.



Users would add a description to their profile or playlist saying something like "@me in a playlist or your profile and then follow me" or "add [sexual connotation emoji] and @ me in your playlist or profile to private chat." Some users were more direct with their requests: "change your name to [the requesting user's name] and post a picture of yourself naked and clothed."

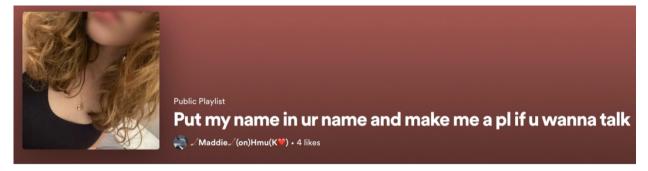




When a user wanted to interact with another user, they would make a playlist and write a description asking interested users to make a playlist by tagging the requesting user's name and adding a photo to the playlist cover art symbolizing their desire to private chat.

The first two images below show high indicators of being minor-aged accounts.





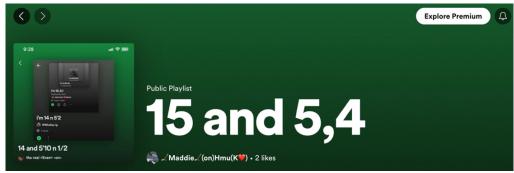
Accounts would also make playlists called "about me," or post bios containing information like the user's age, height, interests, etc.



Account is believed to be an adult posing as a minor.



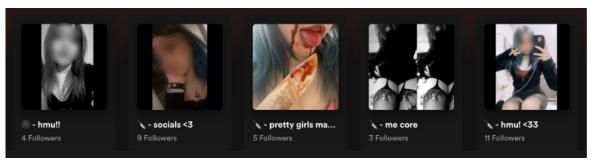
Account likely that of a minor.

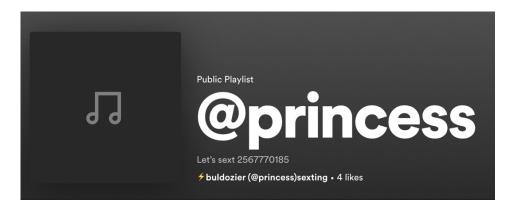


Account likely that of a minor.

Users also embedded Instagram, Snapchat, and Discord profiles within their Spotify profile descriptions and bios as a way to send others to more "private" platforms to continue their activity. Some users even embedded their email address or phone number followed by a sentence asking other users to tag them in their playlists and vice versa, to either ask for or send sexually explicit imagery of themselves or others.

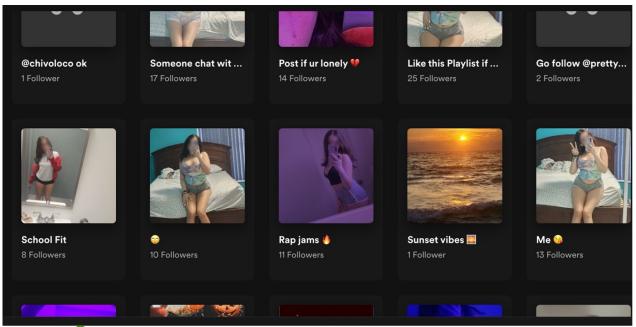






We were able to connect some of the interactions occurring between what we assumed were minor-aged users and adults, about trading sexually explicit images. NCOSE has many more screenshots of minors exchanging images with adults and other minors available by request.

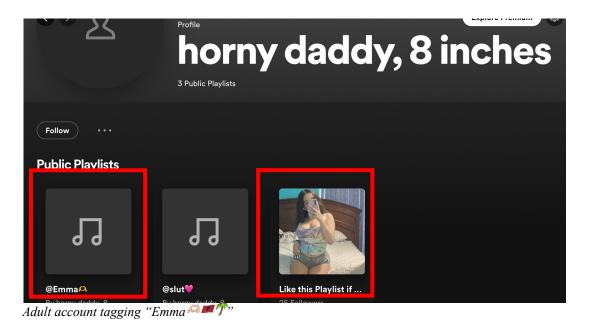
Users appearing to be minors, such as "Emma "" would post playlists containing sexualized images of themselves as the cover art and ask users to tag them if they wanted to private chat. Minors would then receive responses from accounts appearing to be adults asking to "trade" or "private chat" or sometimes even "sext."



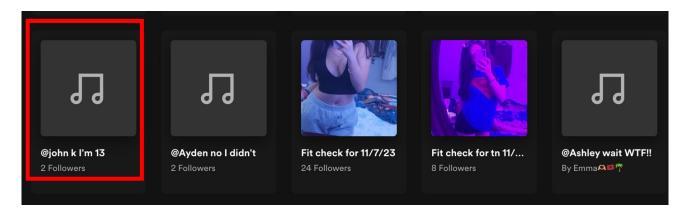
"Emma "F's" Account



Adult account tagging "Emma """



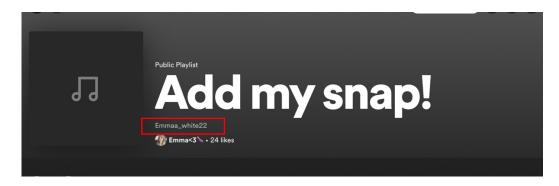
"Emma even informed potential predatory adult accounts that she was underage."



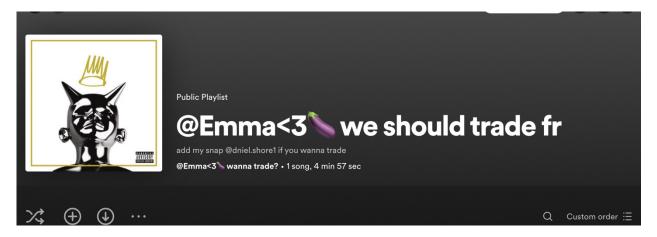
Other accounts appeared to be posing as minor-aged females to solicit sexually explicit imagery from teenage boys and girls, such as the interaction depicted below from another user named "Emma<3"."



"Emma<3\" posted her Snapchat account for users to add her.



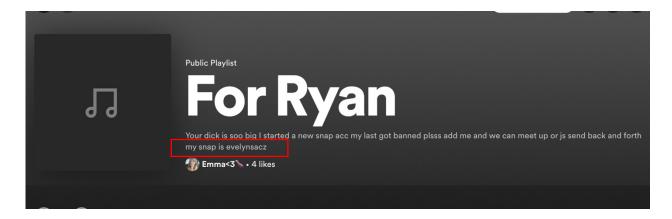
What appeared to be identifiable teenage accounts would then tag "Emma<3\infty" in their playlists asking to trade pictures with her.



The following account posted what could potentially be CSAM when tagging "Emma<3\infty" is account in a new playlist. NCOSE reported the playlist cover art in question to NCMEC. To demonstrate the age of the teenager interacting with the suspected predatory adult, NCOSE included a screenshot of his profile picture.

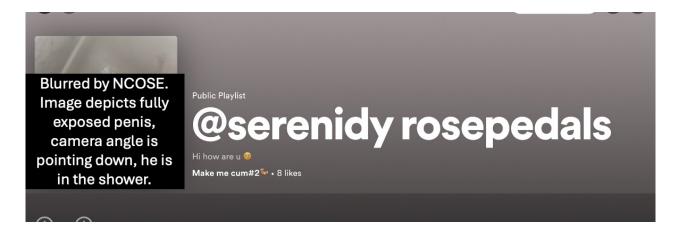


"Emma<3" would respond to the playlists by creating another playlist and commenting on the size of teenagers' penises. The example depicted below is one of a few cases in which "Emma<3" was giving compliments to various teenage boy accounts and simultaneously requesting further interactions with them offline. Notice her Snapchat account is different from her original Snapchat account depicted above.

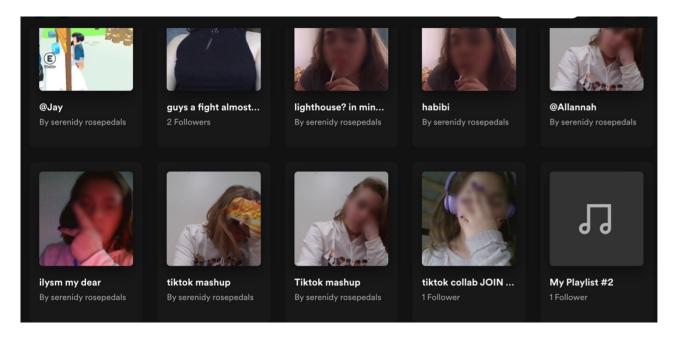


NCOSE also found examples of adult accounts tagging minors in playlists containing sexually explicit cover art (often of themselves) without having any prior interactions with the minor tagged.

For example, in the image below, an adult account, "Make me cum #2 "," tagged a minor in a playlist that featured a picture of his penis completely exposed – implying he wanted that minor to send him images of herself. This particular user had dozens of playlists with similar images and contexts tagging both adult and minor accounts.

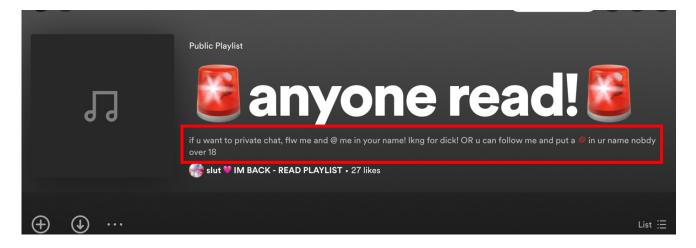


The image below is the minor who "Make me cum #2 " tagged in his playlist.



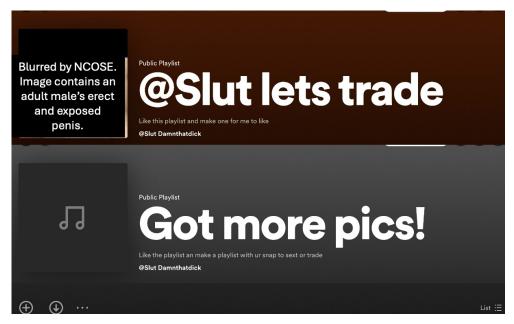
Other times NCOSE found that accounts would openly request to trade sexually explicit images of minors.

For example, the account below, "slut "" asked interested users to tag them ["slut ""] in their profile name or playlist and add the 'smooth' emoji, specifically requiring "nobody over 18."



Below are some of the responses "slut "" received or requested.



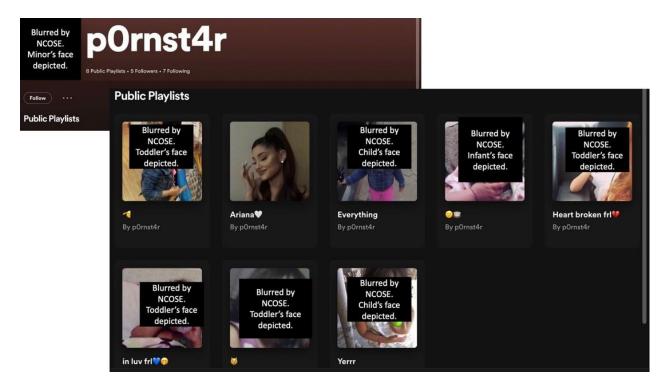


Also existing within this network, NCOSE found content which strongly suggested that actual child sexual abuse was involved.

One of the users in the network posted an image of a minor-aged girl in a swimsuit as the playlist cover. The user stated that the girl in the picture was five years old, indicating their potential fetish for or current possession of child sexual abuse material (CSAM).



Further, the search "p0rn" returned a profile called "p0rnst4r" in which the playlist cover art depicted infant, toddler, and prepubescent children. This profile was also within the network NCOSE identified, suggesting the user's potential involvement in or promotion of child sexual abuse—specifically the sexual abuse of infants and toddlers.



## Inadequate "Explicit Content" Filter Exposes Children (and Adults) to Pornography

In May of 2023, NCOSE reported on <u>Spotify's poor enforcement of platform rules</u>.<sup>7</sup> Unfortunately, nothing has changed since then and despite its policies, such content is easily found on Spotify and is rarely even marked as explicit.

The following examples occurred using a minor-aged account with the explicit content filter ON and are results for the search terms "porn" and "p0rn."

1. Within **30 seconds** of investigating, a NCOSE researcher found **entire playlists dedicated to the hosting of album covers depicting hardcore pornography,** none of which contained any audio content within the albums.



2. NCOSE researchers found a profile titled, "Extreme Porn Provider," which was one of the first things Spotify suggested to this 14-year-old account after searching "porn." The number of playlists containing cover art with images of physical and sexual abuse – including what we would consider "torture pornography" – was appalling.

NOTE: NCOSE is choosing not to describe the images in the public letter because describing what was hosted on your site is too sadistic and graphic. If you'd like evidence of what we collected, we'll be happy to provide it.

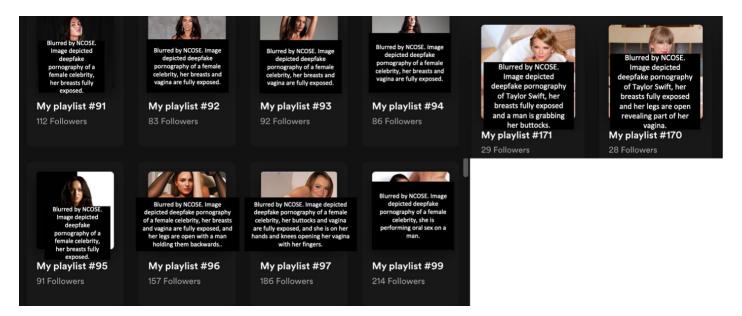
3. Results for the search "porn" also suggested NCOSE researchers to an account, "Jurnol," that apparently was part of the exploitative network NCOSE identified above, containing sexually explicit anime videos promoting and normalizing prostitution and misogyny.

The image below contains two clips in which the character is engaging in sex acts with multiple men while saying, "If somebody told me yesterday that I'd be getting paid to satisfy men's sexual urges, I never would have believed them." At the end of the video, the very young-looking female character is covered in ejaculate.



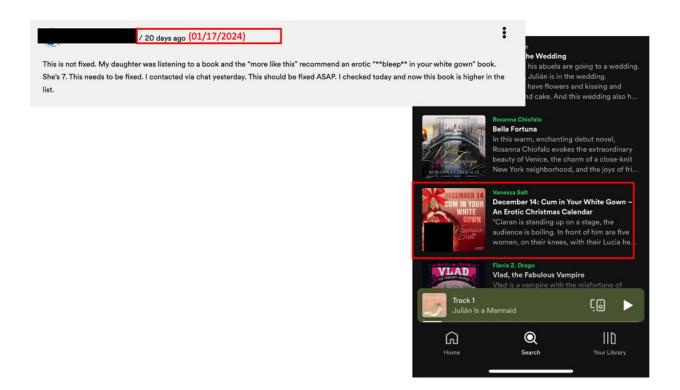


4. Despite having a <u>specific policy</u> banning harmful synthetic and manipulated media, <sup>8</sup> deepfake pornography of celebrities and hardcore pornography are also easy to find through the search "porn." Clearly, this policy is *NOT* being enforced.

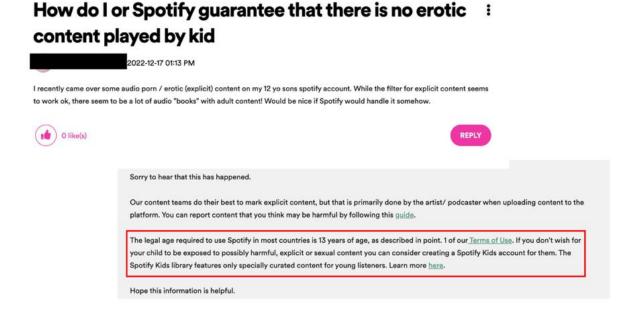


As you can see, Spotify's filter **does not work.** The search "porn" using a minor-aged account with the explicit content filter ON not only allowed minors to access hardcore, torture, and deepfake pornography, but it *suggested these accounts and content to them*.

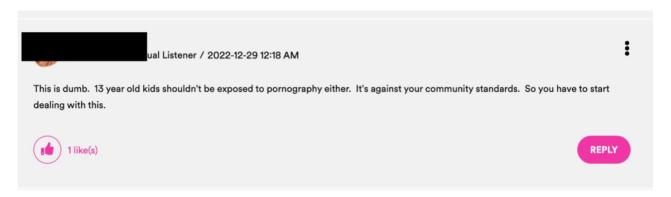
Here is more evidence of Spotify's failure and failing algorithms: A child listens to "Julian at the Wedding" – 'a joyful story of friendship and individuality.' Spotify suggests in 'up next': "December 14: Cum in Your White Gown – An Erotic Christmas Calendar."



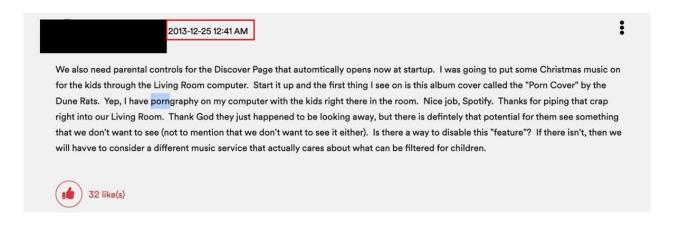
Spotify's inaction on user reports of unwarranted exposure to sexually explicit and hardcore pornographic content is inexcusable. Particularly concerning is your refusal to prevent this exposure from occurring to minors. Parents have been frequently reporting (for over a decade!) that they are unable to report or remove explicit album covers and video content being suggested to their children. Spotify's response routinely lacks empathy and urgency even when the platform is exposing minors to pornography.



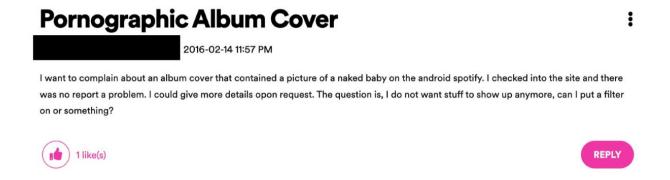
Another user's response to Spotify's answer to the concerned parent perfectly sums up the problem.



For example, here is what a concerned parent reported to Spotify over a decade ago in 2013:



And again in 2016...



These are a sampling of *MANY* reports exposing Spotify's negligence over the last decade.

Given the gravity of the situation, Spotify's default settings, which make it easy for explicit content to be accessed, particularly by minors, demonstrate an apparent neglect for the well-being of its users. This circumstance is undeniably harmful and demands prompt action to protect young and vulnerable individuals from the risks of sexual exploitation and the associated trauma. It took Spotify eight years to

<u>implement 'parental controls'</u> – Spotify Kids and parental controls over the explicit content filter for Premium Family Plan subscribers.<sup>9</sup> It is imperative that you not wait another eight years to take these issues seriously.

## Lack of Clear, Accessible Reporting Procedures

As of February 2024, Spotify still lacks a *direct, in-app reporting* option – and the reporting options that do exists are grossly inadequate and incomplete.

In May 2023, NCOSE researchers <u>revealed Spotify's inadequate reporting features</u> after discovering what appeared to be CSAM on Spotify – but were left without recourse for reporting it to the platform.<sup>10</sup> What ensued was an incredibly confusing experience that is likely to be experienced by an average user attempting to report child sexual exploitation.

Unfortunately, in August 2023, another NCOSE researcher, who had created a new minor-aged account the same day, was exposed to suspected CSAM within 10 minutes of beginning their investigation after typing in "nude" on Spotify. The suspected child sexual abuse material (CSAM) was depicted on an album cover from a *verified* artist titled 'Nudez'. The album cover depicting what appeared to be illegal imagery had been on Spotify since December 22, 2019, and as of February 16, 2024, has yet to be removed from your platform.

While our researchers immediately made a report to NCMEC's CyberTipline, because Spotify does not provide the option to report album covers on its mobile app, desktop app, or web browser, *our* researchers could not report the suspected CSAM to Spotify directly.

When NCOSE researchers attempted to report the network identified on February 6, 2024, researchers were continuously exposed to the suspected CSAM because of the complicated and lengthy reporting process you implemented.

Here is an overview of the NCOSE researchers' reporting experience:

- 1. Right click on playlist cover, scroll, and click the "Report" option.
- 2. Researchers were redirected to a webpage titled "Report Content on Spotify" where none of the options matched the description of the content being reported CSAM.
- 3. After clicking "sexual content" researchers were asked to verify their email address, and type in the verification code sent to their email.
- 4. Then, researchers were asked to choose between three options for "What do you want to report" and they chose "Playlist image."
- 5. Researchers could not offer any extra information or details about the image or scenario they were attempting to report.
- 6. Researchers sent a detailed report to NCMEC.
- 7. \*Repeat steps 1-5 for each playlist cover art depicting suspected CSAM\*

How can Spotify not allow users to report album covers on any device despite album covers being editable, user-generated, user-controlled, and able to be uploaded by multiple people if they are shared albums?

Below are the types of content and categories *missing* from existing Spotify reporting options:

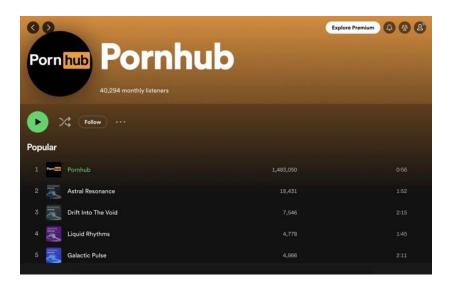
- Child sexual abuse material (CSAM) and child sexual exploitation
- Album cover art that may include hardcore pornography, genitalia, etc.
- Text in profile or playlist descriptions (how sexual grooming and CSAM sharing occurs)
- Podcasts (audio, video, text, etc.)
- Songs

Although Spotify claims to report CSAM to NCMEC's Cyber Tipline, in 2022, Spotify was named as one of 36 ESPs with more than 90% of reports lacking actionable information – meaning that out of Spotify's 213 reports to NCMEC in 2022, only about 22 were actionable.<sup>11</sup>

Spotify's lack of a response to these abhorrent child sexual exploitation cases has been insubstantial and severely lacking in urgency. The delay in the removal of explicit content and the lack of action against sexual grooming is unacceptable and is literally putting kids and leaving kids in situations of sexual abuse. Shame on you, Spotify.

## **Removing Pornhub's Account**

When a NCOSE researcher typed in "porn" **an account for Pornhub appeared** – with more than 42,000 monthly listeners and one song played over 1.4 million times. The songs on the account, often under innocuous titles, are the intro music or background sounds of pornography videos on their website.



The very existence of Pornhub on social media platforms normalizes and even glamorizes this predatory enterprise that survivors and investigative journalists have exposed <sup>12</sup>— and which has been sued by victims in at least 5 lawsuits — for hosting child sexual abuse material, sex trafficking, filmed rape, and a host of other crimes. <sup>13</sup>

Pornhub and other pornography sites rely on mainstream companies and brands to keep them in business and grow their user base. Spotify's hosting of Pornhub's account and permissive attitude toward

pornography and sexually explicit content serves as both a distribution channel and an implicit form of advertising and acceptance for this type of content.

Pornhub has come under fire for hosting and profiting from child sexual abuse material (CSAM) and other non-consensual material. The company has been removed from mainstream social media platforms such as <u>YouTube</u>, <u>Instagram</u>, <u>and TikTok</u>. <sup>14</sup> Although pornography was not hosted on Pornhub's accounts on these platforms, these companies recognized that by giving Pornhub any platform at all, they were supporting a criminal enterprise. NCOSE urges Spotify to follow its <u>own policies</u> and the example of other companies by banning Pornhub's account. <sup>15</sup> Spotify, you have *a lot* of work ahead of you.

The gravity of this issue cannot be overstated – it is a matter of fundamental human rights, the rights of children and adults, that Spotify has undermined by failing to provide a safe virtual environment. There are no more excuses for inaction. You have been put on notice multiple times. And in an environment where the exponentially increasing online harms to kids have even unified all political parties in Congress, we hope Spotify will decide to be on the right side of history. Please prioritize child protection over your profit margins.

Our invitation from last May to meet with your team to share our concerns and develop solutions remains open.

Thank you for your attention,

Daur-Hauturs Kindsey P. Chadwick

Dawn Hawkins Kindsey P. Chadwick

CEO Interim President

Cc:

Alex Norström, Co-President and Chief Business Officer

Gustav Söderström, Co-President and Chief Product & Technology Officer

Eve Konstan, General Counsel

Attached: 2023 Dirty Dozen List Notification Letter to Spotify

<sup>&</sup>lt;sup>1</sup> NCOSE, "Spotify Notification Letter Dirty Dozen List 2023," April 28, 2023, <a href="https://endsexualexploitation.org/wp-content/uploads/Spotify-Notification-Letter">https://endsexualexploitation.org/wp-content/uploads/Spotify-Notification-Letter</a> DDL-2023 FINAL REDACTED.pdf.

<sup>&</sup>lt;sup>2</sup> Danya Bazaraa, "Warning Over 'Sickening' Sexual Grooming on Spotify as Mother Reveals How Her 11-Year-Old Daughter was Tricked Into Uploading Explicit Pictures by Paedophiles," *Daily Mail*, January 6, 2023,

 $\underline{https://www.dailymail.co.uk/news/article-11606383/Warning-mother-says-11-year-old-daughter-tricked-uploading-explicit-photos-Spotify.html.}$ 

- <sup>3</sup> "Spotify Platform Rules," Spotify, accessed March 5, 2024, <a href="https://support.spotify.com/us/article/platform-rules">https://support.spotify.com/us/article/platform-rules</a>.
- 4 Ibid
- <sup>5</sup> Emilie Lavinia, "Spotify has Released a Collection of Sexy Audiobooks for V-Day," *Cosmopolitan*, February 9, 2024, <a href="https://www.cosmopolitan.com/uk/love-sex/sex/a46697162/spotify-has-released-collection-of-sexy-audiobooks-for-v-day.">https://www.cosmopolitan.com/uk/love-sex/sex/a46697162/spotify-has-released-collection-of-sexy-audiobooks-for-v-day.</a>
- <sup>6</sup> Spotify, *A Guide to Spotify for Parents and Guardians* (Spotify, October 2021), accessed March 5, 2024, https://www.spotify.com/privacy/files/Parental Guide.pdf.
- <sup>7</sup> "Spotify Platform Rules," ibid.
- <sup>8</sup> Ibid.
- <sup>9</sup> "[All Platforms] Parental Controls," Spotify Community, Status Update, last modified September 14, 2020, <a href="https://community.spotify.com/t5/Implemented-Ideas/All-Platforms-Parental-Controls/idi-p/229160">https://community.spotify.com/t5/Implemented-Ideas/All-Platforms-Parental-Controls/idi-p/229160</a>.
- <sup>10</sup> NCOSE, "Spotify Notification Letter," ibid.
- <sup>11</sup> National Center for Missing & Exploited Children, "Cyber Tipline 2022 Report," May 2023, accessed March 5, 2024, <a href="https://www.missingkids.org/cybertiplinedata">https://www.missingkids.org/cybertiplinedata</a>.
- <sup>12</sup> Nicholas Kristof, "The Children of Pornhub," *The New York Times*, December 4, 2020, https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html.
- <sup>13</sup> National Center on Sexual Exploitation, "The Real Pornhub Story," accessed April 24, 2023, <a href="https://endsexualexploitation.org/pornhub">https://endsexualexploitation.org/pornhub</a>.
- <sup>14</sup> Lina Nealon, "Pornhub Just Got Kicked off Instagram, YouTube, and TikTok Here's Why," *National Center on Sexual Exploitation*, December 20, 2022, <a href="https://endsexualexploitation.org/articles/pornhub-just-got-kicked-off-instagram-youtube-and-tiktok-heres-">https://endsexualexploitation.org/articles/pornhub-just-got-kicked-off-instagram-youtube-and-tiktok-heres-</a>
- $\frac{why/?sm\_guid=Njg0MTYxfDc4MDEyMzc1fC0xfGxtb3JpY0BuY29zZS5jb218NjU3MTIzN3x8MHwwfDE5MDcwMzYzN3wxMTMyfDB8MHx8Njc3ODIyfDA1.}{}$
- <sup>15</sup> "Spotify Platform Rules," ibid.



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Former Associate Chief Justice, Utah Supreme Court

April 28, 2023

Daniel Ek Co-Founder and CEO, Spotify 4 World Trade Center 150 Greenwich Street, 62nd Floor New York, NY 10007

## Re: Spotify named to 2023 Dirty Dozen List for facilitating sexual exploitation

Dear Mr. Ek,

We are writing to inform you that the National Center on Sexual Exploitation—a non-partisan nonprofit organization in Washington, DC dedicated to addressing the full spectrum of sexual exploitation is placing Spotify on the annual Dirty Dozen List – a campaign that names 12 mainstream contributors to sexual exploitation and abuse. This year's Dirty Dozen List will be revealed on Tuesday, May 2, 2023.

Multiple child safety advocates and parents have also been elevating the problematic content on Spotify for years. Just in the past few months:

- Survivor-advocate and influencer Catie Reay released a TikTok urgently warning parents and minors about sexual grooming on Spotify and calling on your company to address the problems<sup>1</sup>
- Bark, a leading resource for online child safety, warned parents of the "large selection of pornographic content" on Spotify which was easily discoverable and frequently missed by Spotify's explicit content filter<sup>2</sup>
- Leading child online safety expert Chris McKenna at Protect  $\Rightarrow$ Young Eyes attested to receiving "multiple messages from parents about Spotify's explicit content weaknesses" and explained how innocent searches for children's music led to being "inundated with raunchy content"3
- The story of an 11-year-old girl being groomed by a predator on Spotify made headlines on multiple mainstream news outlets such as the DailyMail<sup>4</sup> and the BBC.<sup>5</sup> In light of this incident, a Stockport

MP called on the UK government to expand the scope of its Online Safety Bill to include streaming platforms like Spotify.<sup>6</sup>

Families have been asking NCOSE with increasing frequency to look into the ease with which their children can access visual, written, and audio pornography on Spotify. And a significant number of caregivers leaving Spotify reviews on Common Sense Media have shared stories about their children's exposure to harmful content and frustration at what they perceive to be inadequate and deceptive content controls.<sup>7</sup>

Having conducted our own research and pressure-tested Spotify's policies and safety tools, NCOSE has concluded that much more proactive enforcement and moderation of prohibited content is required, along with improved filtering options. Further, we were dismayed at the lack of clear, accessible reporting procedures for child sexual exploitation, especially considering the recent mainstream news coverage of an 11-year-old girl being exploited on your platform.

We warmly thank Spotify for its industry-leading move in creating a "Spotify for Kids," which we think is indeed well designed and moderated. However, serious problems remain with the main Spotify app, which you still market to children. Spotify's guide for parents and guardians states, "We have designed Spotify to be appropriate for listeners 13+ years of age." Unfortunately, Spotify's practices don't live up to that promise. And it is because Spotify is expected to be a safe platform that it is named to the 2023 Dirty Dozen List—which educates on harm that is facilitated by mainstream companies people may not expect.

We ask you to consider our recommended changes for improving the safety of your platform, explained throughout this letter, and we welcome further discussion of these issues. Our key requests for improved safety on Spotify are as follows:

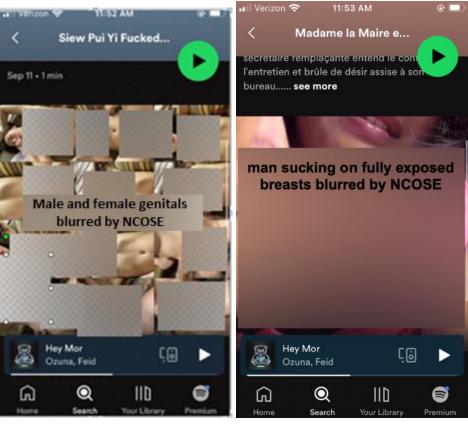
- 1. Improve measures to proactively detect and remove prohibited content
- 2. Improve measures to proactively detect grooming and child sexual exploitation and promptly remove all users who engage in this behavior and all content used in grooming cases
- 3. **Implement a reporting category for child sexual exploitation** and make reporting procedures easily accessible from both the mobile and desktop apps, for all types of content
- 4. Improve measures to proactively detect and filter any content which is inappropriate for teens; these measures should apply to all types of content, whether images (including profile images), text, or audio
- 5. Develop filtering options that include different levels/age-ratings or different content categories
- 6. **Default all safety settings** and only enable caregivers to change these settings on a minor's account (including for free accounts)

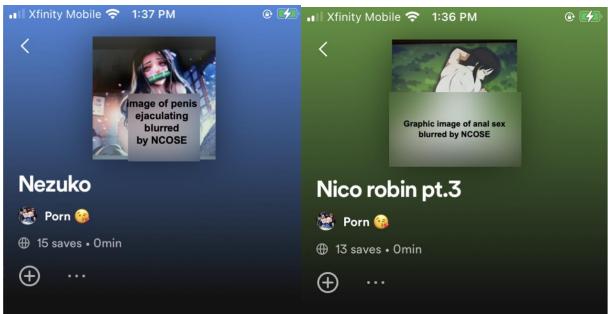
## Poor Enforcement of Spotify's Platform Rules

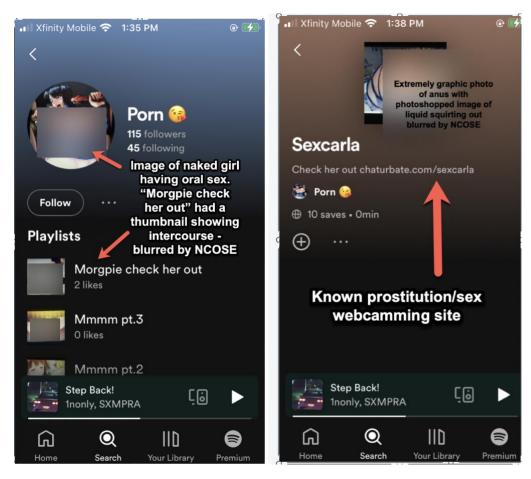
<u>Spotify's Platform Rules</u> prohibit "sexually explicit content," which you say "includes but may not be limited to pornography or visual depictions of genitalia or nudity presented for the purpose of sexual gratification," as well as "advocating or glorifying sexual themes related to rape, incest, or beastiality." However, despite these policies, such content is easily found on Spotify and is rarely even marked as explicit. The following are only a few examples of prohibited content that NCOSE researchers were able to easily find on a 13-year-old account.

We have blurred all sexually explicit images, a courtesy Spotify does not offer the user.

"Pornography or visual depictions of genitalia or nudity presented for the purpose of sexual gratification."





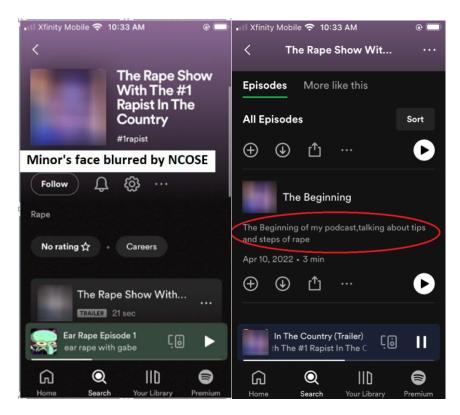


In addition to sexually explicit thumbnails, Spotify is littered with audio and written pornography (proof included later). It is not entirely clear whether Spotify's definition of "pornography" encompasses such content. This letter proceeds under the assumption that it does not, so the matter of audio and written pornography will be addressed later on when discussing Spotify's explicit content filter. However, if Spotify's sexually explicit content ban *does* extend to audio and written content, then we urge much stronger enforcement to proactively detect and remove this material.

## "Advocating or glorifying sexual themes related to rape, incest, or bestiality."

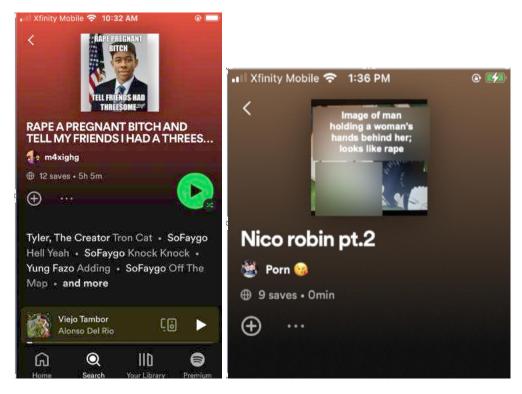
NCOSE researchers were deeply disturbed by the horrific content we found easily on Spotify which normalized, trivialized, and even encouraged rape. This content was easy to find, and we even stumbled on it by searching innocuous terms like "rap" and "boy."

For example, we found a podcast called "The Rape Show With The #1 Rapist In The Country," which included tips on how to commit rape and how not to get caught by the authorities.

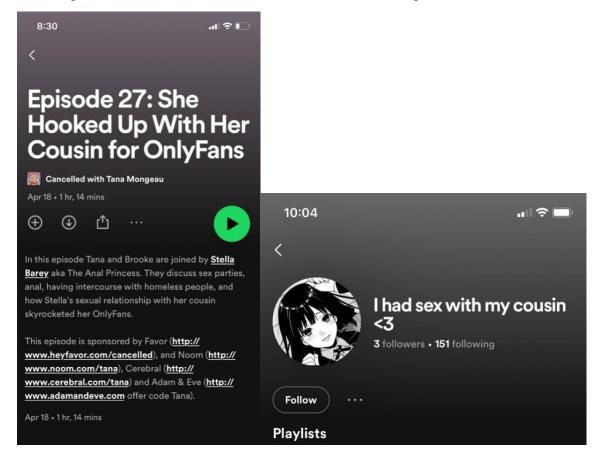


The voice in the podcast is of a young child. It is possible that the podcast may be a "joke," but it is the furthest thing from funny.

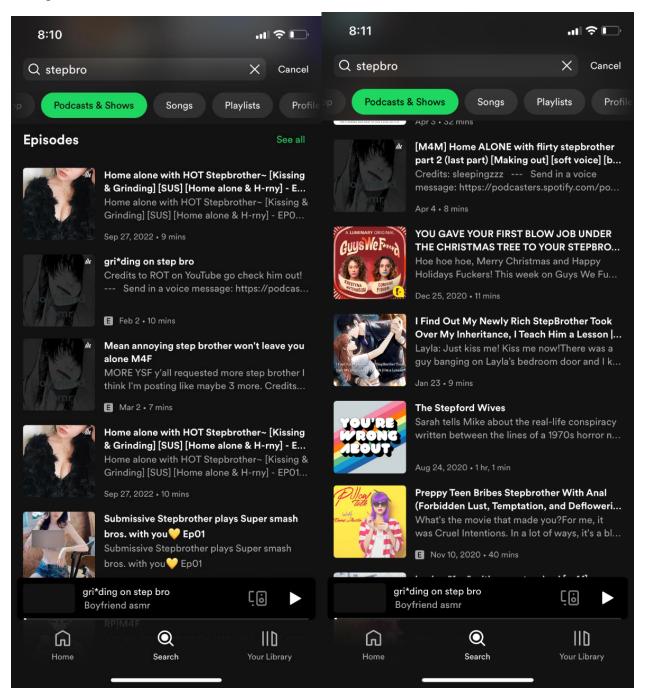
Further content normalizing or trivializing rape is shown below. The first image surfaced in a search for "rap," indicating how easy it is to come across this horrific content. Imagine being a kid stumbling on this content while looking for rap music, or a rape survivor looking for healing podcasts and being subsequently re-traumatized by the material below.

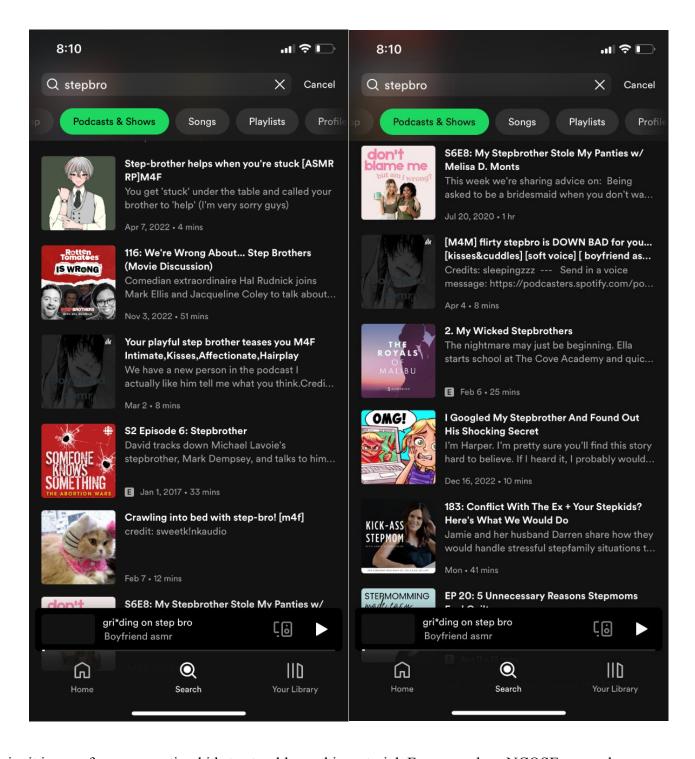


With respect to normalization of incest, below are a few examples of content NCOSE researchers found.

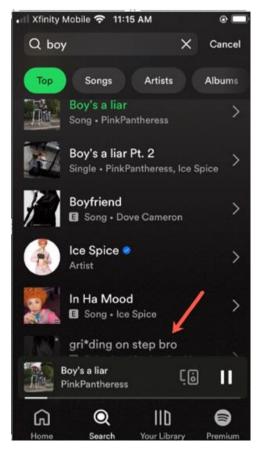


We also very easily found content on Spotify that participated in a trend of "step" incest, which has been normalized by pornography. A search for "stepbro" instantly pulls up an abundance of such content to scroll through.





Again, it is easy for unsuspecting kids to stumble on this material. For example, a NCOSE researcher was intending to search the song "Boy's a liar," which is very popular with teens. They only needed to type the word "boy" to be led to step- incest in the results. This was done on a newly made account for a 13-year-old, so search history was not yet affecting results.



"Content that promotes, solicits, or facilitates child sexual abuse or exploitation."

Under its policies on <u>"Dangerous Content,"</u> Spotify also prohibits "content that promotes, solicits, or facilitates child sexual abuse or exploitation." <sup>10</sup>

Unfortunately, when a NCOSE researcher searched for "porn" on Spotify, one of the first results was an audio pornography podcast for which the thumbnail was a topless girl on a bed who was almost certainly underage. This content was reported to the National Center for Missing and Exploited Children (NCMEC) and the Canadian Center for Child Protection (C3P). NCOSE also reported the content to Spotify, at which point we found that the process for reporting child sexual exploitation on Spotify was incredibly inaccessible and confusing for the average user (discussed in more detail later).

You will also be aware that a case of an 11-year-old girl being groomed and sexually exploited on Spotify recently made news headlines. Sexual predators communicated with the young girl via playlist titles and encouraged her to upload numerous sexually explicit photos of herself as the cover image of playlists she made. They also exchanged emails via this method of communication.

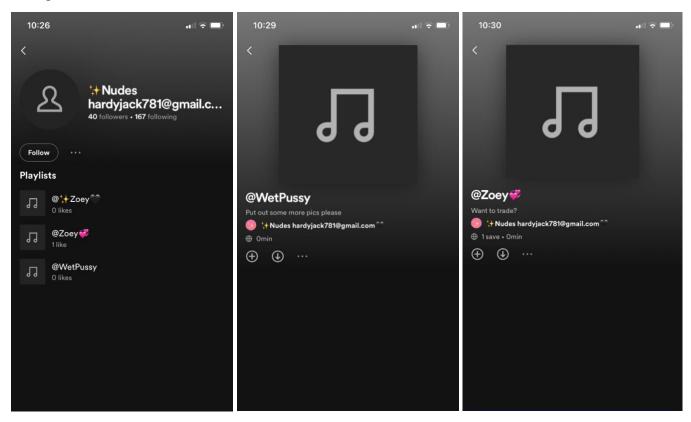
The exploitation continued for a period of six months before Spotify detected that one of the girl's playlists violated their terms and conditions. Spotify then proceeded to remove the single playlist—which we are grateful for. But numerous other child sexual abuse images of the girl remained on Spotify, to be later discovered by the girl's mother. The mother stated that she had to report the content "multiple times" before it was finally deleted by Spotify. 11

Further, it is not clear that Spotify made any effort to identify the groomers and ban them from the platform upon identifying the violating playlist.

These are insufficient responses to a matter as grave as child sexual exploitation.

Survivor-advocate <u>Catie Reay recently released a TikTok</u> showing evidence of grooming on Spotify, such as **playlists that tag other users and ask them to send sexually explicit content of themselves**. This TikTok was made at the request of one of Catie Reay's followers, whose daughter was groomed on Spotify in this way.<sup>12</sup>

NCOSE researchers very easily found several suspicious Spotify profiles which may be dedicated to the soliciting or sharing of nudes. One of the profiles shared an email address and tagged other users in playlists, asking them to send nudes.





Considering the recent case of grooming, it is concerning that Spotify is not taking more action to prevent the soliciting of nudes. We urge Spotify to improve its measures to proactively detect grooming and child sexual exploitation, and promptly ban all users who engage in such behaviors.

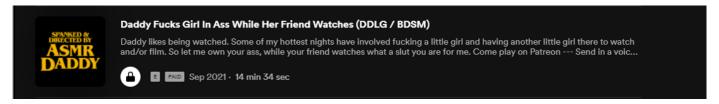
In addition to indisputable cases of real child sexual exploitation, NCOSE found a plethora of content in which it was not clear whether real child sexual abuse was involved, but which certainly normalized and fetishized child sexual abuse. We believe that, regardless of whether a real child was involved, such material still falls under this category of prohibited content; Spotify explains that the category includes "encouraging or promoting sexual attraction by adults towards minors," and we argue that this can be done through the fetishization of child sexual abuse, real or enacted. <sup>13</sup> To fantasize about/enact child sexual abuse for the purpose of arousal is to paint child sexual abuse as "sexy" and arousing.

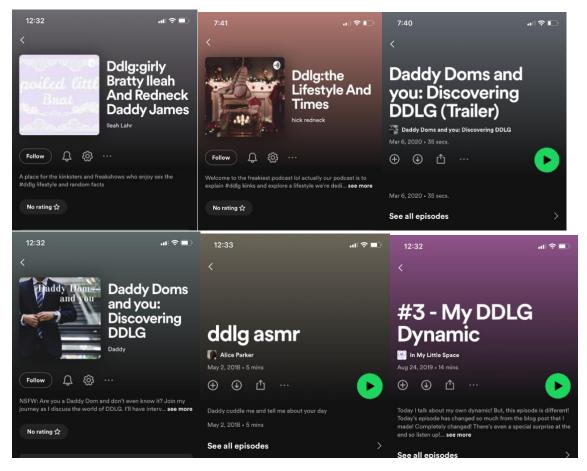
Below is an example of an audio pornography podcast NCOSE found which depicted child sexual abuse.

(translation: "He's not your son anymore! When the whole barracks attends the anal preparation of her child by her supervisor")



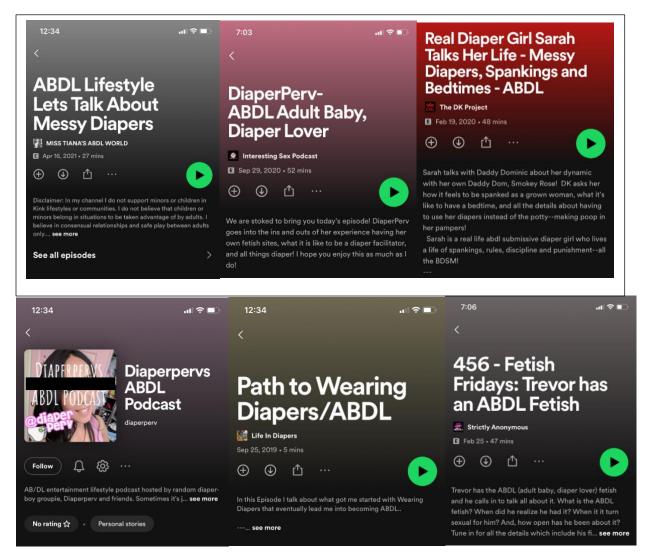
Further, we found a number of pornography podcasts labelled with the term "DDLG" (Daddy Dom Little Girl), which is well-known among sex trafficking investigators as an indicator of potential child sexual abuse material.<sup>14</sup>





We acknowledge that the term "DDLG" is also often used to refer to adults role playing child sexual abuse, in addition to real CSAM. However, again, we argue that this content still warrants being banned because of how it fetishizes and normalizes child sexual abuse. It is worth noting that **even well-known pornography websites like Pornhub and OnlyFans include the term "DDLG" in their list of banned words** (despite this list being poorly enforced). A search for "DDLG" on Pornhub will not yield results, but instead directs users to a warning that the content they're seeking may be illegal and a referral to where they can get help for sexual attraction to children.

In a similar vein, our team also found a plethora of "ABDL" (Adult Baby/Diaper Lover) content on Spotify. This is another term denoting the role playing of child sexual abuse—specifically the sexual abuse of infants



As the above evidence shows, Spotify is not doing enough to enforce its platform rules. We acknowledge that Spotify has been known to take down prohibited content in response to reports, but **given the extent of prohibited material on the platform, more needs to be done to proactively detect and prevent this content from being uploaded.** Further, there is much that Spotify can do to improve its reporting process, especially with respect to the reporting of child sexual exploitation.

## No Clear, Accessible Report Procedure for Child Sexual Exploitation

In response to the grooming scandal, a Spotify spokesperson stated:

Spotify takes the safety of minors on our platform extremely seriously, and we do not allow content that promotes, solicits, or facilitates child sexual abuse or exploitation. We have processes and technology in place that allow us to detect and remove any such exploitative material.<sup>15</sup>

Given this statement—and the fact that child sexual exploitation on Spotify has been making headlines—NCOSE was shocked to discover that Spotify does not have what would seem to be a bare minimum feature: clear, accessible reporting procedures for child sexual exploitation.

When a NCOSE researcher discovered what appeared to be CSAM on Spotify, they proceeded to attempt to report it to the platform. What ensued was an incredibly confusing experience that is likely to be experienced by an average user attempting to report child sexual exploitation.

Googling questions such as "how to report child pornography on Spotify" and "how to report child sexual exploitation on Spotify" **brought the researcher to no helpful information**. After trying many queries like this, eventually a Google search of "report content on Spotify" brought the researcher to a <u>Spotify webpage</u> with instructions on how to report "infringing, illegal, or hate content." The page specifically stated that you could report images this way. However, **upon trying out Spotify's instructions, the researcher found that they did not work.** After a long while of testing, they eventually determined that the in-app reporting feature was only available for playlists, audiobooks, artists, and profiles, but **not for podcasts, albums, and songs.** This is extremely problematic, not only because this specific case of CSAM was the thumbnail for a podcast, but because a large percentage of the concerning content we highlighted in this letter was in **podcast form.** 

Finally, NCOSE researchers found an <u>online form for reporting content on Spotify</u>—but saw that there was **no reporting category for child sexual exploitation, or even for illegal content** (this is likely the reason why users searching for "report child sexual exploitation" and the like did not turn up any helpful results – a serious barrier to users attempting to report this type of content).<sup>17</sup>

It was not clear which of the categories on the form it would be appropriate to report CSAM under. Fortunately, the researcher had previously spent time reading through Spotify's policies for this letter and consequently knew that Spotify categorized child sexual exploitation under "Dangerous Content." As such, the researcher presumed they should report under "Violent or dangerous." However, the average Spotify user trying to report child sexual exploitation would not have the advantage of previously spending multiple hours researching Spotify's policies to help them determine this.

Upon filling out the form, the researcher was utterly dismayed to find that there was **no option to write more details on the report.** As such, given that Spotify had not provided a reporting category for child sexual exploitation, **there was no way for the researcher to indicate to Spotify that they were reporting CSAM.** This information is of critical importance to Spotify, for the purpose of prioritizing reports and knowing what to look for in the content.

We urge Spotify to implement a reporting category for child sexual exploitation and to make reporting procedures easily accessible from both the mobile and desktop apps, for all types of content.

## The Inadequacy of Spotify's Explicit Content Filter

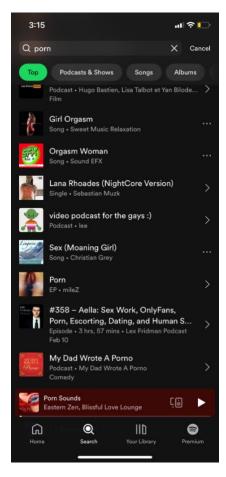
In <u>A Guide to Spotify for Parents and Guardians</u>, your company claims that "content which may not be appropriate for teens is marked with an 'Explicit Content' or 'E' label." While we thank Spotify for having an explicit content filter, upon testing the tool, NCOSE researchers very quickly found it to be extremely inadequate and inconsistent. For example, while a reasonable number of songs that contained swear words were marked explicit, the *majority* of sexually graphic content we found on Spotify (whether visual, audio, or written) was *not* marked explicit.

We understand that Spotify applies the explicit content tag based on information it receives from rights-holders. This system is clearly broken and is not coming anywhere close to meeting reasonable expectations

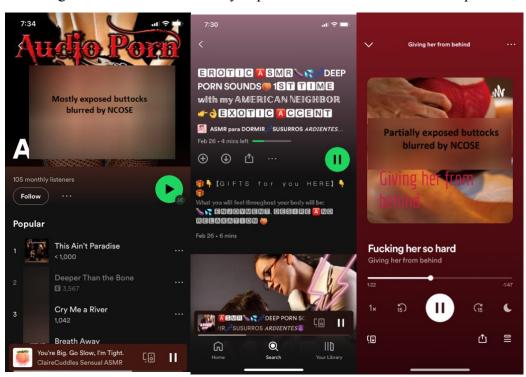
parents/caregivers would have, especially when Spotify's guide assures them the filter will block "content which may not be appropriate for teens."

Below are screenshots of NCOSE researchers scrolling through the first results after searching for the word "porn" on a newly made 13-year-old Spotify account. Notice that *only twice* in all these results is content marked explicit. Occasionally, when clicking on a pornography podcast/playlist, individual episodes or songs were marked explicit, but the majority still weren't (we invite you to test this for yourself).

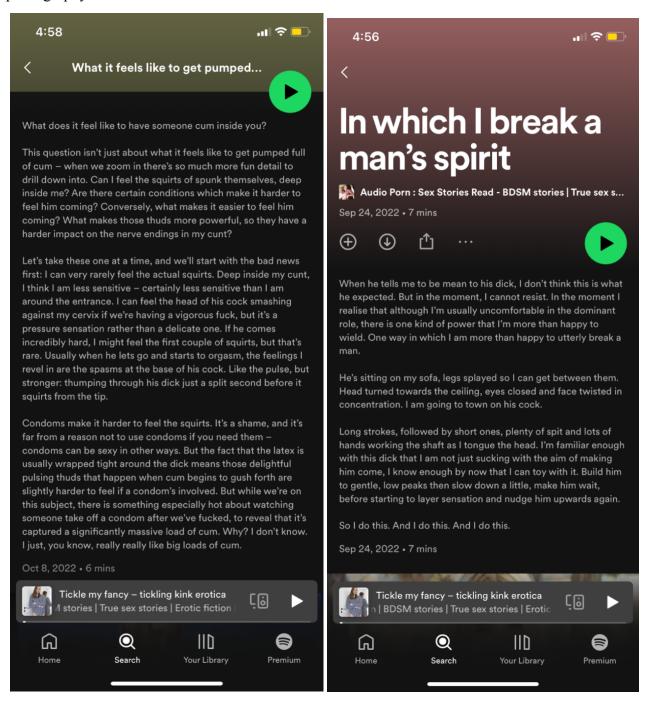


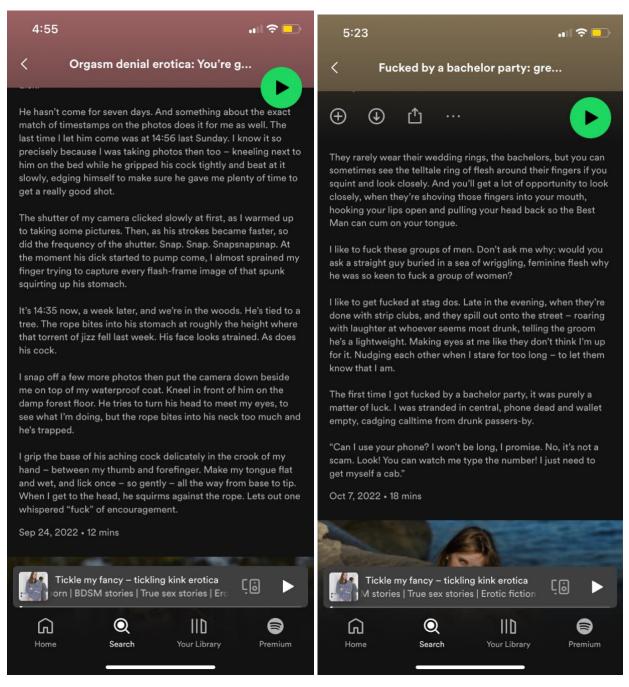


A large percentage of these results were of audio pornography which, as we have mentioned, either contain recordings of sex sounds or sexually explicit stories read aloud. A few specific examples are shown below.



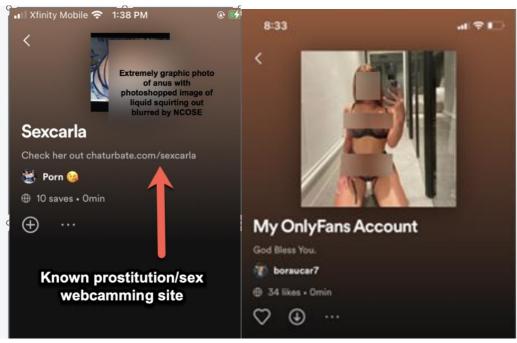
In addition to audio content, the descriptions for these results sometimes contained very graphic written pornography.

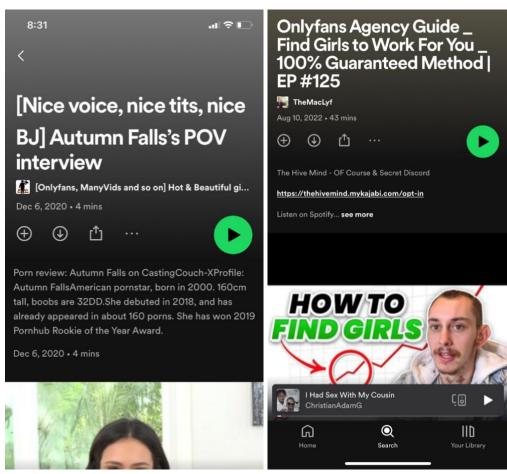


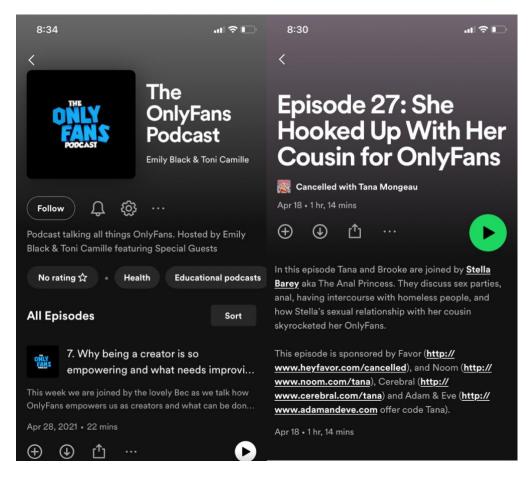


If Spotify judges that audio and written pornography should not be encompassed by the platform's sexually explicit content ban (a dubious choice), then it is absolutely imperative that such content be caught by the explicit content filter.

We also found that some of the content promoting external pornography and prostitution websites, such as OnlyFans and chatturbate.com, was not marked explicit. A filter which claims to block content that is inappropriate for teens should not be allowing promotion of pornography and prostitution websites.







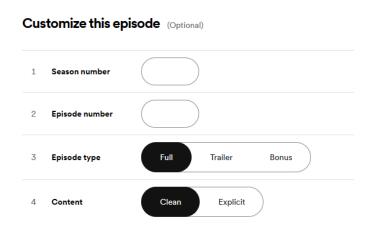
Spotify needs to do much more to proactively detect and filter content which is inappropriate for teens. These measures should apply to all types of content, whether images (including profile pictures, which is where NCOSE found much of the sexually explicit imagery), text, or audio.

We also recommend that Spotify develop filtering options that include **different levels/age-ratings or different content categories**. There is precedence for this on other social media and streaming platforms. The benefit to this approach is that it would allow parents/caregivers to protect their children from the most harmful content or the types of content they are most concerned about, without being overly restrictive for older children. For example, one parent who spoke to NCOSE expressed her frustration that Spotify **did not have an option to "block x rated podcasts if I allow my teens to listen to songs with a mild swear word like 'damn'. It's all or nothing, Spotify for a six-year-old or an adult."** Without different levels for filters, teens and their parents may become frustrated with how restrictive the current filter can be and may lift it for that reason, without realizing that this presents risk of exposure to much more egregious content.

We recognize that some of our requested changes require effort and time, so as a temporary measure, we would like to suggest some **very easy fixes that Spotify can implement immediately**:

1. **Update the explicit content filter to hide thumbnails and descriptions from view.** As demonstrated by the screenshots included throughout this letter, very often the thumbnails and descriptions are explicit or age-inappropriate themselves. When a user opts to block explicit content, the thumbnails and descriptions for all content marked with an "E" should be blurred.

2. Prevent creators and artists from uploading/distributing content on Spotify until they mark whether it is appropriate for teens. Currently, marking content as explicit or clean is an optional feature that is easily missed. One NCOSE researcher had used Spotify for Podcasters before and never even noticed that there was an option to mark the content clean or explicit, as it is at the very bottom of the page in an "optional" section.

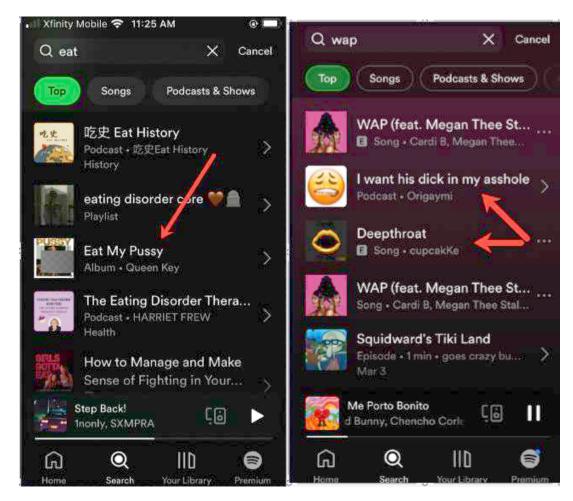


Rather than this system, users should be prevented from completing their upload/distribution to Spotify until they answer the question "Is your content appropriate for 13-year-olds?" Asking this question is more suitable than having the user select "clean" or "explicit" because, again, Spotify's guide for parents and guardians states that the explicit filter blocks "content which may not be appropriate for teens." This question should also be asked when users are uploading a profile image, as again, much of the sexually explicit imagery NCOSE found was in profile photos.

## The Importance of Defaulting to Safety

Currently, the default setting on Spotify is that explicit content is *allowed*, even for minor accounts. <u>As</u> research shows that most people leave devices and apps at their default settings, this approach puts children directly in harm's way.<sup>19</sup>

It is not difficult for children to stumble on sexually graphic content on Spotify. Recall how we previously showed a search for "rap" and "boy" led NCOSE researchers to content glorifying rape and incest. Below are a couple other examples of NCOSE researchers searching songs that are popular with teens ("Eat Your Young" and "WAP") and being served highly sexual content (in the first case, only the first word "eat" was typed before sexual content was served). Again, these results were from a newly made 13-year-old account, so results were not affected by search history.



Further, a 2022 article by Vice argues that the only reason for producers/creators of pornographic content to upload the material to Spotify is that people may stumble on their content unexpectedly:

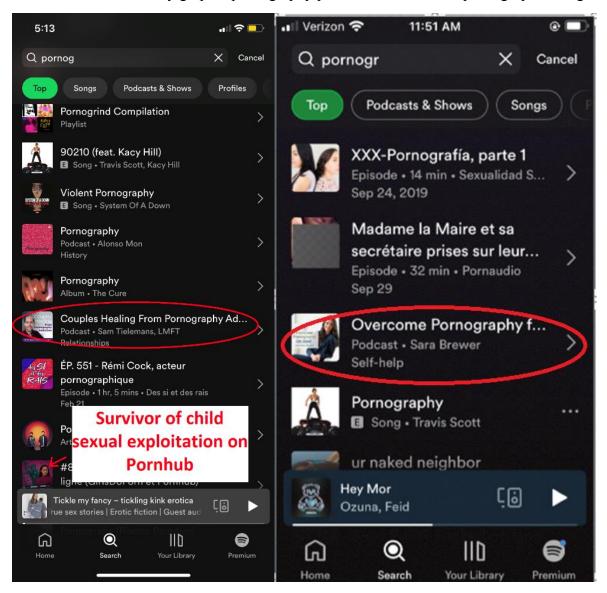
If you're a legitimate audio porn creator, there's only one compelling reason to upload your work to Spotify, where everything is free and the pay sucks ass: Visibility. Adult content that's not pushed off mainstream platforms—like how people use Twitter to market their Onlyfans—is a good thing for creators trying to be seen by adults who aren't necessarily looking for sexual content but might stumble into it.<sup>20</sup>

The above quote speaks of "adults" stumbling on this content, but there is nothing stopping it from happening to children as well.

Given all this, the result of not having safety tools on by default is that the only children who get protected are those with highly-involved, danger aware, tech savvy parents who can afford to spend hours navigating the various parental controls and safety settings on the numerous apps their child uses. The majority of children, and especially the most vulnerable (i.e., those without the privilege of involved parents), are left completely exposed to harm.

We therefore implore Spotify to activate its explicit content filter (and any other safety tools it develops) by default, at the very least on minor accounts. Preferably, this would be the default for accounts of all ages, as children have been known to regularly lie about their age when creating online accounts, and even adults

should not be bombarded with unsolicited explicit content. This is arguably a form of sexual harassment. It is also potentially triggering for survivors or people trying to overcome pornography addiction—podcasts interviewing survivors of exploitation in the porn industry and/or podcasts about overcoming pornography were often surrounded by graphic pornography podcasts that included pornographic images.



Activating the explicit content filter by default for accounts of all ages would avoid all these issues, and consenting adults who wish to see explicit content could still easily change the setting if they so choose.

It should also be the case that only a caregiver can control the explicit content settings for a minor's account. We warmly thank Spotify for providing this type of parental control through the Premium Family Subscription; however, we believe it is problematic that it is not available on free accounts. We understand that Spotify is a business and needs ways to incentivize people to purchase premium plans—but we do not believe that putting vulnerable children at risk is an acceptable business strategy. Child protections on a 13+ platform should not be limited to privileged children whose caregivers can afford premium subscriptions.

We thank you for considering our concerns and recommended solutions. Should you wish to reach out to us for further discussion, we welcome your contact.

Respectfully,

Mur Haukum

Patrick Trueman, Esq. **Dawn Hawkins** 

President **CEO** 

Cc:

Alex Norström, Co-President and Chief Business Officer

Gustav Söderström, Co-President and Chief Product & Technology Officer

Eve Konstan, General Counsel

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