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European Union Terrorist Content Online Transparency Report 2023

The following report is published in accordance with Articles 7(2) and 7(3) of EU Regulation 2021/784, addressing the dissemination of terrorist content online (the Regulation). This report contains information for a period from 1 January 2023 to 31 December 2023.

1. GENERAL OBSERVATION

General observations outlining the efforts undertaken by SoundCloud to eliminate content violating our Terms and Conditions on our platform.

SoundCloud is an artist-first platform powered by a global community of artists and listeners (together "Users"). We go to great lengths to protect our platform and Users from undesired, harmful, and illegal content, including terrorist content. From the moment a user signs up to the website soundcloud.com or to the SoundCloud app (together the "Platform") they are required to agree to our Terms of Use and Community Guidelines (together the "Terms"). Our Terms clearly state that Users are not permitted to upload any illegal content or content that violates these Terms. The Terms of Use clearly reference a number of violative conditions that relate to content covered by the EU Regulation 2021/784, specifically the Terms of Use state that the following categories of content are forbidden on the Platform:

- Terrorist or extremist content
- Violence
- Illegal or unlawful

As a further means of restricting the actions of potential bad actors signing up to the Platform, it's also not possible for Users to upload audio content or send messages or comments without first confirming their email address. We conduct regular checks on the legitimacy of the email itself, blocking disposable or spam email domains from signing up to the Platform, ensuring Users are genuine actors guarding against those attempting to spread terrorist content with anonymity.

Our Community Guidelines are a supplement to our Terms of Use written so Users can easily understand our rules and what is expected of them. Our Community Guidelines contain clear sections regarding violation categories which explicitly references terrorist content. We endeavor to ensure Users have access to resources that help them understand what SoundCloud prohibits, how terrorist content is determined, reporting options and what is and isn't allowed on the Platform.

Alongside our Community Guidelines, we have our Help Center which is a centralized resource hub for our Users to access information on common questions, troubleshoot issues, and get help with their queries quickly and efficiently. It is also where we highlight our policy and safety information in an easy and accessible way. For terrorist content we use the Help Center to provide further insight into what we consider terrorist content with links to additional resources, and how to report it to us. To ensure that Users can find the information they are looking for, we have tags implemented to ensure that the most relevant content and articles appear when searching terms like "terrorism".

Where Users find any content to be in violation of our Terms, report forms are available on the Platform. These enable Users to report any content for review, leading to removal where necessary.

Additionally, Users also have the ability on the SoundCloud platform not only to access education resources and report content, but also to block, moderate and remove certain content. For example any user who uploads content to SoundCloud has the ability to remove (and report) any comment on their tracks. This provides a quick way for Users to remove unwanted interactions on their content and is another manner in which content can be removed swiftly. Users can also block another user preventing them from having direct interaction with them, such as through messaging, commenting, liking, following or reposting their content. Upon blocking, Users tracks will be removed from autoplay and related tracks, meaning that if a user comes across content they do not want themselves or their listeners to hear, they can remove it from showing after their own tracks and not have to be exposed further to the content. This relates specifically to terrorist content as it results in quicker removal of illegal comments, less visibility of accounts as they are prevented from interacting with more Users and reduced visibility of content through auto-play and related tracks.

SoundCloud is actively engaged with multiple law enforcement agencies and organizations to understand the terrorist content landscape and ensure content is effectively moderated and removed.

In order to proactively identify and remove content that violates our Terms, we make use of an array of detection methods broadly categorized as:

Detection Technologies:

We deploy media matching technologies to help detect content which may violate our Terms, including terrorist content. This technology allows us to flag potentially violative content at scale and automate removals when possible. These technologies allow us to act accurately and swiftly on violating content.

User reports:

EU based Users of SoundCloud, both signed in and non-signed in, can report content they believe to be violative quickly and easily via report buttons on each piece of content. Additional report forms are available to all Users and are found via our Help Center. Once a report is filled, the content is routed to our moderation team to evaluate against our Terms of Use.

Human moderators:

Our moderation team receives in-depth training in order to enforce our Terms consistently. Their work focuses on items flagged via both detection technologies and user reports and is engaged where human review is required to make an accurate decision.

2. IDENTIFYING, REMOVING AND PREVENTING THE REAPPEARANCE OF TERRORIST CONTENT

Article 7(3)(a) information about the hosting service provider's measures in relation to the identification and removal of or disabling of access to terrorist content;

Article 7(3)(b) information about the hosting service provider's measures to address the reappearance online of material which has previously been removed or to which access has been disabled because it was considered to be terrorist content, in particular where automated tools have been used;

At SoundCloud we strictly prohibit the dissemination of terrorist content and are committed to its prompt removal from the platform.

Our definition of terrorist organizations takes into consideration UN, US and EU lists of terrorist designated organizations and is further supplemented by our policies on 'Illegal Content'. This policy states that "We do not condone the use of the SoundCloud platform to spread hateful or violent content by extremist groups or organizations. This includes terrorist groups (as

sanctioned by international law enforcement authorities) who have committed violent acts in the past motivated by racial or religious hatred."

It's worth noting that insofar as our policies on 'Illegal Content' inform our decisions on terrorist content, not all content removed under this policy would be considered to be within the realms of terrorist content as defined under the Regulation..

In instances where an illegal organization that is not designated as a terrorist group is concerned, content is only considered as relevant to the Regulation where it clearly aligns with the definitions of terrorist offenses (see below).

Our definitions of terrorist offenses reflect the details Pursuant to Article 3 of the Regulation. These are depicted primarily in our violent content policies, these state "Any content inciting violence i.e. calling on or encouraging others to complete violent acts (against an individual or against the wider public), should be viewed as a violation of our [Terms of Use]."

SoundCloud is committed to monitoring and reviewing its policies and processes on a regular basis to ensure their effectiveness and alignment with current applicable regulations.

We have implemented a suite of measures to address the dissemination of terrorist content via our Platform. In implementing these measures we are guided by the principles and requirements set forth in Article 5(3) of the Regulation – particularly understanding that any measures that we take must be subject to appropriate and robust safeguards to ensure the protection of fundamental rights, including the right to respect for private life, to the protection of personal data, and freedom of expression, including the freedom to receive and impart information.

We have mobilized resources from across the company and with external partners to guarantee the effectiveness of these measures, whilst also ensuring sufficient staffing levels to promptly review and remove all content flagged for further review via detection technologies and user reports.

We look to take proactive measures in the detection and prevention of terrorist content where possible. Accordingly, we have introduced measures to proactively monitor new track uploads for terrorist content, partnering with industry leaders specialized in the detection and removal of terrorist content. Through leveraging various technologies, we both automate the removal of the most obviously violative content and empower our moderation team to keep Users safe by flagging possibly violative content for further review.

We remain committed to developing new technical means to detect and remove terrorist content that will over time allow us to have an even more robust approach to the detection of this content.

Specific Measures to identify and remove Terrorist Content

The below section provides more information on the measures taken to identify and remove terrorist content in the relevant reporting period. These measures include:

- **Audio Matching**

We use audio matching technology to detect when someone is trying to upload content that is identical or near-identical to audio that is known to be terrorist content. Where deemed appropriate and proportional this measure will result in the automated removal of either the individual piece of content in question, or the entire account responsible for its upload.

- **Text Models**

We use sophisticated text models and numerous keyword lists of terms associated with known terrorist organizations in order to identify known terrorist content. Where deemed appropriate and proportional this measure will result in the automated removal of either the individual piece of content in question, or the entire account responsible for its upload.

- **Logo Detection**

We use logo detection on images uploaded to the Platform in order to detect images containing logos of known terrorist organizations. We use this measure to flag content for review by our moderation team.

- **Intelligence Led Content Referrals**

We have employed a team of intelligence experts to detect content hosted on SoundCloud and shared elsewhere that contains known terrorist content. Where found this content is referred to our moderation team to review. A decision on content or account removal is then decided upon in line with our [Moderation Policies](#).

- **Targeted Searches**

We have deployed targeted searches on the catalog of content. Using data points related to known terrorist content, these searches aim to find previously uploaded violative content. Following detection a decision on content or account removal is decided upon in line with our [Moderation Policies](#).

- **User Friendly Reporting Mechanisms**

We have made the reporting of terrorist content as easy as possible for our Users to allow their participation in our efforts to detect violative content on the Platform.

- **Terrorist Content Analytics Platform Participation**

We participate in Tech Against Terrorism's Terrorist Content Analytics Platform (TCAP), receiving alerts or known terrorist content found on our platform and engaging processes swiftly to ensure the removal of content.

- **Username & URL Restrictions**

We put limitations on the profile names, URLs and profile descriptions used on the Platform. We ensure that terms considered unequivocally to be associated with terrorist organizations are prohibited from use in profile names and track titles on SoundCloud.

Specific Measures against the Reappearance of Terrorist Content

The below section provides more information on the measures taken to address the reappearance of terrorist content in the relevant reporting period. These measures include:

- **Adding Detected Audio Content to Databases**

Where content is removed following detection via means other than audio matching, and where appropriate, we ensure to subsequently add the audio of the detected content to our audio matching system. This allows us to detect this content when uploaded again in the future. Where duplicate or similar audio files are used, this measure allows us to detect the content even where the presentation (image, title etc.) is otherwise changed.

- **Updating Text Models and Keyword Lists**

Where content is removed following an audio match, we will subsequently add textual content to the relevant databases and systems to further aid future detection. Likewise, we ensure newly detected, previously unknown, content results in any appropriate textual elements being added to the relevant keyword lists.

- **Email Restrictions**

When a User is removed following Terms of Use violations, we ensure that the email used to create the account in question is also permanently disabled from creating any new accounts on the Platform. This prevents the same content being uploaded by an identical account.

- **Username and URL Restrictions**

Where a violative account has been detected we will, where appropriate, add the username and URL in question to our restricted list. This sees us routinely updating the list of terms deemed to be clearly violative and inappropriate for use in Usernames and URLs. This has the effect of making it more difficult for users to create identical violative accounts.

For any measures that we consider taking against the misuse of the Platform for the dissemination of terrorist content, we duly assess the impact of these measures on the rights and legitimate interest of our Users. Only content that we, our external partners, or any automated systems found to have a relevant risk of qualifying as terrorist content in a first-level review are brought to the attention of our content moderation teams to decide on any potential moderation decisions.

Our goal is to ensure that legitimate content on the Platform remains unaffected by the measures and processes that we put in place. Where content is affected, we ensure that in the majority of instances, there is a human in the loop to make sure that the application of policy in the removal of content is not overzealous.

The measures depicted above are applied in a non-discriminatory manner. Content flagging is done based on objective criteria, such as audio matches to known terrorist content, keywords related to known terrorist content, etc. The location, origin, or beliefs, etc. of the Users whose content is flagged is not factored into the processes in which content is flagged in any form. No personally identifying user data is used in any of our processes, which rely entirely on data related to the content in question.

3. REMOVALS AND APPEALS

Article 7(3)(c) the number of items of terrorist content removed or to which access has been disabled following removal orders or specific measures, and the number of removal orders where the content has not been removed or access to which has not been disabled pursuant to the first subparagraph of Article 3(7) and the first subparagraph of Article 3(8), together with the grounds therefor;

Article 7(3)(d) the number and the outcome of complaints handled by the hosting service provider in accordance with Article 10;

Article 7(3)(g) the number of cases in which the hosting service provider reinstated content or access thereto following a complainant by the content provider.

The data provided below reflects the volume of requests for content removals received from Competent Authorities, as well as removals resulting from any proactive measures taken. It also depicts the number of resultant appeals received and their outcome.

Content Removals

Reports of terrorist content from Competent Authorities are submitted for review via a designated channel which has been integrated into the Europol protocols on the reporting of such content.

These are received either as Removal Orders or Referrals. A process to expeditiously deal with both Removal Orders and Referrals from Competent Authorities has been established.

When we receive either a Removal Order or a Referral from a Competent Authority, we first review it against our [Terms of Use](#). If we determine that the content constitutes a violation, we remove it. As our policies are aligned to EU regulations, in most instances this results in the removal of content reported via Competent Authorities.

For the period of 1 January 2023 to 31 December 2023, we received 2 Removal Orders through our dedicated channel from Competent Authorities. Removal orders from Competent Authorities resulted in the removal of 2 pieces of content.

As mentioned in the preceding sections, we also take specific measures to detect and remove terrorist content in line with Article 5 of the Regulation. For the period of 1 January 2023 to 31 December 2023, we removed 15766 pieces of content as a result of these specific measures.

Appeals

Where content has been removed following a decision that deemed it to be violative, Users are given the option to report their objection to the original decision. When someone appeals a decision, the content is reviewed again by a different member of the moderation team who determines if the original decision was correct. This process allows us to ensure fairness and accuracy in the moderation of flagged and reported content.

For the period of 1 January 2023 to 31 December 2023, we received 100 appeals from users regarding content removed in connection with specific measures taken in line with Article 5 of the Regulation. Out of these appeals a total of 9 were remedied upon review of the original decision.

4. ADMINISTRATIVE OR JUDICIAL REVIEW PROCEEDINGS

Article 7(3)(e) the number and the outcome of administrative or judicial review proceedings brought by the hosting service provider;

Article 7(3)(f) the number of cases in which the hosting service provider was required to reinstate content or access thereto as a result of administrative or judicial review proceedings;

For the period of 1 January 2023 to 31 December 2023, we initiated no administrative or judicial review proceedings under the Regulation and were also not required to reinstate content or access thereto as a result of any such proceedings. As such, there is no further information to include with regard to Article 7(3)(e) or (f).