



Google Ireland Transparency Report Under Regulation (EU) 2021/1232

The European Parliament and the Council have introduced Regulation (EU) 2021/1232 on a temporary derogation from certain provisions of Directive 2002/58/EC as regards the use of technologies by providers of number-independent interpersonal communications services for the processing of personal and other data for the purpose of combating online child sexual abuse (the "**Regulation**"). The providers of electronic communication services ("**ECS**") in scope of the Regulation must publish a transparency report on the processing of personal data under this Regulation on an annual basis. This report provides information on the processing of personal data for the purpose of detecting and removing online child sexual abuse and reporting it to the National Center for Missing and Exploited Children ("**NCMEC**") for the ECS in scope of the Regulation within the European Union ("**EU**").

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Transparency Report Under Regulation (EU) 2021/1232

Overview

Google Ireland Ltd (“Google”) is committed to fighting online child sexual abuse. Child sexual abuse material (“CSAM”) is illegal and our Terms of Service prohibit using any of Google’s platforms or services to store or share this content. Our teams work around-the-clock to identify, remove, and report this content, using a combination of industry-leading automated detection tools and specially-trained human reviewers. We report CSAM to NCMEC, the clearinghouse and comprehensive reporting center in the United States for matters related to child exploitation. NCMEC may send those reports to law enforcement agencies around the world. For more information on Google’s global efforts to combat CSAM, please see Google’s CSAM [Transparency Report](#), accompanying [FAQs](#) and [blog](#). Additionally, Google’s [Protecting Children](#) site outlines our broader efforts to detect, prevent, and remove online child sexual abuse from Google’s services.

This report describes Google’s efforts and resources to detect online child sexual abuse through automated technologies deployed in Google’s ECS in scope of the Regulation as it pertains to users in the EU. This report captures information for the period from January 1, 2023 to December 31, 2023, and is published on an annual basis. The numbers below cover the consumer version of Google Chat, Hangouts¹ and Gmail for the relevant time period for EU users.

¹Hangouts was deprecated in November 2022. Consequently, this report only captures information for stored historic Hangouts data detected during this reporting period.

Number of accounts where online child sexual abuse was identified through automated technologies: 635²

This metric shows the total number of Google accounts in which online child sexual abuse was identified through automated technologies for EU users.

²Google does not currently scan text for solicitation of children in ECS in scope of the Regulation, therefore this was not included in this metric.

Number of CyberTipline reports sent to NCMEC: 734

When we identify CSAM on our platforms, we make a “CyberTipline” report to NCMEC. This metric shows the total number of CyberTipline reports sent to NCMEC associated with the above accounts. It may be the case that more than one report is sent on a particular account.

Number of pieces of content identified and reported to NCMEC: 1558

A single CyberTipline report may contain one or more pieces of content depending on the circumstances. This content could include, for example, images and videos. This metric shows the total number of pieces of content identified and reported to NCMEC associated with the above accounts.

Number of the above accounts disabled for online child sexual abuse where the user appealed: 297

This metric shows the number of the above Google Accounts disabled for online child sexual abuse where the user appealed the disable decision using Google's internal redress mechanism or lodged a complaint with a judicial authority.

Number of the above accounts reinstated following appeal: 10

This metric shows the number of the above Google accounts that were reinstated following an appeal through Google's internal redress mechanism or a complaint with a judicial authority for the services in scope of the Regulation within the EU.

Additional Information under the Regulation

The type and volumes of data processed for online child sexual abuse under the Regulation

For the purpose of detecting and removing online child sexual abuse and reporting it to NCMEC in the services in scope of the Regulation within the EU, Google may process images, videos, and other media types where people could generate CSAM. To effectively combat this abhorrent material on our platforms, Google may need to process data related to the user responsible for the content, metadata related to the content, and data related to a potential victim. Abuse operations data is also processed to help facilitate detection of online child sexual abuse. Google's processing of data under this Regulation is tailored to the subset of data in the account which is likely to contain detectable online child sexual abuse. During this reporting period, and specifically with regard to volumes of data processed under this Regulation, Google identified and reported 1558 pieces of content associated with 734 CyberTipline reports and 635 Google accounts for the ECS in scope of the Regulation within the EU.

The specific grounds under the General Data Protection Regulation (GDPR) relied on for the processing of personal data pursuant to this Regulation

When Google processes personal data under this Regulation for the purpose of detecting and combating online child sexual abuse, it does so on the GDPR grounds that the processing is necessary in order to protect the vital interests of children and those who are the victims of online child sexual abuse. In addition, that processing is necessary for the purposes of the legitimate interests of Google to detect, prevent or otherwise address online child sexual abuse on Google's services, and to protect Google users, customers, partners, and the public from this egregious form of illegal content. The processing is also necessary for the purposes of the legitimate interests of victims of child sexual abuse and the organization to whom Google reports online child sexual abuse (NCMEC) to detect, prevent and remove online child sexual abuse from Google's services.

The European Parliament and the Council recognized that the voluntary scanning activities of providers of ECS to detect online child sexual abuse on their services and report it to law enforcement authorities or to organisations acting in the public interest against child sexual abuse are important in reducing the further dissemination of CSAM and in enabling the identification and potential rescue of child victims, whose fundamental rights to human dignity and to physical and mental integrity have been severely violated.³ The European Parliament and the Council therefore passed the Regulation in order to enable those providers to continue using such voluntary measures to combat online child sexual abuse.

Please see more details on the legal grounds of processing in the [Google Privacy Policy](#).

³Recital 7 of the Regulation.

The ground relied on for transfers of personal data outside the European Union pursuant to the GDPR

As described in our [Data Privacy Framework \(DPF\)](#) certification, we comply with the EU-US DPF as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from the European Economic Area. Google has also provided appropriate safeguards in the form of [Standard Contractual Clauses](#).

Please see more details in the Data transfer section of the [Google Privacy Policy](#).

The number of cases of online child sexual abuse identified and in which a user has lodged a complaint with the internal redress mechanism or with a judicial authority and the outcome of such complaints

During this reporting period, Google identified and reported 1558 pieces of content associated with 734 CyberTipline reports and 635 Google accounts for the ECS in scope of the Regulation within the EU.

297 user accounts appealed the disable decision using Google's internal redress mechanism. None of the user accounts lodged a complaint with a judicial authority based on detection within the services in scope of the Regulation within the EU. 10 of the above Google accounts were reinstated following an appeal through Google's internal redress mechanism. In each of these 10 cases, the reinstatement was not due to an error in detection or a content-level false positive, but rather a reinstatement based on contextual information identified during the appeal process, which indicated that the content was correctly identified but did not appear to be possessed or shared with intent to harm, abuse, or exploit children.

The numbers and ratios of errors (false positives) of the different technologies used

Google does not apply each technology to detect online child sexual abuse in isolation. Rather, technologies are usually used in combination with one another, which may be further augmented by human review, in order to reduce errors or false positives. In 2023, Google relied on technology including hash-matching to detect known CSAM, and machine learning classifiers to discover never-before-seen CSAM, which was then confirmed by Google's specialist review team.

Hash-matching:

During this reporting period, 18 pieces of content within scope of the Regulation were incorrectly flagged by Google's hash-matching technology.⁴ These errors were identified by human review during the detection processes and were not actioned for CSAM violations. This means that the content was not removed or reported externally, and the user did not lose access to their account due to this content being incorrectly flagged.

Classifiers:

Machine learning classifiers⁵ are used to sort and prioritise content that is very likely to constitute apparent CSAM, including never seen before CSAM or "new CSAM", in a queue for human review and confirmation. As a consequence, there is no risk of "false positives" by reason of this technology alone.

⁴This metric accounts for pieces of content where human review occurred upon detection, and the flagged content was determined not to be online child sexual abuse or sexually exploitative content of minors, or where the content clearly depicted a non-minor.

⁵Classifiers were only deployed over historic Hangouts data, not in Google Chat or Gmail. Please see footnote no.1 above.

The measures applied to limit the error rate and the error rate achieved

Google takes the goal of preventing CSAM on our platform seriously. Developing advanced technology to identify, remove and report CSAM requires us to continue investing in improving our infrastructure, detection mechanisms and human review processes.

Google regularly assesses the quality of its abuse detection technologies, both to fine tune precision (that we are detecting only CSAM) and recall (that we are not missing online child sexual abuse on our platforms).

From an operational perspective, we have a team of trained subject matter experts on CSAM. They deeply understand the nuances of child abuse and exploitation and apply this understanding to develop our policies and enforcement strategy. We also regularly consult with experts in the field to help ensure that we are accurate with our application of CSAM verdicts.

Human review and oversight are also a key part of the process. Google reviewers specialize in reviewing for online child sexual abuse and undergo robust training under guidance of counsel on how to recognize this content on Google's services. These reviewers and the verdicts that are applied undergo periodic quality control assessments as well.

Google has instituted appropriate quality control processes to ensure that errors are reduced, and if detected, that they are remediated expeditiously. For example, Google deploys measures such as independent hash verification, human oversight over the CSAM processing, and human review of each instance of possible never-before-seen CSAM prior to reporting to help ensure that errors are as limited as possible.

Google users whose accounts are ultimately disabled for online child sexual abuse are also given the opportunity to appeal the decision, and an appeal undergoes human review to confirm whether the correct decision was made.

Based on the above measures, Google achieved the error rate as described in the metrics above for the services in scope of the Regulation for EU users.

The retention policy and the data protection safeguards applied pursuant to the GDPR

When Google processes CSAM, its data protection principles ensure that there is a justified purpose for the processing, that the processing is of an acceptable level of quality, that the data used is proportional to the purpose, and that retention, access, and sharing are appropriately limited. CSAM that is detected within the scope of the Regulation is stored no longer than strictly necessary for the relevant purposes under the Regulation and, in any event, no longer than 12 months from when the CSAM is identified and reported, with possible extension based on a valid legal preservation request. Please see more details on data retention policy and the data protection safeguards in the [Google Privacy Policy](#).

Additionally, to ensure the accuracy of abuse decisions, Google human reviewers specialize in reviewing for online child sexual abuse and undergo robust training under guidance of counsel on how to recognize this content on Google's services, as described in the section above.

Google also has a comprehensive privacy program that ensures that data is accessed, used, or shared only in an authorized manner. Should issues arise, Google's incident response team promptly investigates any reported incidents and makes resolving them a high priority.

The names of the organisations acting in the public interest against child sexual abuse with whom data has been shared pursuant to this Regulation

Google reports apparent online child sexual abuse to the National Center for Missing and Exploited Children (NCMEC).