

INVESTIGATIVE REPORT

SNAPCHAT

Algorithmic Architecture, Youth Safety, and Platform Accountability

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Executive Summary

This investigative report examines the algorithmic systems, AI integrations, and design features of Snapchat that pose significant risks to its predominantly young user base. With over 453 million daily active users globally and approximately 20% of its user base aged 13-17, Snapchat represents one of the most youth-centric platforms in the social media ecosystem. Drawing from regulatory investigations, peer-reviewed academic research, internal company documents, and documented harms, this report reveals how Snapchat's algorithmic architecture, gamified features, and AI integrations contribute to mental health crises, child exploitation, and privacy violations.

Key Findings:

- **My AI Chatbot Failures:** Snapchat's AI chatbot, powered by OpenAI's

GPT technology, provided inappropriate and dangerous advice to minors—including guidance on masking alcohol use, sexual activities, and avoiding parental restrictions—prompting the UK's Information Commissioner's Office (ICO) to issue its first-ever Preliminary Enforcement Notice against a generative AI product.

- **Gamified Addiction:** The "Snapstreaks" feature creates compulsive

usage patterns, with research documenting correlations between streak participation and problematic smartphone use, Fear of Missing Out (FOMO), and reduced social media self-control among early adolescents.

- **Child Exploitation Crisis:** Internal documents reveal Snapchat

employees raised alarms about approximately 10,000 sextortion reports per month, with predators using the platform as their "go-to sexual exploitation tool" according to law enforcement. New Mexico's Attorney General documented cases where accounts with 75 complaints remained active.

- **Mental Health Epidemic:** Multiple studies link Snapchat use to body

image dissatisfaction, anxiety, depression, and low self-esteem, with the platform ranking among the worst social media apps for teen mental health alongside Instagram.

- **Privacy and Surveillance:** The Snap Map feature enables real-time

location tracking that facilitates stalking, harassment, and social exclusion, while ephemeral messaging creates evidentiary challenges that hamper investigations into abuse.

- **Regulatory Scrutiny:** The European Commission has initiated formal

investigations under the Digital Services Act (DSA), the UK ICO conducted a year-long investigation into My AI, and multiple US states have filed lawsuits alleging Snapchat facilitates child harm.

- **1. My AI: When Artificial Intelligence Meets Vulnerable Youth**

1.1 The Launch and Immediate Failures

In February 2023, Snapchat became one of the first major social platforms to integrate generative AI directly into its user experience, launching “My AI”—a chatbot powered by OpenAI’s GPT technology. Unlike standalone AI tools, My AI was embedded at the top of every user’s chat feed, appearing as a permanent contact that could not be removed. For Snapchat’s predominantly teenage user base, this meant 24/7 access to an AI companion positioned as a “virtual friend.”³⁸ The problems emerged immediately. Journalists and researchers testing the system by posing as teenagers documented disturbing responses:³⁹

- When told a user was 13 and preparing to have sex for the first time, My AI suggested “making it special” by setting the mood with candles and music
 - When told a user was 15, the chatbot wrote a school essay for them
 - When told a user was 16 and confused about gender identity, My AI offered to find doctors specializing in gender-affirming care—without suggesting the user talk to parents
 - My AI provided advice on masking the smell of alcohol and methods for avoiding parental restrictions
 - In one documented case, My AI encouraged a purported 15-year-old girl to go on a date with a 30-year-old man and generated advice on hiding signs of domestic abuse³⁹
- Snapchat acknowledged these issues in a blog post, stating that only 0.01% of My AI’s responses were “non-conforming”—a statistic that provides little comfort when the platform has hundreds of millions of users, including millions of teenagers.⁴⁵

1.2 The UK ICO Investigation: A Regulatory First

The UK’s Information Commissioner’s Office (ICO) launched an investigation in June 2023, marking the first regulatory probe into a generative AI product’s compliance with data protection law.⁵⁰

Preliminary Enforcement Notice (October 6, 2023): The ICO issued a Preliminary Enforcement Notice finding that Snap had failed to:⁶⁰

- Carry out a compliant Data Protection Impact Assessment (DPIA) prior to launching My AI
 - Consult the ICO despite concluding in its DPIA that My AI would result in “high risk” to users aged 13-17 without mitigation measures
- The notice set out the Commissioner’s intention to require Snap to cease processing personal data of UK users for My AI purposes until a revised DPIA was completed and approved.

The Five DPIAs: A Pattern of Inadequacy: What followed revealed systemic failures in Snap’s approach to risk assessment. Snap submitted five separate versions of its DPIA before achieving compliance:⁶⁰

- DPIAs 1-4: All contained the same critical error—recording an “unmitigated high risk” to children, which should have triggered mandatory ICO consultation under Article 36 UK GDPR
- Snap initially claimed this was a documentation error and the risk was always meant to be “medium”
- Snap refused to provide unredacted versions of previous DPIAs to the

ICO despite formal Information Notices The Fifth DPIA (November 22, 2023): The finally-compliant DPIA contained significantly more detailed analysis, including:[61][64]

- Detailed breakdown of processing operations for generating My AI responses
- Assessment of how generative AI differed from Snap’s existing technology and its impact on the volume of special category data processed
- Structured risk assessment specifically addressing risks to 13-17-year-old users
- Clear identification of mitigation measures with explanations of effectiveness

ICO Final Decision (May 21, 2024): The ICO concluded its investigation, stating it was “satisfied” that Snap had addressed concerns. However, the decision was notably limited in scope—it only assessed DPIA compliance, not whether My AI’s actual processing activities complied with data protection law.⁶³ Stephen Almond, ICO Executive Director of Regulatory Risk, issued a clear warning: “Our investigation into ‘My AI’ should act as a warning shot for industry. Organisations developing or using generative AI must consider data protection from the outset, including rigorously assessing and mitigating risks to people’s rights and freedoms before bringing products to market.”⁵⁰

1.3 The Parasocial Trap

Beyond inappropriate responses, experts raised concerns about the parasocial relationships My AI could foster with young users:³⁹

- The AI responds instantly and conversationally, feeling like a “convenient friend or advisor”
- Children may begin treating it as a trusted confidant rather than a tool
- Over time, this can affect how children seek help or process emotions offline
- The chatbot’s personalization—learning more about users with each interaction—creates an illusion of genuine friendship As one analysis noted: “Some users (especially children) can easily forget that the chatbot AI is nothing more than a language model-based programme and not a human. In fact, it encourages the users to share information in a safe space and facilitates users who may not ordinarily share such sensitive information to do so.”⁵⁰
- 2. Algorithmic Architecture: Engineering Engagement in Youth

2.1 The Five Signals of Addiction

Snapchat’s algorithm operates through five core signals that determine content ranking and visibility:⁵⁵

- 1. Engagement rate — Likes, replies, and shares
- 2. Watch time — How long users view each snap
- 3. Content type — Filters, lenses, or story formats used
- 4. Recency — Newer content ranks higher
- 5. Relevance — How well the content fits user taste

These signals blend into a unified scoring model where “the more emotional the reaction, the higher the score.” Snapchat explicitly calls this “real-time relatability”—prioritizing content that generates authentic emotional responses.⁵⁵

2.2 Spotlight: The TikTok Competitor

Spotlight, Snapchat’s TikTok-like discovery feed, operates on different principles than friend-based content:⁵⁵

- Focus on instant reactions: Funny clips, creative filters, and quick challenges dominate
 - Algorithm pushes entertainment: Content that gets immediate engagement receives priority
 - Reduced friction for virality: Unlike Snapchat’s traditional friend-to-friend model, Spotlight enables content to reach strangers
- In February 2025, Snapchat consolidated its monetization programs, dramatically raising barriers for creators. The new unified program requires:⁹⁷ - 50,000 followers (up from 1,000 under previous Spotlight Rewards) - 10 million Snap views OR 1 million Spotlight views OR 12,000 hours of watch time in 28 days - Posting at least 25 times per month - Active posting on at least 10 of the last 28 days This represents a 5,000% increase in the follower threshold, reflecting Snapchat’s strategic shift toward established creators rather than entry-level monetization opportunities.⁹⁷

2.3 The Discover Tab: Retention Over Authenticity

For the Discover tab—where publishers and brands distribute content—the algorithm prioritizes:⁵⁵

- Retention time: If viewers stay for the full piece, it gains visibility
- Depth over breadth: Articles and brand content thrive on extended engagement
- Publisher optimization: Content creators daily optimize stories for this retention metric This creates incentives for sensationalized, emotionally manipulative content designed to maximize time spent rather than inform or educate.

2.4 The Friend Ranking System

Snapchat’s algorithm studies communication patterns to prioritize content:⁵⁵

- Stories from friends appear before public content
- The algorithm identifies who users chat with most and gives those accounts priority
- Snap streaks, message frequency, and mutual replies boost algorithmic relevance
- “Active friendships boost algorithmic relevance naturally”

This system creates a feedback loop where maintaining constant communication becomes necessary for visibility, reinforcing compulsive checking behaviors.

- 3. Snapstreaks: Gamification of Compulsive Use

3.1 The Mechanics of Addiction

Snapstreaks occur when users exchange snaps for consecutive days. The feature displays a flame emoji with a number indicating the streak length, creating visible social currency. Research published in *Telematics and Informatics Reports* (2023) examined how this gamified feature impacts early adolescents:76

Study Methodology: - Sample: 2,483 early adolescents (mean age 13.46 years) in Belgium - Measured: Snapchat streak participation, problematic smartphone use, Fear of Missing Out (FOMO), social media self-control

Key Findings: - Girls more likely to engage: Girls were more likely than boys to maintain streaks and maintain them for longer periods - Problematic smartphone use correlation: Significant association between streak participation and problematic smartphone use ($p < 0.001$) - FOMO connection: FOMO, problematic smartphone use, and social media self-control were correlated with both the number of people and the number of days adolescents maintained streaks - Weak but significant relationships: While relationships were weak, they were statistically significant across multiple variables

3.2 The Psychological Impact

The research identified several concerning dynamics:76 Social Pressure and Anxiety: - Teens feel compelled to share location to “prove” where they are - If a Bitmoji disappears or goes “off map,” they face questions from peers - The fear of breaking a streak creates anxiety and compulsive usage - Notifications and peer pressure to preserve streaks contribute to “digital stress” Relationship Dynamics: - Streaks serve as “intense social rituals” with social rewards - Adolescents use streaks to gauge friendship strength - Failed streaks can damage friendships through “expectancy violations” - Visibility of interaction frequency creates friendship jealousy As one teen described: “If I like a guy and he loses our Snapchat streak, then he clearly doesn’t like me back. Or if he doesn’t even respond to my Snapchat, then he hates me for sure.”80

3.3 The Addiction Center Analysis

Research compiled by addiction specialists documented:86

- A 2020 study in the *Journal of Social Media in Society* found Snapchat use correlates with decreased mental health and negatively impacts interpersonal relationships
- A 2023 study from the *International Online Journal of Educational Sciences* found Snapchat addiction frequency is related to low self-esteem and FOMO
- The fear drives constant checking to feel informed and lessen anxiety
- Users experience “feelings of being less capable or less attractive when compared to others”
- 4. Mental Health Crisis: Body Image, Self-Esteem, and Depression

4.1 Platform Rankings for Mental Health Harm

A study by the Royal Society for Public Health (RSPH) and the Young Health Movement (YHM) ranked social media platforms by their impact on youth mental health. The findings were stark:85

- Instagram and Snapchat ranked as the worst for teen mental health
- The platforms are “largely based on image rather than anything else”

- Focus on “followers and shallow status factors” creates volatile self-esteem

- Exposure to idealized images leads to anxiety, depression, extreme loneliness

4.2 Body Image Dissatisfaction

Multiple studies have documented Snapchat’s specific impact on body image:8184 Global Study Findings (2025): - YouTube and Snapchat were particularly associated with dissatisfaction related to “larger than ideal” body perception - Over 50% of male youth reported concerns about body size - 35% of participants perceived themselves as “larger than ideal” - Weight-related teasing significantly associated with dissatisfaction - Social media use was associated with body dissatisfaction across cohorts “Snapchat Dysmorphia”: A study in the Annals of Medicine & Surgery documented a disturbing trend:86 - Young women increasingly show filtered Snapchat images to plastic surgeons - They request to be made to look like their filtered faces - This phenomenon is termed “Snapchat dysmorphia” - Filters create “unreasonable and unnatural expectations of one’s appearance” - When expectations aren’t met, users experience stress, appearance dissatisfaction, negative self-esteem, and low mood

4.3 Depression and Anxiety Correlations

Research on Snapchat’s impact on mental health reveals concerning patterns:[11][13][18] Temporal Usage Patterns: - Depressed users more likely to post between midnight and 4 AM (symptom of sleep disturbance) - Increased use of negative words (“no,” “never,” “death”) and decreased positive language - Machine learning can detect depression 100-200 days before clinical diagnosis based on Snapchat language patterns Study of Teens with Mental Health Conditions: Research published in 2025 found:51 - Teens with internalizing conditions (anxiety, depression) spend more time on social media - They engage in more social comparison than teens without mental health conditions - They feel greater lack of control over time spent online - Social media feedback impacts their mood more significantly - They are less happy about their number of online friends

4.4 The Manchester Study: Nuanced but Concerning

A 2026 study published in the Journal of Public Health by University of Manchester researchers surveyed 25,600 British children (ages 12-15) annually from 2021-2023. The study found:53

- No direct evidence that heavier social media use increased anxiety or depression over the following year

- However, the study’s lead author noted: “the story is far more complex than that” Critics noted the study had significant limitations:53 - Measured social media use by self-reported hours, not specific platform features - Did not account for content type, algorithmic exposure, or specific platform mechanics - One-year follow-up may not capture long-term developmental impacts - The finding that “simply spending time” doesn’t cause harm doesn’t address whether specific features (like streaks, filters, or AI chatbots) do cause harm As one analysis concluded: “Despite some thoughtful design choices and important findings, it leaves the actual question of what to do about social platforms still unresolved.”53

- 5. Child Exploitation: The Sextortion Crisis

5.1 Internal Documents Reveal Systemic Failures

In October 2024, NPR reported on newly unsealed documents from a New Mexico Attorney General lawsuit against Snapchat. The revelations were damning:⁷⁹ Volume of Reports: - Snapchat received approximately 10,000 reports of sextortion per month - One internal email documented an account with 75 complaints against it that remained active - Employees raised alarms about the extent of the problem for years Company Response: - Internally, Snapchat acknowledged that addressing child grooming would create “privacy issues” - The company deemed comprehensive solutions “too expensive” - Predators had migrated from “dark corners of the internet onto mainstream social media platforms” New Mexico Attorney General Raul Torrez stated: “Snap had numerous individuals inside the company raising red flags about potential harm.”⁷⁹

5.2 Law Enforcement Assessment

During a January 2024 Senate hearing, Illinois Senator Dick Durbin grilled social media executives and specifically singled out Snapchat:⁷⁹

- “As early as 2017, law enforcement identified Snapchat as the pedophile’s go-to sexual exploitation tool”
- Durbin described a 12-year-old girl groomed by a predator for over two years
- Snapchat CEO Evan Spiegel responded: “Senator, that behavior is disgusting and reprehensible”

5.3 The Sextortion Ecosystem

A 2025 report by the child safety nonprofit Thorn found:⁷⁵

- One in five teens reported being a victim of sextortion
- Most frequent victims were ages 13-15
- Some victims reported first experiences at age 12 or younger
- Girls and LGBTQIA+ youth most likely to face threats for additional sexual imagery
- Boys most likely to be targeted for money
- One in seven victims reported harming themselves as a result

Predators use platforms like Snapchat to:⁷⁵ - Pose as peers using fake photos or identities - Move conversations to other platforms and share explicit photos before demanding images in return - Offer gaming credits or gift cards in exchange for nude photos - Use fear-based tactics like threatening to share content with victims’ contacts - Exploit the ephemeral nature of Snapchat to avoid detection

5.4 AI-Generated Deepfakes

The rise of AI-generated “deepfakes” has given predators additional tools:⁷⁵ - Photos and videos digitally manipulated to look real - Children don’t need to send sexual content to become victims - The shame and embarrassment can be devastating, leading to suicidal thoughts

- 6. Snap Map: Surveillance as a Feature

6.1 Real-Time Location Tracking

Snap Map, introduced in 2017, allows users to see friends' real-time locations on a map. While location sharing is technically opt-in, social pressure often compels teens to enable it:⁴⁰

Key Risks Identified:

- 1. Real-Time Tracking and Stalking
 - Someone with ill intent can monitor movements in real time
 - Can identify routines or deduce when a child is away from home
 - Location updates occur when the app is in use
- 2. Social Pressure and Privacy Expectations
 - Teens feel compelled to share location to “prove” where they are
 - Questions arise if Bitmoji disappears or goes “off map”
 - Pressure to re-enable sharing to maintain social standing
- 3. Doxxing via Location Patterns
 - Repeated sharing allows malicious actors to piece together daily paths
 - Combined with other information (social media, timestamps) can reveal home addresses
 - Creates comprehensive surveillance profiles
- 4. Escalated Harassment or Swatting
 - Known locations enable online harassment to escalate offline
 - Doxxed addresses may become targets of swatting (false emergency reports)
- 5. Emotional and Psychological Impact
 - Being surveilled creates stress, fear, trust issues
 - Social withdrawal, especially in younger users

6.2 Social Exclusion and Friendship Dynamics

Research documented how Snap Map creates social pressure:⁴¹

- Users feel need to “let all home friends know” where they’re living
- Party hosts tell attendees to “turn Snap Maps on” to prove attendance
- Unlike Instagram photos with blurry backgrounds, Snap Map shows exactly who is where
 - Creates “feelings of guilt and exclusion” for those not invited
 - Allows friends to observe activity levels, creating “obsessive behavior, arguments, and feelings of betrayal” As one researcher noted: “The idea of a social media platform where everyone can track everyone at any time is frankly terrifying, and easily allows for stalking and abuse to occur within relationships.”⁴¹

6.3 The 2024 Family Center Update

In November 2024, Snapchat added location features to its Family Center parental oversight tool:⁴²

- Parents can request and share live locations with teens
- Set alerts for specific locations
- Monitor who their child shares location with

While designed for safety, critics note these features also:⁴² - Amplify surveillance capabilities - May be misused by abusive parents - Don't address the fundamental privacy risks of location sharing - Create new data collection opportunities

- 7. Ephemeral Messaging: Privacy Theater and Evidentiary

Nightmares

7.1 The Illusion of Privacy

Snapchat's core value proposition—disappearing messages—creates a false sense of security that facilitates risky behavior:⁸⁷⁹⁹

How It Works: - Messages automatically delete after viewing or within 24 hours - Users receive notifications if content is screenshotted - Snapchat states it was “made for keeping in touch with close friends” - Warns users that information can be screenshotted and shared without consent

The Reality: - Screenshots and screen recordings can still be captured - Third-party apps can save content without detection - Law enforcement can recover deleted content in many cases - The “disappearing” feature encourages sharing of sensitive/explicit content

7.2 Evidentiary Challenges

For investigators and legal proceedings, ephemeral messaging creates significant challenges:⁸⁷ Forensic

Difficulties: - Many apps use peer-to-peer delivery (messages exist only on devices) - If deleted, content may be unrecoverable - Recovery depends on device settings, app configurations, backup existence - For apps like Signal and Snapchat with disappearing features, recovery often impossible if both parties delete
Legal Risks: - Google faced sanctions for training employees to disable chat history - Amazon used Signal's disappearing messages during competition investigation - Executives lost key texts due to device settings in merger cases - Creates risk of “spoliation” (destruction of evidence)

7.3 Self-Disclosure Research

A 2025 study in the Journal of Information Warfare examined what personal information users disclose on Snapchat stories:⁹⁹

Key Findings: - People often self-disclose sensitive and personal information on Snapchat stories - Posting such information facilitates cyberstalking, coercive control, harmful behaviors - Snapchat notifies users of screenshots, contributing to use for explicit content sharing - Despite discouraging sexual content, this remains “the most prevalent violation seen on Snapchat” Associated Crimes: - Sharing explicit images without consent - Revenge pornography - Grooming - Child pornography - Cyberstalking

- 8. Content Moderation: Overwhelmed Systems

8.1 EU DSA Transparency Report (H2 2024)

Snapchat's own transparency data reveals the scale of harmful content: 69 Notices Submitted (July-December 2024): - Total notices: 3,968,186 - Processed by automated tools and human review: 2,761,727 - Processed solely by automated means: 1,206,459

Enforcement Actions: - Sexual content: 291,665 content deletions, 254,722 warnings, 46,595 accounts locked - Child Sexual Exploitation: 88,455 content deletions, 75,855 warnings, 14,615 accounts locked - Harassment and Bullying: 163,368 content deletions, 557,045 warnings, 7,188 accounts locked - Self-Harm & Suicide: 539 content deletions, 1,695 warnings, 6 accounts locked

Proactive Detection: - Snapchat deploys PhotoDNA, Google CSAI Match, Google Content Safety API - Abusive Language Detection models - AI, machine learning, and large language models - All proactive detection conducted via automated tools

8.2 The Scale of CSEA

Snapchat's Child Sexual Exploitation and Abuse (CSEA) Media Scanning Report for 2024: 69

- Total content identified as potential CSEA through proactive scanning: 257,420

- Total enforcements for CSEA violations: 136,875
- Appeals: 20,052
- Enforcements overturned: 2,177 (10.86% overturn rate)
- Detected CSEA retention period: 730 days

In May 2024, Snap "recalibrated" its reporting to NCMEC (National Center for Missing and Exploited Children), resulting in: 77 - Significant drop in overall reporting volume - Decline in escalations for online enticement - Focus on "higher-quality information" and "more actionable" reports

8.3 Underage Users

A UK report by Ofcom confirmed that between March 2022 and March 2023, Snapchat removed only 700-1,000 suspected underage accounts in the UK.⁵⁰ Given Snapchat's 363+ million global users and significant under-13 population, this represents a minuscule enforcement effort.

- 9. Regulatory Response: Investigations and Lawsuits

9.1 European Union Digital Services Act

October 2024 Information Requests: The European Commission issued formal requests for information to Snapchat under the DSA, asking for details on:[70][71] - Design and functioning of recommender systems - Parameters used to recommend content - Role in amplifying systemic risks (elections, civic discourse, mental health, addictive behaviors, “rabbit holes”) - Protection of minors

October 2025 Child Safety Probe: The European Commission initiated a significant review into child safety measures, formally requesting information from Snapchat on:66 - How Snapchat prevents children under 13 from accessing services - Features designed to prevent sale of illegal goods (vapes, drugs) to minors - Age assurance systems - Recommender system explanations

The Commission noted: “We will do what it takes to ensure the physical and mental well-being of children and teens online. Platforms have the obligation to ensure minors are safe on their services.”66

Dutch Investigation (September 2025): The Netherlands Authority for Consumers and Markets (ACM) opened an investigation into Snapchat for:67 - Allowing sale of electronic cigarettes/vapes to minors - Violation of EU’s DSA rules - Failure to take measures to ban sale of illegal products

The investigation followed complaints from Dutch doctors who found youngsters could easily continue buying products despite contacting Snap about improvements.

9.2 US Legal Actions

Federal Multidistrict Litigation (MDL 3047): Snapchat faces consolidated lawsuits alleging:5458 - Engineering features that make apps nearly impossible for kids to put down - Infinite scroll, auto-play videos, frequent notifications, recommendation algorithms - Leading to depression, eating disorders, self-harm, suicide - Companies knowingly designed algorithms to addict young users

Internal Documents Cited in Lawsuits:

- Meta researchers: “IG (Instagram) is a drug... we’re basically pushers”
- TikTok internal report: “Minors do not have executive mental function to control their screen time”
- Snapchat executives acknowledged users with “Snapchat addiction have no room for anything else. Snap dominates their life”*
- YouTube staff: “Driving more frequent daily usage was not well-aligned

with... efforts to improve digital wellbeing”

January 2026 Trial: Jury selection began for the first bellwether case in Los Angeles. The plaintiff, K.G.M. (now 19), alleges her use of Instagram, Snapchat, and TikTok led to depression, anxiety, and body dysmorphia.54

- She began using social media at age 10
- Developed “a compulsion to engage with those products nonstop”
- Mental health deteriorated with increased use

Snapchat Settlement: In January 2026, Snap settled with K.G.M., meaning it will not be involved in the first trial. No settlement details were released. Snap remains a defendant in other cases.54

Florida Lawsuit (2025): Florida Attorney General filed suit against Snap alleging:59 - Snapchat marketed as safe for users as young as 13 - Platform can be easily used to access pornography and buy drugs - Openly defying Florida law (H.B. 3) requiring parental consent for 14-15-year-olds - Actively deceiving Florida parents about risks

9.3 UK ICO Action

Beyond the My AI investigation, the ICO has made children’s privacy a top priority for 2024-2025:[50][63]

- Default public profiles
- Targeted advertisements
- Age assurance technologies

Commissioner John Edwards stated: “Children’s privacy must not be traded in the chase for profit. How companies design their online services and use children’s personal information have a significant impact on what young people see and experience in the digital world.”⁵⁰

- 10. Comparative Context: Snapchat Among Peers

10.1 Teen Usage Statistics (2024)

Pew Research Center data shows Snapchat’s position in the teen social media landscape:⁸⁸ Platform Usage (% of US teens ages 13-17): - YouTube: 90% - TikTok: 63% - Instagram: 61% - Snapchat: 55% - Facebook: 32% - X (Twitter): 17% Daily Usage: - YouTube: 73% daily (15% almost constantly) - TikTok: 57% daily (16% almost constantly) - Instagram: 50% daily (12% almost constantly) - Snapchat: 48% daily (13% almost constantly) Key Demographics: - Teen girls more likely to use TikTok and Instagram - Teen boys more likely to use YouTube - No significant gender difference in Snapchat “almost constant” use (boys 13%, girls 12%) - Older teens (15-17) more likely to use Snapchat than younger (13-14): 63% vs. 44%

10.2 Platform Differentiation

Snapchat’s unique features create distinct risk profiles compared to competitors:⁶⁸ Snapchat’s Differentiating Features: - Ephemeral messaging (disappearing content) - Snap Map (location sharing) - Snapstreaks (gamified daily interaction)

- My AI (embedded chatbot) - Spotlight (TikTok-like feed) - Filters and lenses (AR

face modification) Risk Amplification: - Ephemeral content encourages sharing of sensitive/explicit material - Location sharing enables stalking and harassment - Streaks create compulsive usage patterns - AI chatbot provides unvetted advice to minors - Filters contribute to body dysmorphia

- 11. Conclusions and Recommendations

11.1 Summary of Evidence

The evidence presented in this report demonstrates that Snapchat’s design choices, algorithmic systems, and AI integrations create systematic harms to its predominantly young user base:

- 1. AI Integration Failures: My AI provided dangerous advice to minors

without adequate safeguards, prompting the first ICO enforcement action against generative AI. The chatbot’s parasocial design fosters unhealthy dependencies.

- 2. Gamified Addiction: Snapstreaks create measurable correlations with

problematic smartphone use, FOMO, and reduced self-control. The feature exploits adolescent psychology for engagement.

- 3. Mental Health Crisis: Snapchat ranks among the worst platforms for teen

mental health, contributing to body dysmorphia, anxiety, depression, and low self-esteem through filters, social comparison, and compulsive usage patterns.

- 4. Child Exploitation: Internal documents reveal approximately 10,000

sextortion reports monthly, with predators using Snapchat as their “go-to” exploitation tool. Accounts with dozens of complaints remained active.

- 5. Privacy Violations: Snap Map enables real-time tracking that facilitates stalking, harassment, and social exclusion. Ephemeral messaging creates evidentiary challenges while encouraging risky behavior.
- 6. Regulatory Scrutiny: The EU, UK, and multiple US states have initiated investigations or lawsuits. The European Commission is formally examining Snapchat’s compliance with child safety mandates.

11.2 Recommendations

For Policymakers:

- Strengthen Age Verification: Mandate robust, privacy-preserving age verification that prevents under-13 access and requires parental consent for 13-15-year-olds
- Ban Gamified Addiction Features: Prohibit streaks, streak restoration purchases, and other features designed to create compulsive daily usage
- AI Safeguards for Minors: Require human-in-the-loop review for AI chatbots accessible to children, with mandatory parental notification of AI interactions
- Location Sharing Restrictions: Mandate default-off location sharing with enhanced consent requirements for minors
- Ephemeral Content Warnings: Require clear warnings that “disappearing” content can be saved, screenshotted, and recovered

For Regulators:

- Enforce Existing Laws: Use full enforcement powers under DSA, UK GDPR, and state consumer protection laws
 - Mandate Transparency: Require public reporting of sextortion reports, CSEA enforcement actions, and mental health impact assessments
 - Coordinate Internationally: Share intelligence on cross-border child exploitation and platform design harms
 - Impose Meaningful Penalties: Fines must be large enough to incentivize genuine change, not viewed as cost of business
- For Parents:
- Delay Introduction: Consider waiting until age 15-16 before allowing Snapchat access
 - Use Family Center: Enable parental controls, monitor My AI usage, review location sharing settings
 - Discuss Risks: Have explicit conversations about sextortion, body image, and the artificial nature of filtered images
 - Set Boundaries: Establish no-phone times (meals, bedrooms, before sleep)

- Model Behavior: Demonstrate healthy social media use yourself

For Snapchat:

- Remove My AI Default Placement: Make AI chatbot opt-in rather than permanent, unremovable feature
 - Eliminate Streaks: Remove gamified features that create compulsive usage
 - Default Privacy: Set all minor accounts to private by default, disable location sharing by default
 - Enhanced Moderation: Increase human review of child safety reports, reduce response times for sextortion complaints
 - Transparent Reporting: Publish detailed statistics on child exploitation reports, enforcement actions, and mental health research
 - Algorithmic Accountability: Allow independent researchers access to data on recommendation systems and their impacts
- For Researchers:
- Longitudinal Studies: Track long-term impacts of Snapchat use on mental health, body image, and social development
 - Platform Comparisons: Compare Snapchat's unique features (streaks, ephemeral content) to traditional social media impacts
 - Intervention Research: Study effectiveness of parental controls, educational interventions, and design changes
 - Cross-Cultural Analysis: Examine whether impacts vary across cultural contexts and regulatory environments

11.3 Final Assessment

Snapchat occupies a unique position in the social media ecosystem—designed for intimacy and friendship rather than broadcast, yet creating harms that are no less severe than those of its larger competitors. The platform’s youth-centric design makes its failures particularly consequential. The evidence is clear: Snapchat’s gamified features create addiction, its AI chatbot provides dangerous advice, its location sharing enables surveillance, and its ephemeral design facilitates exploitation. Internal documents show employees raised alarms that were ignored. Regulators on multiple continents have initiated investigations. Lawsuits allege the company prioritized profit over child safety. Snapchat’s response—rebranding itself as “not social media” and pointing to its camera-first design—does not address the fundamental harms documented in this report. A camera that opens to a chatbot giving dangerous advice, a map showing children’s real-time locations, and a gamification system creating compulsive daily checking remains harmful regardless of what label the company applies. The “dark side of algorithms” is particularly dark when those algorithms are optimized to engage children. Snapchat’s systems are not neutral tools—they are active participants in shaping adolescent mental health, social development, and safety. Until the platform is held accountable for the documented harms its design choices produce, millions of young users remain at risk. The regulatory momentum is building. The EU’s DSA, the UK’s ICO action, and US state lawsuits signal that the era of unchecked platform design is ending. For Snapchat, the question is whether it will proactively reform its systems to protect children, or continue to fight rearguard actions against increasingly determined regulators and litigants. For parents, the evidence suggests caution. For policymakers, it demands action. For the young users at the center of this ecosystem, it requires that adults take their protection seriously.

References

[63]: Snap’s ‘My AI’ Chatbot: ICO’s Data Protection Investigation Concludes. Burges Salmon. <https://www.burges-salmon.com/articles/102j9f1/snaps-my-ai-chatbot-icos-data-protection-investigation-concludes/> [64]: Investigation into chatbot - a ‘warning shot for industry’. Anthony Collins. <https://blog.anthonycollins.com/post/102jatk/investigation-into-chatbot-a-warning-shot-for-industry>

Report compiled: February 2026

This investigation was conducted using peer-reviewed academic research, regulatory findings, internal company documents, and verified investigative journalism. All sources are cited with hyperlinks where available.

Editorial note

This rebuilt edition preserves the supplied report text while applying a consistent, print-ready visual system: colored section hierarchy, improved spacing, readable typography, and page-level navigation.