VSP recommends or user searches for content



The Family Pairing parental controls can place limits on what a child can search for; see and how they might interact with other users.

User watches and engages with content



Terms of service restrict what users can see, but TikTok does not currently give users that upload content tools to give that content a rating (i.e. whether content might contain material unsuitable for u18s).

User encounters harmful material and flags or reports



TikTok places emphasis on its own proactive moderation to review and detect uploaded content in breach of its policies

Users also have tools to report and flag, but users cannot apply ratings to potentially harmful material.

Trusted third-party flaggers monitor and flag harmful content.

User informed of outcomes



Within the TikTok app, users get updates on the outcome of TikTok's review of content that users have reported, including whether the content was in violation of the platform's terms and conditions.

User access to other tools (e.g. Media Literacy)



TikTok offers a range of tools and information to improve users' media literacy, including: TikTok-funded videos by creators; on-site safety centre and portals; offline initiatives with other organisations.

## Signing on

Users can view a limited amount of content without an account

- 6.19 TikTok has said that, when using the mobile app, UK-based users are required to register an account and log-in to view video content on the platform. For visitors to the TikTok website who have not logged in, the videos that are available to those without an account are subject to a number of restrictions:
  - a) They have been through several rounds of human moderation;
  - b) Any content that has a warning notice will not be eligible to appear; and
  - c) Videos with captions or hashtags that hit "sensitive word lists" will not be eligible to appear.
- 6.20 Users must create an account and sign in to upload any videos to TikTok.

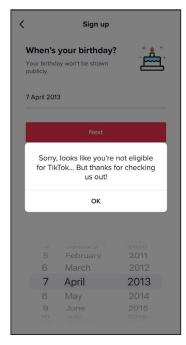
Users are asked their age when they are creating an account

- 6.21 TikTok asks its users to self-declare their age when registering for an account. The platform uses a neutral age gate to avoid nudging users to select the minimum required age.
- 6.22 Yonder research commissioned by Ofcom in 2022 showed that one third of under-18s lie about their age when creating a social media account. The research also showed that some younger respondents, aged 8-12, have done this when registering for accounts on platforms with an age requirement of 13+. TikTok was the platform where children 8-12

were most likely to say they had lied about their age (65%).<sup>31</sup> Age assurance is one of **Our strategic priorities in Year 2**, and we will continue to engage with TikTok on this important topic.

Figure 6.3: The alert shown to users under the age of 13 if they attempt to sign-up for a TikTok account





Source: Screenshot provided by TikTok in response to Ofcom's information request, June 2022

- 6.23 TikTok detects suspected underage accounts through a combination of user reporting, third-party reporting, and automated detection measures based on textual indicators. Suspected underage accounts are subject to moderator review and are removed if the user is considered to be under the age of 13.
- 6.24 TikTok is the only VSP that currently reports publicly on the number of suspected underage accounts it removes. According to its own Transparency Reports, TikTok removed nearly 60 million accounts globally on the basis of suspected underage use from April 2021 to April 2022.
- 6.25 Suspended users are temporarily blocked from creating a new account from any device and can appeal this ban by confirming their age through submission of either ID, a selfie with a trusted adult (under 18), or temporary credit card authentication (over 18).

<sup>31</sup> Children's Online User Ages Quantitative Research Study (ofcom.org.uk)

TikTok has notified users of updates to their terms of service via an in-app notification

- 6.43 TikTok sent users an in-app pop up in May 2022 to notify users of a change of its Terms of Service that would come into effect the following month. Users were given three options ('Agree', 'Remind me later', and 'Learn more') and could not continue onto the app without selecting one of these options. The 'Agree' option was in bold, inviting users to select this. Only by selecting 'Learn more' was a user actually presented with the details of the changes to the terms.
- 6.44 TikTok also publicises changes through 'newsroom posts' on their website that explain the rationale behind the updates.

## Uploading and watching content

TikTok categorises its users by age, and this determines the features they have access to and the type of content they can see

- 6.45 The VSP Regime requires TikTok to protect under-18s from restricted material<sup>35</sup>. TikTok groups users under the age of 18 into two categories: users aged 13-15 and users aged 16-17. TikTok was one of two platforms to tell us it does this.
- 6.46 TikTok told us that its general approach is to implement various measures for under-18s, and then to further consider the two different age groups (13-15 and 16-17) for certain measures. TikTok will then shape the user experience according to the age category that the user belongs to. This results in younger users having increased privacy and less access to potentially risky features.
- 6.47 The age category will also influence the nature of the content eligible for a user's For You feed. Some types of content are considered 'Ineligible for the For You feed', and therefore not in the For You feed of under-18s. It is not clear from TikTok's response whether under-18s can still view this content if they search for it.
- The types of content that are not prohibited from the platform entirely but may be unsuitable for under-18s include content featuring dangerous stunts and sports, regulated goods such as alcohol or tobacco, violent and graphic content, and overtly sexualised content, and misleading content. Any content uploaded by users under the age of 16 is also not eligible for recommendation.
- 6.49 However, this grouping is based on the date of birth entered by users when they register, which could be falsified. Yonder research commissioned by Ofcom showed that a third of social media users aged 8-17 with their own profile have a user age of at least 18. 32% of children aged 13-15 with their own profile said they used an older date of birth when creating their profile on TikTok.<sup>36</sup>

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<sup>&</sup>lt;sup>35</sup> Restricted material refers to videos which have or would be likely to have an R18 certificate, or which have been or would likely be refused a certificate.11 It also means other material that might impair the physical, mental or moral development of persons under the age of 18.

<sup>&</sup>lt;sup>36</sup> Children's Online User Ages Quantitative Research Study (ofcom.org.uk)

- 6.50 TikTok relies on its own moderation systems and processes to identify content that may be unsuitable for under-18s, rather than allowing uploaders or viewers to apply these ratings. For example, TikTok uses a profanity indicator to filter out mature content that features on under-18s' For You Feed. It uses also uses a variety of other indicators to classify content into three age categories, including content appropriate for users aged 13-15, 16-17, and users aged 18+.
- In July 2022, TikTok began to implement the first phase of its content classification system, which sorts videos into content levels based on thematic comfort levels. The initial rollout encompasses content that does not violate Community Guidelines but is considered to be suitable for users aged 18+. Such content is not recommended to under-18s and they will not be able to search or view the content, even if it is shared with them. If under-18s attempt to view this content, they will be informed that the content is unavailable as it is age protected.

The Family Pairing Feature provides the option to apply parental controls

- 6.52 TikTok launched its Family Pairing feature in April 2020. Once enabled, this feature allows parents and guardians to link their account with their child and take certain decisions regarding their child's use of the platform, though TikTok does not verify that the 'parent' does in fact have parental responsibility for the child. Under-18 users can disable Family Pairing at any time, at which point the parent would be notified of this.
- 6.53 TikTok did not provide evidence to support the effectiveness of its parental control systems. Yonder research commissioned by Ofcom showed that 41% of parents have never used parental controls on TikTok, despite being aware of them.<sup>37</sup>

Figure 6.4: TikTok Family Pairing features

Feature	Description
Screen Time Management	Enables a guardian to set a limit (between 40 and 120 minutes) on how long their teen is able to spend on the platform each day. If a teen wishes to use the platform outside of the allotted time, the guardian is required to enter a passcode.
Restricted Mode	Enables a guardian to turn on Restricted Mode. Restricted Mode limits the visibility of any content that contains a warning notice in their child's For You Feed, which means the child can only view videos that have been subject to several rounds of content moderation.
Search	Enables a guardian to turn on or off a teen's ability to use the search function, where they would otherwise be able to search for content, users, hashtags, and sounds.

<sup>&</sup>lt;sup>37</sup> VSP Parental Guidance Research 2022 (ofcom.org.uk)

Direct messages	Users become eligible for using the direct messages feature at 16. Through Family Pairing, a guardian can turn on or off the ability of a teen over-16 to direct message friends.
Privacy settings	<ul> <li>Enables a guardian to choose the following privacy related settings:</li> <li>To choose if their teen's account is public or private</li> <li>To choose if other users can see their teen's 'liked videos'</li> <li>To choose if their teen's account could be suggested to other users</li> <li>To limit who is allowed to comment on their teen's videos.</li> </ul>
Dashboard	Where enabled, a teen is given access to a dashboard where they can see the choices made by their guardian. They cannot change the individual settings selected by their guardian but can disable Family Pairing at any time.

TikTok cited several other sources it has considered when seeking to design an age-appropriate experience

- 6.54 TikTok did not tell us the types of profanity that would be permitted under each age classification. However, it told us it considered the most recent Ofcom commissioned report into offensive language on TV and Radio when designing the classification system.
- 6.55 TikTok said it considers the <u>ICO's guidance on Age and Developmental Stage</u>s and has produced its own internal guidance on age-appropriate design. Its internal guidance is intended to be followed by Product Feature teams to support the integration of child safety into the design process.

TikTok uses video content, off-platform resources, and offline initiatives to improve the media literacy skills of its users

- 6.56 TikTok told us it uses videos to improve its users' understanding of potential harms that may be encountered and the safety measures available to protect users from those harms. For example, the 'TikTok Tips' page promotes a range of short videos on topics such as critically engaging with content by questioning the source, graphics, and users' own bias, the difference between fact and opinion, and encouraging users to reflect on when it is appropriate to share or report content.
- 6.57 In addition to its own video campaigns, TikTok has collaborated charities and prominent content creators to produce and promote videos on a broad range of online safety issues. These resources aim to raise user awareness about reporting and comment filtering tools, inform users what happens once content is reported and how the feed works, inform users around setting privacy levels and how to create a more secure safe password, and help users recognise when they are spending too much time online.
- 6.58 TikTok reported on user engagement with three of the media literacy campaigns run in 2021. The data provided indicate that:

- a) The #SaferTogether video campaign on online safety received views from approximately 9.4m viewers in the UK, with a further 1.07 million user engagements. It is reported to have resulted in an 8% rise in user familiarity with TikTok Safety measures and facilitated increased traffic directed towards safety measures such as the Digital Wellbeing section (19% increase), Screen Time Management (53% increase), Comment Filters (5% increase), and switching on the Private Account setting (5% increase);
- b) The #FactCheckYourFeed campaign received 15 million viewers, including over 550 thousand visits to a dedicated #FactCheckYourFeed media literacy hub where users were reported to have spent four times as much time engaging;
- c) The #SwipeOutHate campaign received 9.4 million views and over 200 thousand engagements in the UK on a single day.
- 6.59 In addition to its video campaigns, TikTok reported several off-platform media literacy tools hosted on its safety center, help center, youth portal, and shared in newsroom posts. These resources range from guides for parents/caregivers on privacy controls and information on how to report harmful material to safety information for under-eighteens on interacting with users and managing suspicious follow requests.
- 6.60 The platform is also involved with offline media initiatives which entail collaboration, information-sharing and discussing best practice with external stakeholders and partners.
  - a) TikTok partnered with Internet Matters to develop Parental Controls and Privacy Setting Guides, running focus groups with parents/caregivers and teenagers to understand how best to address conversations about online safety, and developing a guide to TikTok for teachers and educators.
  - b) It also told us it partnered with the South West Grid for Learning (SWGfL) to develop a TikTok Guide with Media Smart to inform under-18s, their parents, guardians, and educators on how advertising works on TikTok.
  - c) TikTok has joined DCMS's Media Literacy Steering Group and is participating in Ofcom's Making Sense of Media (MSOM) Network to share insights and engage on best practices for media literacy.

TikTok takes steps to promote users' awareness of media literacy tools and information

- 6.61 TikTok encourages users to report or flag content on the platform, for instance by providing information in the Help Center, Safety Center, and various video series with instructions on how to report harmful content. It also uses real-time in-app feedback after a user reports content.
- It also promotes content to raise under-18 users' awareness of media literacy tools and information on the platform. These users are presented with a Privacy Highlights for Teens video series as part of the registration process which are displayed when under-18 users subsequently open the mobile application.

## Research commissioned by Ofcom shows that adults are broadly supportive of age verification measures

Ofcom has published the findings of research we commissioned which looks into adult internet users' attitudes towards age verification<sup>72</sup>. Participants:

- told us that they were broadly supportive of age verification measures to prevent under-18s from accessing pornography.
- accepted age verification measures where they were expected. For example,
  participants said that they accept the requirement to verify their age whilst purchasing
  alcohol online or participating in online gambling.
- expressed greater willingness to verify their age to access pornography if they were
  creating an account or subscribing to a creator to access content. In contexts when
  they were paying to access pornography, using a credit card was their preferred means
  of age verification.
- had serious concerns about how their data may be processed and/or stored whilst
  verifying their age to access pornography. This was reflective of a very low level of
  trust in the practices of adult sites.
- said that these concerns could be addressed by increased transparency about how
  their data would be used, stored, and deleted; a range of options of methods to verify
  their age; and potentially independent third-party providers performing the age check,
  rather than the adult sites themselves.

## There may be a heightened risk of adult VSPs hosting child sexual abuse material

Child sexual abuse material (CSAM) $^{73}$  is one of the most serious harms that the VSP Framework protects against, with a requirement to protect **all users** from it. Ensuring that platforms are working to keep this content off their services is a priority area of Ofcom's VSP work.

Research suggests that **youth-produced** or **'self-generated' sexual material of under-18s** (sometimes referred to as 'sexting', 'nudes', or 'nude selfies') is an increasingly significant driver of harm. We refer to this material as 'self-generated CSAM' in this report.

Of the 252,194 webpages that the Internet Watch Foundation (IWF) $^{74}$  actioned in 2021, it assessed almost three quarters (182,281 or 72%) as containing self-generated CSAM – this is an increase of 163% compared with the same figure for 2020. For the first half of 2022, the IWF reported a further 360% growth in the amount of self-generated CSAM of 7 to 10-year-old children compared to the same period in 2021. At 19,670 webpages, this is an increase of almost 8,000 pages.

<sup>&</sup>lt;sup>72</sup> Adult Users' Attitudes to Age Verification on Adult Sites Research, 2022 (ofcom.org.uk)

<sup>&</sup>lt;sup>73</sup> CSAM is classed as relevant harmful material and includes any material which shows the sexual abuse of a child. Under the VSP Framework the definition of CSAM covers the depiction of any person appearing to be a child, as well as realistic images of CSAM (such as computer-generated content) and simulated activity

 $<sup>^{74}</sup>$ The IWF is a non-profit organisation that aims to remove online CSAM content through a combination of technology tools and human analysts.