



Deputy Catherine Curtis
Children, Education and Home Affairs Scrutiny Panel
States Greffe
Morier House
St Helier
Jersey
JE1 1DD

11/06/2025

RE: Protection for children in Jersey, Channel Islands, from 'online harms'

Dear Deputy Catherine Curtis,

Thank you for your letter regarding the protection for children in Jersey from online harms.

TikTok is a global, short-form video platform that provides its users with a vibrant, creative experience in a fun and safe environment. Our mission is to inspire creativity and bring joy. For TikTok, creative ideas matter more than social connection, and people on the platform are celebrated for being their authentic selves. The content tends to be light-hearted, authentic, real, heart-warming and truly fun but can also serve to educate our user community about the diverse range of issues of importance to them.

We want to ensure that we create a safe, trustworthy environment in which users can create, discover and enjoy content. There is no finish line when it comes to protecting the TikTok community. We work each day to learn, adapt, and strengthen our policies and practices to keep our community safe. We are committed to working collaboratively with industry peers, regulators, and key stakeholders as part of this process.

We hope that our submission assists the Panel in building understanding of TikTok's trust and safety work, and how we apply our principles and to these important issues at both a global, and local, level.

- 1. We understand that TikTok's services may recognise or adapt to users' geographical locations to provide a localised experience. Could you confirm whether this is the case and, if so, particularly in regard to age verification, moderation, and content access explain how users in Jersey may experience differences compared to users in jurisdictions such as the UK?**
- 2. Are Jersey-based users subject to the same content policies, moderation practices, and community guidelines as users in the UK? If there are any variations, could you please clarify what these are?**

TikTok's approach to content safety is underpinned by our [Community Guidelines](#), alongside our [Terms of Service](#), which govern what is and is not allowed on TikTok. These contain strict rules to protect our community from harmful content, and are set at a global level. All users are subject to

our Terms of Service and Community Guidelines, regardless of where they are based. As such, the current user experience for individuals based in Jersey, including users aged 13-18, is the same as other regions like the UK.

TikTok Terms of Service

Our [Terms of Service](#) are the contract between TikTok and its users. Users must agree to our Terms of Service when they register for a TikTok account. Users are also required by our Terms of Service to comply with our Community Guidelines, and explicitly prohibit the use of the platform to:

- do anything illegal (this includes posting, live streaming or distributing illegal content);
- do anything that violates applicable anti-money laundering, counter terrorist financing, export controls and economic sanctions laws or regulations;
- constitutes, encourages or provides instructions for a criminal offence, or dangerous activities that may lead to serious injury or death or self-harm;
- contains a threat of any kind or which intimidates or harasses others, including posting any material that is intended to mock, humiliate, embarrass, intimidate, or hurt an individual;
- contains or promotes violence or discrimination based on race, ethnicity, national origin, religion, caste, sexual orientation, sex, gender identity, serious disease, disability, immigration status or age

Our Terms of Service also reserve the right to temporarily or permanently suspend or terminate a user account or impose limits on or restrict access to parts or all of the service with or without notice at any time for any or no reason including:

- “if we reasonably believe you violate, or we have objective grounds to reasonably believe they are about to violate, the Terms, including any incorporated agreements, policies or guidelines (such as our [Community Guidelines](#)), or any applicable laws or regulations”;
- “in response to requests by law enforcement or other government agencies under valid legal process”.

TikTok's Community Guidelines

Meanwhile, our [Community Guidelines](#) reflect our values and establish the standards we expect our community to adhere to in order to create a welcoming, safe, and entertaining experience. Our Community Guidelines apply to everyone and everything on our platform. They include rules for what is allowed on TikTok, as well as standards for what is eligible for the For You feed (FYF), which is the main way users consume content on TikTok.

TikTok's Community Guidelines are developed in consultation with experts, academics, NGOs and regulators, as well as taking into account international principles and agreements such as the UN Convention on the Rights of the Child or the Santa Clara Principles. In addition, TikTok also takes a local approach, to ensure local social values, cultures and harms are reflected in the way our policies are enforced.

We carefully review feedback from users and from our moderators, as well as quantitative information related to the application of our policies, in order to continuously improve these policies.

We also frequently review our policies and enforcement criteria to check their effectiveness, to test moderators' understanding and assess fairness to users.

The Community Guidelines outline the range of safety approaches we use to strike the right balance balancing creative expression and preventing harm in accordance with our [Community Principles](#). Our safety approach is broadly focused on:

1. **Removing content that is prohibited from the platform** - we remove content, whether posted publicly or privately, when we find that it violates our rules.
2. **Restricting content that is not suitable for younger users** - we recognise that content allowed on our platform may not be suitable for all users, and as such restrict some content so that it is only viewed by adults.
3. **Making ineligible content for the For You Page** - not all content is appropriate to be recommended, and content that does not meet our standards will be ineligible for the FYP.
4. **Empowering users to shape their experience** - we enable users to filter out content and keywords they don't wish to see on their feed, even if it abides by Community Guidelines and our wider eligibility standards.

We recognise that some content that would otherwise violate our rules may be in the public interest to view. Public interest refers to topics that inform, inspire, or educate the community and enhance deliberation about matters of broad collective significance. We may still add extra safety measures to some content allowed under a public interest exception, such as making it ineligible for the FYP or adding a label, "opt-in" screen, or warning information. Our public interest exceptions include:

- Documentary
- Educational
- Medical and Scientific
- Counterspeech
- Satirical
- Artistic

We always look for opportunities to help users better understand our unique rules. We believe the more [transparent and accessible](#) our policies are, the less people violate them, and the more people can create and be entertained on TikTok. As such, we provide a range of resources available in-app (via the Settings and Privacy section) and on our website, including media literacy tools and resources to keep our users safe and informed. These are brought together in our [Safety Centre](#), which provides information and advice on our safety features and measures.

We have also created short-form video series, involving several of our most popular creators, to educate users about safety in the TikTok format they're most accustomed to viewing. The videos can also be accessed directly in-app [@TikTokTips](#). These videos reinforce our Community Guidelines and offer users mini 'how to' tutorials on key features.

In addition, when a creator violates our Community Guidelines for the first time they receive a "warning strike". We notify creators about which rule they've broken and provide further information on the rule, as well as how they can appeal if they believe a mistake has been made.

Age restrictions and FYP eligibility

TikTok has also been developing an innovative additional layer of content filtering known as "Content Levels". Content Levels work by organising videos into four levels based on "thematic maturity", similar in nature to film and television ratings, but applied at a global scale for an international audience.

Videos which contain mature material, but do not violate our guidelines and are therefore still permitted on the platform, are classified as the the highest Content Level "CL4". Teen users are automatically opted out of CL4 videos, meaning they cannot view any videos of this level which are shared with them, cannot access them through the search bar, and are not recommended to them on their For You Page.

As highlighted, we also maintain restrictions and eligibility standards based on the type of content and the age of the user. For younger users we do now allow them to access content which:

- shows activity that involves visible or imminent moderate physical harm, or promoting activity that is likely to lead to moderate physical harm
- shows activity that is likely to be imitated and may lead to any physical harm
- shows human or animal blood
- shows extreme physical fighting
- shows graphic or potentially distressing footage of events that are in the public interest to view, such as clashes with law enforcement or the aftermath of a bombing or natural disaster

We make ineligible for the FYP, and may also make harder to find in search, certain content that may not be suitable for a broad audience, including:

- any content created by an account holder under 16 years old
- some content that uses stereotypes, insinuation, or indirect statements that may implicitly demean protected groups
- content showing activity that involves visible or imminent moderate physical harm, or promoting activity that is likely to lead to moderate physical harm
- Content showing:
 - Human or animal blood
 - Extreme physical fighting
 - Graphic or potentially distressing footage of events that are in the public interest to view, such as clashes with law enforcement or the aftermath of a bombing or natural disaster
 - Fictional graphic violence
 - Potentially distressing material that may cause anxiety or fear, such as showing non-severe injuries and accidents, dead animals, jump scare effects, or gory make-up

3. **If a Jersey-based user reports a problem in relation to content or a user account to TikTok, is the legislative framework of their jurisdiction (i.e. Jersey) taken into account in how your organisation handles or prioritises the response to the user's report?**

4. **Would users in Jersey potentially be able to access content that has been restricted or removed under the requirements of the OSA or DSA in other jurisdictions, due to Jersey not being subject to the same legal frameworks?**
5. **To what extent do TikTok's policies on acceptable use, harmful content, and protection of minors align with the standards set out in the UK's OSA or the EU's DSA? Which version or standard of these policies is applied to users based in Jersey?**

It is important to note that TikTok's Terms of Service and Community Guidelines often exceed legislative requirements. TikTok is a newer platform than many of the traditional social media companies and as such, many aspects of the platform's design, policies and approach are aligned with those of international legal frameworks such as the Online Safety Act and Digital Services Act.

For example, TikTok takes an age-appropriate, graduated experience to its service. Users aged 13-15 have a different experience to those 16-17, and those who are over 18. For example, users under 16 are prohibited from accessing direct messages. Users 16-17 are able to access direct messages, but they are turned off by default. Other features like the ability to livestream are prohibited for all users under 18.

These features, alongside industry leading measures like a default 1 hour screen time limit for under 18s, and wellbeing tools including [guided meditation](#), are part of the default TikTok experience for minors.

TikTok's Trust and Safety teams use a mixture of advanced moderation technology and human review to ensure we consistently enforce our policies to detect and remove harmful misinformation, undisclosed synthetic or manipulated media, and hateful content. All content on TikTok is reviewed by our automated moderation systems when uploaded, and escalated for human review if potential issues are identified.

In addition, content can undergo review multiple times. Our systems are built to mitigate potential risk of exposure to harm. As content becomes engaged with more, or is reported, it undergoes additional rounds of review to ensure potentially harmful content is identified and removed.

As detailed in our Quarterly Transparency Report, in Q4 2024 TikTok removed over 150 million videos, with 98.5% being removed proactively (i.e. before they were reported to us) and 90.8% being removed within 24 hours. 83.2% of content removed was done so before it was seen by a single user, and 98.1% removed before it was seen by 1,000 users.

In addition, TikTok does include a reporting feature that enables users around the world to report inappropriate content or behaviour they might be concerned about. Users can report content (such as videos, comments, audio, direct messages or a user's profile) if they believe it violates our Community Guidelines. In Q4 2024, we responded to user reports within 2 hours for 83% of cases, and within 24 hours in 99.7% of cases.

We have tens of thousands of safety professionals based around the world to help us swiftly identify and accurately review content. Our Trust and Safety teams work on a 24/7 'follow-the-sun' basis to ensure the safety of our users and the integrity of our platform with Trust and Safety Hubs in Ireland, Singapore and the USA. Based on their expert assessment, content may be removed, restricted from

<18s or made ineligible for FYP.

We continue to invest in our moderation and risk analysis capabilities to ensure the integrity of the information ecosystem on TikTok, including around election content. In 2024, we invested over \$2 billion in our Trust and Safety efforts.

Safety by design and user empowerment

We always look for opportunities to help users better understand our unique rules. We believe the more transparent and accessible our policies are, the less people violate them, and the more people can create and be entertained on TikTok. As such, we provide a range of resources available in-app (via the Settings and Privacy section) and on our website, including media literacy tools and resources to keep our users safe and informed. These are brought together in our [Safety Centre](#), which provides information and advice on our safety features and measures.

We have also created a short-form video series, involving several of our most popular creators, to educate users about safety in the TikTok format they're most accustomed to viewing. The videos can also be accessed directly in-app [@TikTokTips](#). These videos reinforce our Community Guidelines and offer users mini 'how to' tutorials on key features.

In addition, when a creator violates our Community Guidelines for the first time they receive a "warning strike". We notify creators about which rule they've broken and provide further information on the rule, as well as how they can appeal if they believe a mistake has been made. Over 60% of people who receive a first warning for violating guidelines do not have a second violation. Zero-tolerance policies (for example, incitement to violence) aren't eligible for these reminders; accounts will immediately be banned.

We also implement a range of different interventions across the app to improve the user experience, educate users and mitigate the risk of harm. This includes:

- **Warning notices:** We surface warning notices to users on videos containing behaviour or material that may lead to physical safety risk if imitated.
- **In app notices:** We may use in-app notices to protect users from potentially harmful content.
- **Search results:** We take a number of measures to protect users from videos containing potentially harmful material in search results, including blocking various search terms associated with harmful material, referring users to authoritative sources and downranking certain accounts.

Where possible, we partner with local organisations to direct users to the most relevant and authoritative information available to them. We also work with global partners to ensure that all users, regardless of location, are able to access authoritative information. For example, during the COVID-19 pandemic, our search interventions and in-app notices directed users to guidance from the World Health Organisation.

6. **How would TikTok respond to the introduction of Jersey specific legislation concerning online safety, content moderation, and the protection of minors?**
7. **Are there any particular challenges that TikTok foresees in adapting to**

legislation passed in smaller jurisdictions such as Jersey?

TikTok is fueled by the creativity of our community, and we work to enable and protect authentic self-expression and entertainment.

TikTok supports a harmonised approach to regulation, which aligns as much as possible across jurisdictions and provides a clear set of regulatory standards for services as well as users. Creating unnecessary duplication and fragmentation of regulation increases the complexity and burden for both service providers and consumers. Such a fragmented approach could result in confusion and a lack of clarity, which would lead to inefficiencies and undermine the policy intent and shared goal of ensuring online safety.

By their nature, online harms exist across borders. While online safety is not a new phenomenon, there has been an increase in specific regulations over recent years and many services, including TikTok, have been working hard to ensure these are implemented in a way that ensures the best interests of our users, to make sure they are protected and that measures are effective at mitigating the specific risks applicable to our platform. It is important any regulatory framework leverages the important work that has already been done by industry to protect users from online harms.

While these principles are important, TikTok abides by local laws in the markets that it operates in. There may be situations in which government authorities believe content on TikTok violates local law or regulations that may have been passed. We recognise that in these circumstances authorities may ask us to remove or restrict content for this local law violation, which we call “government removal requests” and provide a dedicated mechanism for them to raise these concerns, outlined below.

As per our [human rights statement](#), TikTok is committed to protecting the freedom of expression, privacy, and other rights of its users. In some situations, local laws may conflict with international human rights standards. When presented with these cases, our commitment to human rights principles remains and we seek to uphold our users’ rights. To do this, we assess the validity of the government request that is in conflict and interpret it as narrowly as possible. In cases where we believe this is insufficient to respect our users’ rights, we will explore legal means to push back against requests that may undermine international law and international human rights standards.

In addition to these Guidelines, TikTok has internal policies and procedures governing how TikTok handles and responds to government removal requests. These procedures are informed by legal and human rights standards and have been developed in a way that seeks to limit adverse human rights impacts, while enabling TikTok to comply with legitimate and valid legal requests from a government authority. Requests that do not meet these criteria will be rejected.

We have an established process in relation to requests that relate to local law violations:

- **Step 1: Intake of government removal request from government authority / regulator:** When relevant government authorities, such as regulators, believe content on TikTok violates local laws, they may ask us to remove or restrict that content.
- **Step 2: Policy review against TikTok’s policies:** The next step is for the content to be reviewed against TikTok’s Community Guidelines or other policies as relevant, such as

TikTok's Advertising Policies. If we determine that the content violates our policies, and it is removed globally as part of this step, this brings the review process to an end (without the need for further steps). A response is sent to the relevant authority informing them of the action taken, and users are notified of the action taken.

- **Step 3: Legal assessment:** If the content is not found to violate TikTok's policies, the next step is to conduct a legal assessment of the government removal request. This involves assessing whether the request is procedurally valid and whether the reported content violates local laws. Based on the outcome of the legal assessment, we may reject the request and inform the relevant government authority that no action has been taken, or we may request additional information. Where appropriate, we may also challenge a request through available legal processes. We also consider whether the request may give rise to potential material human rights concerns.
- **Step 4: Human rights assessment:** Where potential material human rights concerns are identified, our teams undertake a human rights assessment of the request. To do this, we assess the validity of the government request that is in conflict, and we seek to interpret it as narrowly as possible in line with the following key principles:
 - **A. International human rights standards:** As well as the local legal assessment (in Step 3 above), we consider whether the relevant law is consistent with international human rights standards (such as the rights to freedom of expression, privacy, and non-discrimination as protected under the [International Covenant on Civil and Political Rights](#)).
 - **B. Legitimate aims:** We consider whether the purpose(s) of the removal request is consistent with the legitimate aims listed under international human rights law (such as the [International Covenant on Civil and Political Rights](#)). For example, to justifiably restrict freedom of expression, such aims include: "*respect for the rights of others, protection of national security, public order, public health or morals*".
 - **C. Necessity and proportionality:** This involves applying a necessity and proportionality test to assess whether the measure contained in the removal request is strictly necessary and proportionate in the circumstances. In line with our [human rights statement](#), we seek to interpret the requirements under any removal request as narrowly as possible. We take account of a range of factors to assess whether we think the measure is justified under international human rights law and to implement any restriction in the least restrictive way.
 - **D. Other relevant factors:** During the assessment process, various internal teams collaborate and may flag additional factors or risks. Such factors/risks may include, but are not limited to: other relevant human rights concerns; regulatory risks involving a ban or inability to operate the platform in a country (thus impacting people's rights in that country more widely); regulatory fines; and/or risks to physical safety.
- **Step 5: Take action and close the case:** Based on the above assessments, we determine whether and to what extent we should remove the content in question. If we take action based on a removal request based on a violation of local laws, we restrict access to the content only in the jurisdiction where it is alleged to be unlawful. Limited exceptions may apply, for example, where justified based on legal and safety grounds.

We will issue a response to the relevant government authority and may also notify the impacted user of the action taken (e.g. where required or permitted to do so).

We believe that transparency is also an important aspect when it comes to not just our Community Guidelines enforcement, but other local law violations as well. In our [Government Removal Requests Reports](#), we provide insight into the volume of government removal or restriction requests we receive and the nature of TikTok's response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ben Bradley', with a stylized, flowing script.

Ben Bradley
Senior Public Policy and Government Relations Manager

