



28 May 2021

Office of the United Nations High Commissioner for Human Rights (OHCHR)
Palais des Nations
CH-1211 Geneva 10
Switzerland

Dear Special Rapporteur Singhateh, Chair-Rapporteur Pesce, Special Rapporteur Boly Barry, Special Rapporteur Obokata, Special Rapporteur Mullally, Special Rapporteur Simonovic, and Chair Rapporteur Broderick,

Please accept this response to your 30 March 2021 letter to TikTok (reference AL OTH 20/2021) regarding your concerns over content created on Omegle being shared on our platform, and Omegle's potential to facilitate the spread of child sexual abuse material (CSAM). We appreciate the opportunity to address these allegations and provide more information about TikTok and our efforts.

Although much of the content found on TikTok is fun and lighthearted, we recognize the immense responsibility entrusted to us, as well as the impact of our app on our community of users. TikTok is firmly committed to protecting the safety of its community, especially our younger members. We take a zero-tolerance approach to all forms of child sexual exploitation and abuse (CSEA), including CSAM.

Our Community Guidelines¹ define a set of norms and common code of conduct; they provide guidance on what is and is not allowed on TikTok in order to create a welcoming and safe space for entertainment. The Community Guidelines are in place to help protect the safety of our community and ensure that we take action on content in a transparent and equitable manner. Our Community Guidelines apply to everyone and to everything on TikTok, and we will remove any content – including video, audio, livestream, images, comments, and text – that violates our Community Guidelines.

TikTok neither encourages nor endorses the use of third party apps, including Omegle. TikTok is in no way affiliated with Omegle, does not encourage its use, and has no visibility into the activities of Omegle or the content found on the Omegle platform. The troubling activities OHCHR describes as having taken place on Omegle would violate the TikTok Community Guidelines and not be allowed on our platform.

Earlier this year, TikTok's trust and safety team conducted an investigation into Omegle-related content and took action against content that violated our Community Guidelines. Our internal investigations have shown that there is no material correlation between content referencing Omegle and an increase in CSAM on the TikTok platform. Although we found that content referencing Omegle did not trigger a detectable difference in our child-safety monitoring metrics, we will continue to place special attention on violative content associated with the term "Omegle".

We disagree with your conclusion that TikTok has promoted Omegle's popularity. Content related to Omegle can be easily found on a wide variety of social media and entertainment platforms. In addition, we would like to clarify that TikTok is a global platform, with offices, teams, and leadership around the world, primarily in the US and Singapore. The TikTok app is not available in China.

Our detailed responses to your questions are attached. Please do not hesitate to contact me should you have any questions regarding our responses or if you would like additional information. We welcome the

¹ <https://www.tiktok.com/community-guidelines?lang=en>

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opportunity to continue this dialogue and work with the Special Rapporteurs and the Working Group in addressing these important issues.

In addition, although we cannot safely welcome in person visitors to our Transparency and Accountability Center at this time, I would like to invite you to join us for a virtual tour to learn more about our platform and all the important work we do to keep our community safe.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vanessa Pappas', enclosed within a light yellow rectangular border.

Vanessa Pappas
COO, TikTok Global

This attachment is TikTok's response to the letter dated 30 March 2021 from the Special Rapporteur to TikTok, forwarded by the Office of the United Nations High Commissioner for Human Rights (OHCHR).

TikTok is a global platform, with offices, teams, and leadership around the world. Its mission is to inspire creativity and bring joy. The video content found on TikTok is created by members of our community who innovate and share, discover the world around them, and connect with others across the globe. Protecting our TikTok community – with a special emphasis on protecting minors on the platform – is a commitment that is vital to our organization.

TikTok does not encourage the use of third party apps, including Omegle. TikTok is not affiliated with Omegle or other chat roulette apps, and we do not control the Omegle app or its distribution through the app stores. Additionally, TikTok does not provide input on nor monitor the moderation practices or account verification practices of third party apps.

The below responses focus on the use of the TikTok platform, which is the only activity to which we are able to provide helpful information.

1. Please provide any additional information and any comment you may have on the above-mentioned allegations.

TikTok treats child safety matters with the utmost seriousness, and we find the allegations set forth in the Special Rapporteur's letter highly concerning. However, TikTok disagrees with a number of the assertions in the letter and appreciates the opportunity to provide additional information.

TikTok continually monitors, updates, and reinforces our efforts to stop the creation and sharing of child sexual abuse material (CSAM). TikTok has a dedicated investigations group within our trust and safety team focused on detecting emerging trends and patterns as part of our efforts to keep our platform safe. One such trend investigated by our team (which we note occurred even before TikTok became aware of the OHCHR's concerns) was focused on Omegle content.

Our safety team investigated Omegle content in February 2021. The investigation selected a representative sample of TikTok videos with the hashtag #omegle that were marked as violations of our minor safety and bullying and harassment policies. The findings of our investigation demonstrate that Omegle-related content did not cause a spike in CSAM on the TikTok platform, and the vast majority of content referencing Omegle did not endanger children or otherwise violate TikTok's safety policies. Three percent of the violating videos sampled were tagged with a policy title leading to escalation to our Law Enforcement Response Team for further review as potential CSAM or predatory behavior. We concluded that this content did not violate our minor safety policies, but rather tended to violate our hate speech or bullying policies. Nonetheless, as a result of the investigation, we took a series of affirmative actions to mitigate any potential harms associated with this content on TikTok.

As a result of our investigation, TikTok promptly took the following actions:

- Links to Omegle were removed from profiles; new attempts to add such links were blocked.
- Despite the extremely small volume of violative content associated with the hashtag #omegle, out of an abundance of caution we made such content ineligible for recommendation to users across all global markets.
- Enhanced guidance has been provided to our content moderators to empower them to accurately screen for solicitation or pedophilia when Omegle content is in a video.
- Searches for "Omegle" and variants are restricted from appearing in auto-complete searches.
- Our team prioritizes monitoring the hashtag for the types of content and any associated policy violations.
- Developed a policy against leading minors off platform. This policy is designed to identify and remove content that leads or encourages minor users to go to third party sites or apps, including to Omegle.

Our trust and safety team has attempted to learn more about the allegation by the BBC that an eight year-old girl was drawn to Omegle from TikTok. The sources in BBC's article never reported their concerns to TikTok, and we have been unable to locate any information suggesting this activity took place on our platform. If you have any additional information about the child or incident in question, please let us know, and we will investigate further.

We are deeply committed to the safety of our community and will continue to investigate and monitor CSAM and Omegle content to ensure that it complies with our Community Guidelines, which define a set of norms and common code of conduct on the TikTok platform.

TikTok recognizes that coordination among companies and organizations is necessary to effectively identify and remove CSAM. As discussed in more detail below, TikTok has global partnerships to help protect against child exploitation. We actively remove violative content, terminate accounts, and report illegal activity to the National Center for Missing & Exploited Children (NCMEC) and appropriate law enforcement agencies.

- 2. Please provide information as to what human rights due diligence steps, as set forth by the UN Guiding Principles on Business and Human Rights, have been undertaken by your company to identify, prevent, mitigate and account for human rights abuses caused by or contributed to your own activities, or directly linked to your operations, products or services by your business relationships (including abroad). This includes the adverse impact of the services described in this letter regarding the online content hosting websites and applications.**

While TikTok is a young company, it is committed to many of the themes set forth in the UN Guiding Principles on Business and Human Rights and is in the process of evaluating a more formal implementation and endorsement of the Principles. As described in more detail below, we have worked with external stakeholders to hold educational trainings for senior leadership on the UN Guiding Principles on Business and Human Rights and are committed to respecting human rights under the UNGP's Protect-Respect-Remedy framework.

TikTok prioritizes safety, diversity, inclusion, and authenticity. We encourage creators to celebrate what makes them unique and viewers to engage in what inspires them. We believe that a safe environment helps everyone express themselves openly. Our company deeply values the global nature of our community, and we strive to take into account the breadth of cultural norms where we operate. We are also committed to being an industry leader in transparency and accountability. We release regular transparency reports² voluntarily disclosing our content moderation on the platform, and routinely provide public updates on our efforts to continuously improve platform safety.³ TikTok has also built teams focused on responsible innovation, diversity and equity, and brought experts on child safety in house to lead the company's efforts. We have also opened our doors with our Transparency and Accountability Centers⁴. While public health concerns have necessitated moving these tours online during the COVID-19 pandemic, we continue to offer virtual tours to share information about how we moderate content and keep the platform safe and secure.

TikTok also prioritizes transparency and accountability in connection with our election integrity efforts.⁵ While TikTok is not the go-to place for news and politics, it is critical that we focus on protecting our platform from misinformation, disinformation, and foreign interference. For example, in connection with the 2020 elections in the United States, we set up a dedicated page on our Safety Center to increase visibility on how we work to keep our community safe from content that may be inauthentic or misleading.

² <https://www.tiktok.com/safety/resources/transparency-report-2020-2?lang=en&appLaunch=%20>

³ <https://newsroom.tiktok.com/en-ie/safety>

⁴ <https://www.tiktok.com/transparency?lang=en>

⁵ <https://newsroom.tiktok.com/en-us/increasing-transparency-into-our-elections-integrity-efforts>

The page also included a log where we regularly provided updates on steps we were taking to protect the integrity of our platform and the 2020 elections. We launched an in-app election guide that provided accurate information and educational resources for our users and consulted with a variety of experts to strengthen our efforts to protect against harm and misuse on our platform. TikTok continues to seek opportunities to provide similar election information in other markets.

TikTok also takes seriously our users' ability to express themselves safely and continuously works to counter the spread of hateful speech, behavior, and groups on our platform. As detailed in an August 2020 blog post,⁶ TikTok takes a proactive approach to stopping the spread of hate and known hate and violent extremist groups on our platform. We work to proactively detect and remove such content before it reaches our community, and we carefully review content our community reports to us. Furthermore, we regularly consult with experts to help our policies evolve as hateful behavior itself evolves. We periodically train our enforcement teams to better detect evolving hateful behavior, symbols, terms, and offensive stereotypes.

Additionally, TikTok has endorsed implementation of the Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse,⁷ which offers a framework that can be consistently applied across digital sectors and services to respond to changing behaviors and protect young people.

TikTok regularly consults with a myriad of external experts and organizations in order to refine our approach to safety, diversity, and inclusion. NCMEC, the Technology Coalition, Business for Social Responsibility, the Family Online Safety Institute, and the Internet Watch Foundation are a sampling of these external partnerships.

- 3. Please provide information on measures taken by TikTok to protect children from sexual offenders seeking to connect with and solicit children for sexual purposes (“grooming”), to view and participate in online child sexual abuse via live video streaming, to distribute child sexual abuse material, including self-generated content produced out of “sexting”, and to commit the sexual extortion of children.**

Our Community Guidelines⁸ make clear what content is acceptable on TikTok, and we enforce those guidelines through a combination of technology and human moderation. TikTok does not tolerate activities that perpetuate the abuse, harm, endangerment, or exploitation of minors, internally defined as any person under the age of 18. Any content, including animation or digitally created or manipulated media, that depicts abuse, exploitation, or nudity of minors is a violation on our platform and will be removed when detected. We have a zero tolerance approach to all forms of child sexual exploitation and abuse (CSEA), and accounts associated with CSEA will be blocked. We report illegal activity to NCMEC and/or other relevant legal authorities.

Technologies and Processes

To support our commitment to safety, particularly for younger users, we use a variety of technologies and processes to detect online grooming of children and protect against CSAM content. As detailed in our most recent Transparency Report,⁹ we proactively identified and removed 97.1% of content that violates our minor safety policy before it is reported to us, and 95.8% of violative content is removed within 24 hours of being posted.

⁶ <https://newsroom.tiktok.com/en-us/countering-hate-on-tiktok>

⁷ <https://newsroom.tiktok.com/en-us/tiktok-supports-and-promotes-the-voluntary-principles-to-counter-online-child-exploitation>

⁸ <https://www.tiktok.com/community-guidelines?lang=en>

⁹ <https://www.tiktok.com/safety/resources/transparency-report-2020-2?lang=en>

Our technologies and processes include:

- TikTok’s **moderation system** uses models to automatically identify videos, captions, and accounts containing CSAM content that is created and uploaded to the TikTok platform. Our moderation system also uses advanced technology to review comments for evidence of online grooming and other predatory behavior.
 - TikTok maintains a sensitive words list that we pair with models to help identify sexual/predatory texts, emojis, and phrases conveying sexual meaning or implying sexual intention. TikTok uses technology to scan for such words in video captions, optical character recognition (OCR) text, comments, direct messages (DMs), audio event detection models, models to detect previously uploaded violative content, text classifiers, as well as keywords searches.
 - Each and every video uploaded to TikTok goes through automated moderation and identified potential cases of CSAM are automatically removed or escalated for human review by a member of our moderation team. Additionally, each video, comment, and account that is reported by a user for reasons relating to child sexual abuse goes through human moderation.
 - We also have classifiers dedicated to identifying problematic accounts and behaviors. These include classifiers that identify potential grooming comments including those requesting personal information or an offline meeting, or indicating online trading of sexually inappropriate minor content. Once those comments are identified by the classifier, they automatically will be prevented from reaching the recipient.
 - Content is also reviewed by TikTok’s advanced technology that is designed to detect child nudity and sexual images.
 - Users who are suspected of engaging in online grooming activities may have their direct messaging or commenting functions disabled or accounts banned and be reported to NCMEC or law enforcement, in line with our legal obligations.
- TikTok does not permit images or off platform videos to be sent in **comments or direct messages**. This means that every piece of content shared on TikTok is subject to our Community Guidelines and goes through our content moderation processes. This was a deliberate decision TikTok made in response to studies that have shown that a proliferation of CSAM is linked and spread via messaging.
- TikTok’s **in-app reporting function** can be used to flag direct messages, comments, accounts and videos showing evidence of online grooming and other predatory behavior. These cases also go to a human moderator for review.
- In order to create an account on the platform, users must pass through the **TikTok age gate**. In most markets, if the person creating an account enters a birthday that states the user is under 13, that person will be blocked from creating an account.¹⁰ In the United States, users entering birthdays showing them to be younger than 13 years of age will be directed into the TikTok for Younger Users experience. If we become aware that someone younger than 13 is on the TikTok app and not in the Younger Users experience, we delete their account.
- TikTok’s range of **privacy settings** allows users to manage who can engage with them and their content. Users can choose to receive messages only from “Friends” (their followers who the user follows back).
- In particular, we provide **heightened privacy settings and product features as the default for teens**:
 - **Accounts Ages 13-15**: These accounts are set to private by default to help these users carefully build their online presence. With a private TikTok account, only someone who the user approves as a follower can view their videos. They also:
 - Can choose between “Friends” or no one when it comes to comment options to limit unwanted to inappropriate comments from anyone.
 - Are unable to use direct messages, livestream, or virtual gifting, as we believe those are more advanced features for an audience at least 16 or 18, depending on the feature.

¹⁰ Age of admission is 14 in Indonesia and Korea.

- Cannot have their content downloaded, “Dueted”, or “Stitched”, and their account will not be suggested to others to further protect their online presence.
- **Accounts Ages 16-17:** We offer people both strong privacy and safety protections by default, but with additional choices over their experience. For instance, Duet and Stitch are set to “Friends” by default to promote positive interactions, and while they have the option to allow others to download their content, it is set to off by default.

We are continually updating our technology to allow us to detect accounts which may be initiating inappropriate sexual interactions with children, and to proactively remove CSAM. Additionally, we regularly and consistently update our moderation processes and procedures for identifying and removing CSAM content. As part of our regular practice, we continuously review the tactics of malicious accounts to further strengthen our systems.

On top of our own technology, TikTok has integrated with NCMEC’s Hash Sharing Web Services to enable the detection and removal of known CSAM at the point of upload to TikTok. The NCMEC hash list is applied against all videos uploaded to the platform and to users’ avatar (profile pictures). This uses the hash format PhotoDNA. This is designed to identify real images as well as pseudo-images. TikTok also uses user GIF avatar frames for hashing and integrating with NCMEC repositior. TikTok also uses Thorn’s database for risky keywords to help block content or enqueue users for account review. Additionally, we are members of the Internet Watch Foundation (IWF) and use IWF’s keyword list to supplement our existing sensitive words list. We also deploy IWF’s URL list to block URLs containing CSAM that are shared through private messages or present in a user’s bio.

We do not allow users who have been convicted of crimes against children to have an account on our platform. If we discover any such users, we ban the account. If any high-risk content violations are detected, TikTok will report the user and content to NCMEC and/or all relevant law enforcement agencies. Pursuant to TikTok policy, any self-disclosed user information that states the account holder is a pedophile or minor sex offender will be taken at face value, and the account deleted.

Our Partnerships

TikTok is continuously working to provide a safe app experience for our community, and we aim to be a leader in this area. We recognize, however, that technology is ever-evolving and that we need to be prepared to address unexpected trends and challenges as they arise, and beyond our efforts with NCMEC, TikTok works with a variety of global partners on these efforts, a sampling of which includes:

- We were recently accepted into the **Technology Coalition**,¹¹ an organization that works to protect children from online sexual exploitation and abuse.
- TikTok is a member of **Business for Social Responsibility (BSR)** and has joined BSR’s Human Rights Working Group. Together with BSR and Article 1 Advisors, we have held educational trainings for senior leadership on the UN Guiding Principles on Business and Human Rights, and are committed to respect human rights under the UNGP’s Protect-Respect-Remedy framework.
- We worked with **Thorn**¹² to launch an in-app campaign called This is NoFltr, which facilitated a conversation between youth and adults on the sharing of nude images and consent. In addition, we worked in collaboration with Thorn researchers and our policy team to inform our policy and features related to their findings.
- **ConnectSafely**¹³ is a nonprofit dedicated to educating users of connected technology about safety, privacy and security. We worked with Connect Safely to develop a TikTok-specific guide for parents and teens.¹⁴

¹¹ <https://www.technologycoalition.org/>

¹² <https://www.thorn.org/>

¹³ <https://www.connectsafely.org/>

¹⁴ <https://www.connectsafely.org/tiktok/>

- **National Parent Teacher Association (PTA)**¹⁵ and TikTok partnered to provide a guidebook for parents¹⁶ to help them learn more about how their teens are using TikTok, educate families about safety on the app, and guide parents in having open, ongoing conversations with their teens to ensure they are using social media productively and responsibly. TikTok also is partnering with the National PTA to donate \$1,000 to 30 local PTAs to help fund critical K-12 programs that support distance learning as well as school meal benefits. The funds equip PTAs with resources to help meet critical needs of students, families, teachers and communities during these times.
- TikTok's Parental Controls guide¹⁷ for the **Family Online Safety Institute**¹⁸ offers information on several tools to help teens manage how they interact with other users and who can see their videos. It includes information about restrictions for privacy, content, comments, and messages.
- **Internet Watch Foundation**¹⁹ is a vital partner for TikTok in our work to counter online child sexual abuse and exploitation. TikTok accesses IWF URL list and, via NCMEC, its hash database of known child sexual abuse images. In addition to its frontline work, IWF provides insight on new and emerging trends and acts a convener for key stakeholders.
- TikTok's membership with the **WeProtect Global Alliance**²⁰ reflects our commitment to working collaboratively with industry partners, key non-profits, academics, and governments to identify, implement and, critically, share innovative solutions to better protect children online.
- **Alliance to Better Protect Minors Online**²¹ is a self-regulatory initiative instigated and overseen the European Commission to improve the online environment for children and young people. Through our membership, we collaborate with the European Commission and industry partners to share best practice safety solutions for children online.
- TikTok supports **INHOPE**,²² a global network of 47 child protection hotlines, in their endeavor to fight CSAM online. TikTok works with several of the local INHOPE hotlines and looks forward to deepening our partnership.
- **SaferNet**²³ is the first-ever NGO in Brazil to establish a multistakeholder approach to protect children and to promote human rights in the digital environment. Since 2005, SaferNet is responsible for the National Hotline, Helpline, and the Brazilian Awareness Hub. SaferNet is an INHOPE partner.
- **The Canadian Center for Child Protection**²⁴ has provided feedback on existing policy and features. We are also supporting their education and outreach initiatives in Canada.
- **Grooming Argentina**,²⁵ which works toward the prevention, awareness, and eradication of grooming in Argentina. We work with Grooming Argentina to spread awareness about risks online, increase digital literacy among parents and youth, and receive reports of predatory behavior.
- **Consejo Ciudadano**²⁶ is a civil society organization that seeks to give citizens a voice on a wide range of safety issues. Together with Consejo Ciudadano, we run campaigns in TikTok to let users know about resources available for mental health challenges.
- **ChildFund Ecuador**²⁷ seeks to protect children in Ecuador, including through combatting online risks. We are working with ChildFund Ecuador to run a study on youth perceptions toward online risks on TikTok and will structure changes to safety information on this feedback.

¹⁵ <https://www.pta.org/>

¹⁶ <https://www.pta.org/docs/default-source/files/programs/pta-connected/tiktok-toolkit-2019-2020/tiktok-guide-for-parents-revised.pdf>

¹⁷ <https://www.fosi.org/good-digital-parenting-tool/tiktok-parental-controls>

¹⁸ <https://www.fosi.org/>

¹⁹ <https://www.iwf.org.uk/>

²⁰ <https://www.weprotect.org/>

²¹ <https://digital-strategy.ec.europa.eu/en/policies/protect-minors-online>

²² <https://www.inhope.org/EN>

²³ <https://new.safernet.org.br/>

²⁴ <https://www.protectchildren.ca/en/>

²⁵ <https://groomingargentina.org/>

²⁶ <https://www.consejociudadanomx.org/index.php/es/>

²⁷ <https://www.childfund.ec/>

- **Fundación PAS**²⁸ counters child sexual abuse through education and empowering families. We are co-launching a parents' guide to TikTok in collaboration with the Foundation.
- **Red PaPaz**²⁹ is a network of mothers, fathers, and caregivers which seeks to generate capacities for an effective protection of the rights of boys, girls, and adolescents in Colombia. We work closely together with Red PaPaz and their reporting hotline to identify problematic content, accounts, and trends on the platform as well as increase digital literacy of parents, teachers, and youth.

We have also established Content Advisory Councils in the US,³⁰ EU,³¹ and APAC region³² (with more to come in Brazil, and Spanish speaking LATAM). These councils allow us to convene experts with diverse perspectives as we navigate a variety of safety challenges.

- 4. Please explain if and how TikTok ensures that reports of sexual extortion of children online, as well as other acts related to producing, distributing, disseminating, importing, exporting, offering, selling or possessing, for the purposes of sexual exploitation child sexual abuse material, including self-generated sexually explicit content, are shared with the relevant national authorities in a lawful manner, and if the provisions of international human rights law are fully respected.**

As stated above, TikTok has a zero-tolerance approach to all forms of child sexual exploitation and abuse. Our Law Enforcement Response Team also reviews and responds in a timely manner to legal process from law enforcement related to potential CSEA investigations, and we comply with preservation notices received from law enforcement.

TikTok recently refreshed and updated the English version of the TikTok Law Enforcement Guidelines³³ on 19 April 2021. The Guidelines provide law enforcement with details on how to collaborate closely with our internal TikTok Law Enforcement Response Team when submitting data disclosure requests. This set of Guidelines also reflect TikTok's commitments to cooperate with law enforcement while respecting our users' privacy in a fair, lawful, and transparent manner.

- 5. Please indicate the steps that your company has taken, or is considering to take, to ensure operational-level grievance mechanisms, or cooperate in the provision of, effective remedies through legitimate processes to the affected victims. In particular, please provide information on effective access to child-friendly, widely available, easily accessible, child- and gender- sensitive and age-appropriate confidential psychosocial counselling and reporting mechanisms, such as online and telephone helplines to facilitate the disclosure of abuse by child victims of sexual abuse, but also to seek advice or help regarding self-generated sexually explicit content.**

TikTok has been working with experts to improve our understanding of sexual assault and trauma and how to foster a safe and supportive space for survivors of all ages. In addition to the minor safety policies discussed above, TikTok strictly prohibits content depicting or supporting sexual violence, including non-consensual intimate imagery, hacked imagery, and attempts to glorify rape and sexual assault. We have also recently refreshed our policies so they create space for survivors to share their story or find community, without fear of further harassment. In order to do that, we strive to consistently and equitably enforce our policies against content that exploits sexual violence or accounts that engage in harassing

²⁸ <https://fundacionpas.org/>

²⁹ <https://www.redpapaz.org/>

³⁰ <https://newsroom.tiktok.com/en-us/introducing-the-tiktok-content-advisory-council>

³¹ <https://newsroom.tiktok.com/en-gb/tiktok-european-safety-advisory-council>

³² <https://newsroom.tiktok.com/en-sg/tiktok-apac-safety-advisory-council>

³³ <https://www.tiktok.com/legal/law-enforcement?lang=en>

behaviors. We are continuing to work with experts to evolve and refine these policies and our enforcement measures.

TikTok provides sexual assault resources³⁴ on our Safety Center³⁵ to connect survivors within our community with help, information, and services. TikTok has partnered with experts at RAINN (Rape, Abuse & Incest National Network)³⁶ to develop this educational content. In the coming months TikTok plans to roll out additional resources in our app to support survivors of sexual assault.

TikTok also provides in-app resources relating to suicide prevention. In addition to tips and support, the app includes links to suicide-prevention hotlines and text lines that are localized to the user's country or region.

6. Please explain what measures have been taken to ensure that your company's staff has adequate awareness, knowledge and tools to identify and report cases of sexual extortion of children online, as well as other acts related to producing, distributing, disseminating, importing, exporting, offering, selling or possessing, for the purposes of sexual exploitation child sexual abuse material, including self-generated sexually explicit content.

TikTok's safety teams are led by industry experts with decades of experience working on safety issues. Additionally, TikTok has brought on global experts to serve as policy leads focused solely on minor safety issues, including research methodologists to develop global minor safety policies and content maturity ratings. These minor safety leads help inform our policies and train our teams.

TikTok's safety and moderation teams receive extensive training during onboarding as well as on-going trainings on new and revised policies. In addition to trainings on our Community Guideline policy areas, we train our moderators on how to responsibly handle user data and personal information. Our moderators focus on specific policy issue areas, such as minor safety. Child safety moderators receive specialized and reoccurring training on TikTok's minor safety policies and playbooks, as well as how to handle CSAM. Members of our Law Enforcement Response Team also receive extensive training, including on requirements and procedures for law enforcement referrals and minor safety matters.

7. Please explain what monitoring and evaluation systems TikTok has in place to ensure the effectiveness of actions taken to mitigate and prevent the allegations mentioned in this letter.

TikTok prioritizes safety and will continue to investigate harms against children, including #Omegle content, to ensure that it adheres to our Community Guidelines. We have carefully reviewed the content on TikTok under #Omegle and associated hashtags and have taken action on all content found to violate our Community Guidelines. In the event we do find violative content, we will remove it, ban the accounts in a manner consistent with our Community Guidelines, and make reports to law enforcement where necessary.

In addition to the actions described above regarding Omegle, TikTok will continue to conduct platform sweeps for related hashtags. TikTok regularly updates its sensitive words list and will continue to monitor for emerging trends in the CSEA space as we learn about them through our partnerships and internal analysis and investigations. TikTok will consider these learnings when product features are under development, as when we disabled direct messaging and livestreaming for our younger users.

³⁴ <https://www.tiktok.com/safety/resources/sexual-assault-resources?lang=en&appLaunch=web>

³⁵ <https://www.tiktok.com/safety/en-us/>

³⁶ <https://www.rainn.org/>