AMNESTY INTERNATIONAL PUBLIC STATEMENT

12 May 2025 ACT 10/9354/2025

TIKTOK FAILS TO ADDRESS RISKS TO CHILDREN AND YOUNG PEOPLE'S MENTAL HEALTH DESPITE PAST WARNINGS

TikTok is failing to address serious risks of harm to young users' mental and physical health almost 18 months after Amnesty International highlighted these risks in a groundbreaking report.

The 2023 research revealed that children were at risk of being drawn into toxic "rabbit holes" of depression and suiciderelated content on TikTok's 'For You' feed.

In an investigation using accounts to simulate 13-year-olds online, Amnesty International found that within 20 minutes of starting a new account and signalling an interest in mental health, more than half of the videos in TikTok's 'For You' feed related to mental health struggles. Multiple of these recommended videos in a single hour romanticized, normalized or encouraged suicide. This was one of Amnesty International's key findings in a <u>large-scale research project published in November 2023</u> on the risks to children and young people's rights posed by one of the most popular social media platforms of our time.

Ahead of the 2025 Mental Health Awareness Week, Amnesty International asked TikTok what changes the company had implemented since then. TikTok's response listed familiar 'well-being' measures, most of them already in place when the research was conducted and failed to acknowledge the app's "rabbit hole" problem. It also failed to produce evidence of any new targeted measures to address it.

TikTok's 2024 risk assessment under the European Union's Digital Services Act (DSA) acknowledges that "certain types of concentrated content, though not violative of TikTok's Community Guidelines, may cause harm by inadvertently reinforcing a negative personal experience for some viewers. For example, there may be an impact to mental well-being, particularly for Younger Users, associated with concentrated content relating to extreme dieting and body-image-related content."

In the same section of the risk assessment, TikTok lists mitigation measures such as the proactive enforcement of its Community Guidelines, maintaining content eligibility standards and applying "dispersion techniques" to the 'For You' feed as well as user tools, including filtering options and a refresh function to reset the feed. All these measures were already in place in 2023, when Amnesty International conducted its research and demonstrated that young users were exposed to systemic risks on the platform despite these measures.

LOTS OF PROMISES, BUT LITTLE ACTION

Despite TikTok's growing user base, particularly in countries with young populations like Kenya, where the median age is 20, the platform is yet to conduct a basic child rights due diligence to address any risks posed to its youngest users. TikTok's response to our latest research questions on what it is doing to makes the app safer for young users reveals that seven years after becoming available internationally, the company is still waiting for an external provider to complete a child rights impact assessment for the platform, a key responsibility under international human rights standards for businesses.

IT'S ON YOU TO SAY STOP - TIKTOK'S ADDICTIVE DESIGN

A young human rights activist in Kenya interviewed in March 2025 about his experiences on TikTok spoke about his struggle with excessive use of the platform, calling it "very addictive" and sharing that he tries to minimize his usage to four hours per day. The case is illustrative of Amnesty International's continuing concerns in relation to TikTok's addictive design and the limited use of easily dismissible time limits, which rely on user or parental action to curb excessive and unhealthy use of the platform. TikTok states that it works with experts in children's health to help design the app to respond to children's needs and that it has implemented new prompts to encourage teens to limit their usage. This nonetheless requires children and their parents to counteract the addictive potential of a platform that is designed to maximize engagement through design choices not dissimilar from those employed by casinos.

PRIVACY "CHOICES"

Amnesty International's research also highlighted that TikTok's privacy-intrusive business model tracks everything a user does on the platform to predict their interests, emotional state, and well-being. TikTok cloaks this invasion of users' right to privacy as a choice. In its response to Amnesty International's questions, TikTok states, "like other apps, TikTok collects information that users choose to provide, along with data that supports things like app functionality, security, and overall user experience" and that "viewing a video doesn't necessarily implicate someone's identity". And yet TikTok's 'For You' feed clearly picks up on a person's emotional state when it amplifies masses of depression and even suicide-related content and then uses their susceptibility to this content to recommend more of it, regardless of the potential harms. Young people's testimonies collected by Amnesty International highlight that many young people do not feel well-informed about what data is being collected by the app and do not feel "in control" of the recommended content or how their data is used.

Amnesty International shared its analysis of TikTok's continuing failure to address its risks to children and young people's rights with the company. Reacting to our allegation of TikTok's violation of the right to privacy, the company said, "Amnesty International's suggestion that TikTok is somehow aware of and utilizes a user's emotional state in order to recommend content is a mischaracterization of how our platform works." Echoing its DSA risk assessment report, TikTok's response to our findings also stated that the company is "using machine learning models to avoid recommending a series of similar videos on themes that do not violate TikTok's Community Guidelines but are potentially problematic if viewed repeatedly." In addition to the mitigation measures discussed above, TikTok said that it had "developed a screen time dashboard that provides visibility for a user into how and when they are on the platform."

TAKING ACTION

Some states are now implementing laws to force platforms like TikTok to assess and mitigate risks to users' rights and health. TikTok should not wait to be forced to make changes though, it must do so now.

You can help us call on TikTok to make the platform safer. Sign our #FixTikTok petition here.



ANNEX 1: TIKTOK'S WRITTEN RESPONSE OF 4 APRIL 2024





April 4, 2025

Amnesty International Peter Benenson House, 1 Easton Street London, WC1X 0DW United Kingdom

Dear

We received your letter inviting TikTok's response to questions about the safety, privacy, and rights of young people on our platform. We demonstrate in our reply the rigorous safety and privacy measures TikTok has implemented to both safeguard youth and support their self-expression, discovery, and learning on TikTok.

Our Approach to Privacy

Privacy and security are core to TikTok. We built the platform with integrated controls and choices that empower users to customize their app experience. We invest in protections at every level and provide people with choice and control so they can create, connect, and share with confidence.

It is simply false to assert that our platform collects "massive amounts" of personal data to create "profiles" on users. Like other apps, TikTok collects information that users choose to provide, along with data that supports things like app functionality, security, and overall user experience. Our <u>privacy policies</u>, available in-app and on our website, describe the types of information we collect and how it is used.

Moreover, the assertions about LGBTQ+ content made by the *The Wall Street Journal* and cited in the report are incorrect. As we said in 2023 when the article was published, TikTok does not identify individuals or infer sensitive information such as sexual orientation or race based on what people watch. As we told *The Wall Street Journal*, viewing a video doesn't necessarily implicate someone's identity. People engage with content for many reasons— a person may watch LGBTQ+ content without identifying as LGBTQ+, just as someone can enjoy baking videos without being a baker. TikTok is a place for discovery and entertainment.

We build privacy and security into every product at TikTok. From design to deployment, we embed strong privacy protections and give users transparency, choice, and control over their data. Protecting younger users is a core focus and we offer dedicated privacy and safety features, defaults and tools to create age-appropriate experiences.

In our previous letters, we provided an overview of the wide variety of default protections and safeguards that we have implemented globally to protect teen privacy and keep them safer on the platform. For example, for users under 16, accounts are set to private by default, direct messaging is not available, and their content cannot be downloaded or recommended in the For You Feed to people they do not know. In some circumstances, we also impose additional

requirements or restrictions in order to comply with local laws or to align with cultural expectations within certain markets.

Human Rights

As a global entertainment company, TikTok has a responsibility to ensure that our community is treated with fundamental dignity and respect on our platform. We are <u>committed</u> to respecting the human rights of all people, especially community members between the ages of 13-17.

As we explained in our 2023 response, TikTok consults with a range of stakeholders to inform our human rights due diligence. Since that time, we have continued to conduct periodic impact assessments in partnership with third parties. For example, we partnered with <u>Article One</u> to conduct a human rights impact assessment (HRIA) of our trust and safety operations, in line with the UN Guiding Principles on Business and Human Rights. We look forward to releasing a public summary of the HRIA sometime this year.

In addition to the Trust and Safety HRIA, TikTok has engaged Business for Social Responsibility (BSR) to conduct a Child Rights Impact Assessment. This assessment will review risks to children across the lifecycle of TikTok's global business and operations. The assessment is underway and is expected to be completed this year.

TikTok's Global Youth Council and Collaboration with Civil Society

TikTok regularly consults with a range of stakeholders to inform our human rights due diligence, including direct engagement with young people. In 2023, TikTok launched the industry's first Global Youth Council to engage young users directly and enhance their safety and well-being on the platform. The Youth Council plays a crucial role in shaping platform policies, providing insights into teen experiences, and addressing digital safety concerns. We are pleased to share that our Youth Council has been meeting regularly since our previous letter, and its input has led to significant changes, including restricting appearance-altering effects for users under 18, redesigning TikTok's Teen Safety Center, and launching the Digital Safety Partnerships for Families resource.

After a successful first year, the program expanded in late 2024, nearly doubling its members from 15 to 28 and extending its reach to 15 countries across all continents. TikTok also significantly increased the number of council meetings from 5 to 17, incorporating both regional and global discussions. This structure allows members to address local issues while contributing to broader, global conversations.

These meetings are organized and facilitated by Praesidio Safeguarding, a leading online safety agency specializing in youth participation. Partnering with Praesidio ensures that the council operates in a safe, supportive, and inclusive environment, empowering teens to share their perspectives openly. This collaboration helps translate their insights into meaningful platform improvements while prioritizing their safety and well-being.

In addition to consulting our Global Youth Council, we also regularly collaborate with external organizations that directly engage young people to help inform our policies and product. This

includes the Family Online Safety Institute (FOSI), National PTA, ConnectSafely and the Digital Wellness Lab at Boston Children's Hospital.

Teen Safety and Mental Health

We build the strongest safeguards into teen accounts by default to help ensure young people have positive experiences on our app—and to give parents peace of mind. We disagree with your report's characterization of our platform as inherently addictive; to the contrary, we have implemented strong safety and privacy features to support well-being and help teens and parents manage screen time. TikTok's STEM (science, technology, engineering, math) Feed is full of enriching, educational content and is turned on by default for all teens. Millions of teens use the STEM feed every week. Since our previous letter in 2023, we are pleased to share that we have expanded upon our teen safety features and launched important new tools to protect younger members of our community.

Our minor safety team holds a high bar of rigor for developing policy. Our policies are informed by peer-reviewed academic literature and ongoing consultation with external scholars. We work with leading youth-safety and well-being experts, as well as adolescent psychologists, to inform our approach. For example, TikTok partnered with the Boston Children's Hospital's Digital Wellness Lab, which serves a research innovation hub for studying the impact that digital technologies have on the well-being and mental health of children. We seek out feedback, research, and best practices from such experts and organizations, and we use this information to help design TikTok in a way that considers and supports the unique needs of teens. Based on input from these experts and published research in this space, we have adopted a nuanced, ageappropriate approach that distinguishes between early teens (age 13-15) and late teens (age 16-17).

For example, as you are aware, TikTok automatically sets a 60-minute screen time limit for every account belonging to a user below age 18. While there's no collectively-endorsed position on the 'right' amount of screen time or even the impact of screen time more broadly, we consulted current academic research and experts from the Digital Wellness Lab in choosing the limit. If the 60-minute limit is reached, teens will be prompted to enter a passcode in order to continue watching, requiring them to make an active decision to extend that time.

Research also shows that being more aware of how we spend our time can help us be more intentional about the decisions we make. So we also decided to prompt teens to set a daily screen time limit if they opt out of the 60-minute default and spend more than 100 minutes on TikTok in a day. This built on a prompt we rolled out the previous year to encourage teens to enable screen time management. In addition, we send every teen account a weekly inbox notification with a recap of their screen time.

TikTok has also introduced Family Pairing features that allow parents to customize the daily screen time limit for their teens and implement stricter standards if they feel it is needed. Once a parent-set limit has been reached, a teen can only use TikTok if their parent shares a unique passcode. TikTok does not disclose detailed statistics about its users or adoption of specific features as a privately held company. However, we are pleased to share that we have invested significant resources in promoting Family Pairing, including utilizing both earned and paid media such as advertisements, billboards, and local news. Family pairing has also been promoted

to users via in-app notifications and on our Guardian's Guide, available at: <u>https://www.tiktok.com/safety/en/guardians-guide/?</u>.

Since launching Family Pairing five years ago, we've continually added new features based on feedback from families, as well as guidance from leading experts. This March, we <u>announced</u> that we're enhancing Family Pairing by launching a way for parents to block their teens from being on TikTok during times that they control. We recognize that no teen or family is the same, so our Time Away feature allows caregivers to decide when it's best for their teens to take a break, whether it's during family time, school, at night, or a weekend away. Parents can also set a reoccurring schedule to best suit their family life. If plans change, teens can request extra time, but parents make the final decision.

We also recently announced a new way to encourage young people to switch off at night. If a teen under 16 is on TikTok after 10pm, their For You feed will be interrupted with our new wind down feature. At launch, this is a full-screen takeover with calming music to help teens relax and be mindful of the time. If a teen decides to spend additional time on TikTok after the first reminder, we show a second, harder to dismiss, full-screen prompt. As before, we deliberately do not send push notifications to teens at night, which cannot be changed.

We designed these features to reflect best practices in behavioral change theory by providing positive nudges that can help teens develop balanced long-term habits. In countries where this has already been piloted, the vast majority of teens decide to keep this reminder on. We are also testing adding meditation exercises to the wind down reminder, as research shows that mindful meditation can improve sleep quality.

We recognize that there is no finish line when it comes to protecting our community, which is why we continually strengthen our policies, processes, and features. Thank you again for the opportunity to respond to these reports. We welcome a continued dialogue on these important issues.

Sincerely,



ANNEX 2: TIKTOK'S WRITTEN RESPONSE OF 2 MAY 2025



J TikTok

May 2, 2025

Amnesty International Peter Benenson House, 1 Easton Street London, WC1X 0DW United Kingdom

Dear

Thank you for reaching out regarding Amnesty International's upcoming publication on youth mental health and human rights. We appreciate the opportunity to engage with you and welcome an open dialog on this topic. In addition to our previous responses, we are sharing further information about the steps we take to protect our community and uphold our commitment to respecting <u>human rights</u>.

For You Feed

As your prior letter discussed, TikTok utilizes a recommender system to offer content based on a user's interests and historical engagement. The For You feed (FYF) is a unique TikTok feature that uses personalized recommendations to allow users to discover a breadth of content, creators, and topics. The system takes into account factors including likes, shares, comments, searches, diversity of content, and popular videos. To mitigate risks from concentrated content, TikTok uses dispersion techniques in our FYF. This involves using machine learning models to avoid recommending a series of similar videos on themes that do not violate TikTok's Community Guidelines but are potentially problematic if viewed repeatedly.

User Empowerment

TikTok offers users tools to empower users to influence what they see on their FYF. This includes tools to understand why videos have been recommended, to filter out certain keywords or hashtags to stop seeing certain content, and to 'refresh' their FYF to view a new set of popular content as if they were a new user. Amnesty International's suggestion that TikTok is somehow aware of and utilizes a user's emotional state in order to recommend content is a mischaracterization of how our platform works.

In addition to the daily screen time feature discussed in our previous response, TikTok developed a screen time dashboard that provides visibility for a user into how and when

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they are on the platform. We built this tool so that users can make more intentional decisions about their usage and be more focused when they use it. In addition, TikTok partners with experts to develop toolkits for everyone to learn more about improving their well-being, and to build a supportive online community. These toolkits include our <u>Well-Being Guide</u>, our <u>Teen Safety Center</u>, and our <u>Guardian's Guide</u>.

We continually update and improve our platform policies and appreciate feedback from our users and third-party stakeholders. Last year, TikTok updated our Community Guidelines to address emerging and ongoing risks. This included an update to our Algenerated content (AIGC) guidelines and policies to remove any AIGC visual or audio representations of younger users if the platform becomes aware of such instances. In addition, we updated our Youth Safety and Well-Being policies around appropriate and inappropriate content, including detailed enforcement outcomes ('not allowed', 'restricted', 'FYF ineligible') and updated key terms related to Youth Safety such as CSAM, grooming, body exposure, and disordered eating.

Transparency and Accountability

As mentioned in our prior response, TikTok has engaged a third party to conduct a child rights impact assessment. We appreciate your feedback regarding key topics to evaluate in this assessment, which is underway and slated to be completed this year. We are eager to find new ways to demonstrate our commitment to transparency and are grateful to hear from stakeholders like Amnesty International. Both are driving factors behind our <u>Research Tools</u>, through which researchers in the U.S. and Europe can apply to study public data about TikTok content and accounts. This commitment is also behind our transparency reports, including our <u>Community Guidelines Enforcement</u> <u>Report</u>, which provides insight into how TikTok handles content on the platform. We publish this report quarterly in more than 25 languages and we provide more than 8,300 data points. We've substantially expanded the scope of our reports over time, adding more than 20 unique metrics since 2020, along with more than a dozen different dimensions through which the data can be analyzed, such as by policy and market.

Thank you again for the opportunity to engage with Amnesty International regarding youth well-being and human rights. Our work to make users feel safe and empowered on TikTok is ongoing, and we welcome a thoughtful dialog that supports that mission. Please don't hesitate to reach out again in the future.

Sincerely,

