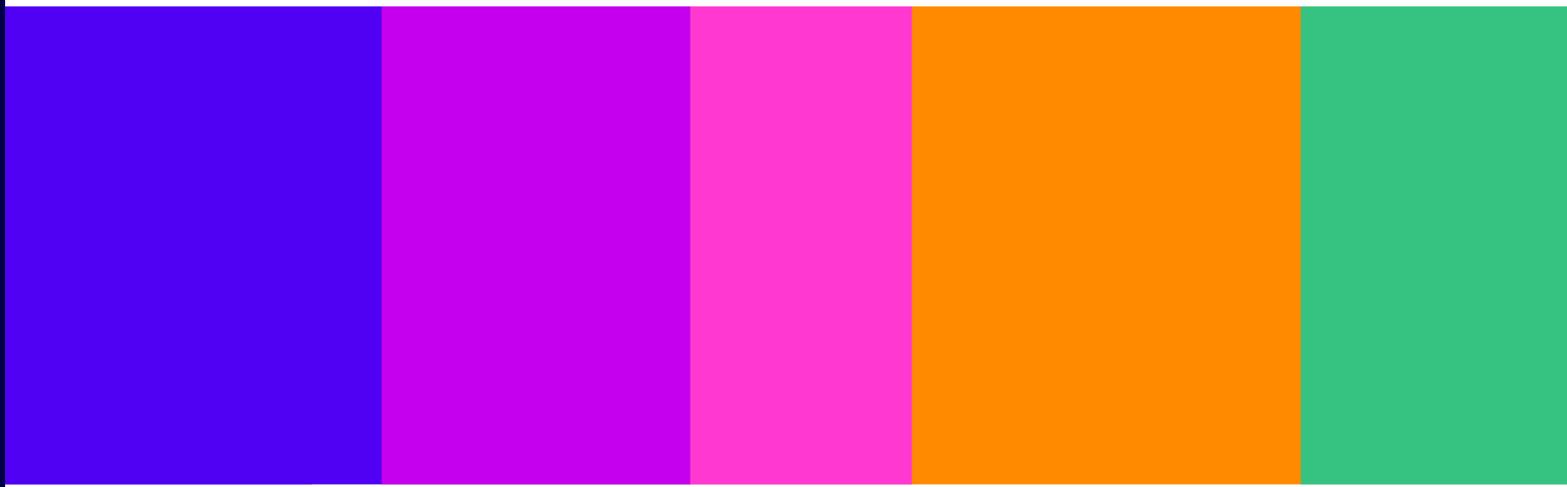


# How video-sharing platforms (VSPs) protect children from encountering harmful videos

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[Welsh overview available](#)

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# 1. Overview

Since November 2020, Ofcom has regulated online video services established in the UK, including on-demand programme services (ODPS) and video-sharing platforms (VSPs). We are now also the appointed online safety regulator under the Online Safety Act 2023.

In Ofcom's [2022 report on VSP regulation](#), we found that all notified platforms had safety measures in place, but there was more to be done. When it came to protecting children, we found that stronger measures were needed to protect children from accessing pornography and other age-inappropriate content. This year, we've taken a broader look at how VSP providers set, enforce, and test the measures they put in place to protect users. This included taking a closer look at how VSPs protect children online.

**This report shines a light on how TikTok, Twitch, and Snap<sup>1</sup> seek to protect children from encountering potentially harmful videos. We have focused on these platforms because they are particularly popular with children.**

Only platforms with the relevant connection to the UK are regulated under the UK VSP Regime. Many other VSPs – including YouTube and Instagram – do not fall under the UK regime because they are based elsewhere. So, our findings do not represent the entire VSP sector, nor do they indicate that TikTok, Twitch, and Snap are better or worse than the platforms not in scope of the UK VSP Regime. But our report does illustrate the approaches platforms have taken, and the challenges they've faced ahead of the broader online safety regime.

## Children's safety online is Ofcom's top priority

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**Children are now growing up as digital natives, with a strong understanding of using and living with technology.** Recent [Ofcom research](#) found that 96% of UK children view videos on VSPs like TikTok, Twitch, and Snap. But we know that platforms don't always design their services with the safety and needs of children in mind, and that children don't always have the knowledge or skills to safely navigate the digital world.

**Children are more susceptible to harm or influence than adults.** Children face many real risks in the digital world – they might see content depicting violence, sexual content, content promoting an unhealthy body image, or content encouraging suicide or self-harm. All these can have a lasting impact on their lives. Platforms must prioritise protecting children on their services and do all they can to mitigate these risks.

**The VSP Regime is already in force and VSPs must act now to protect children.** UK-regulated VSPs must protect children from videos that may impair their physical, mental, or moral development. Platforms need to use a range of measures, such as age assurance, access control measures and providing user-rating, reporting, and flagging mechanisms to protect their users – and especially their child users. We expect VSPs to act in accordance with the regime and protect children from harmful content online.

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<sup>1</sup> Only two parts of Snap are currently regulated under the VSP Regime: Spotlight, a personalised feed showing popular user-generated content; and Discover, a feed featuring curated content from verified media outlets and vetted content creators. The rest of the service is not regulated under the VSP Regime.

**There is no single fix-all measure that platforms can take to protect children online.** For example, an age limit on a service is likely to be ineffective if there is no mechanism to enforce this age limit, the mechanisms can be easily bypassed and if companies do not have policies in place to detect underage users using the service. [Ofcom research](#) shows that more than a fifth of children aged 8-17 have an adult online profile (i.e., with a user age of at least 18+) and a third of children aged 8-15 have one with a user age of 16+.

**The safety measures platforms take to protect children will vary depending on factors such as their service type, size, and user base.** Online services should understand the risks that their services pose to their user base. They should then put in place appropriate and proportionate safety measures to ensure, as far as possible, that children are prevented from accessing videos that are potentially harmful or not appropriate for their age. This also aligns with the regulatory framework that will be in place under the online safety regime.

**Children’s safety online will remain our priority as we start our new broader role as the UK’s online safety regulator.** Under the online safety regime, platforms will need to assess whether children are likely to access their services and – if so – comply with duties to protect children on their services. We already encourage VSPs to carry out risk assessments, but under the new regime platforms will be required to take steps to mitigate these risks. Ofcom will produce codes of practice setting out what all regulated services can do to mitigate the risk of harm and guidance on a recommended process for assessing risk. Our recently updated [roadmap](#) explains we are aiming to consult on the child safety phase of regulation in Spring 2024.

## What we’ve found this year

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We’ve gathered more information from VSPs to better understand how they protect children from encountering potentially harmful videos online. This report is not a comprehensive review of VSPs’ measures, but instead shines a light on how three big platforms – TikTok, Twitch, and Snap – are seeking to protect children from *accessing* potentially harmful videos. **We focused on TikTok, Twitch and Snap because they are especially popular with under-18 users.**

Here are our main findings:

- **All three VSPs enforce their minimum age restriction of 13 by relying on users declaring their correct age during account sign-up.** TikTok and Twitch leave it open for users to input their age. However, it’s easy for underage users to gain access by entering a false 13+ age. Snap’s model is similar but the interface defaults to an age of at least 13 – the nearest date available to select when inputting date of birth is 13 years prior to the current date. All three VSPs should explore improving how they identify children and stop them encountering harm.
- **TikTok, Twitch, and Snap enforce age restriction using a range of methods to identify potential underage accounts, although their effectiveness is yet to be established.** Methods include artificial intelligence (AI) technologies and human moderators. We’ll be exploring age assurance methods further as part of our ongoing work under the VSP regime. Based on the available numbers, it is difficult to infer the current prevalence of underage accounts.
- **A child needs an account to access most of Snap or TikTok’s content, but they don’t need an account to watch most videos on Twitch.** This means any Twitch user, regardless of age, can currently view all content on Twitch’s platform without signing up – including any video where a *mature* label has been applied (see below).

- **The three VSPs take different approaches to classifying and labelling content as not suitable for children – but children can sometimes still face harm.** TikTok classifies content based on certain mature themes, Snap ranks content on Discover and Spotlight to make sure it is age appropriate, and Twitch has introduced more detailed content labels for certain types of content. But without robust access controls and corresponding effective safety measures, children may still encounter harmful content. For example, all Twitch users – logged in or not - can view such content by simply dismissing the warning label.
- **TikTok and Snap both have parental controls designed to give parents and carers some oversight of their children’s online activity.** Twitch instead relies on parents supervising children in real time when they are on the service.

## Our next steps

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Ofcom will continue to talk to VSPs to learn more about their approaches and drive forward necessary improvements to better protect children. If we are not satisfied that a service is meeting its statutory duties, we will take enforcement action. Regulating VSPs and holding them to account also helps us [prepare to regulate](#) other online services under the Online Safety Act 2023.

# 2. Main findings

## Background

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- 2.1 VSP providers are required to take and implement such measures as are appropriate to protect users from videos containing ‘relevant harmful material’<sup>2</sup> and under-18s from videos containing ‘restricted material’<sup>3</sup>. It is for VSP providers to decide and take the measures that are appropriate and proportionate for protecting children on their service.<sup>4</sup> As a result, each platforms’ measures will differ according to their varying characteristics, such as types of content and user base. **Further information about the VSP Regime can be found in our [VSP Guidance](#) and the annex to this report.**
- 2.2 Under the VSP Regime Ofcom has powers to collect information and report on the measures taken by VSP providers for the purposes of protecting users from harmful material and the ways in which such measures are implemented. In October 2022, we published a report on [Ofcom’s first year of VSP regulation](#). One of our key findings was that more robust measures were needed to prevent children accessing pornography and other age-inappropriate content.
- 2.3 Our [other VSP publications](#) are available, including our [2023 report on what we’ve learnt about VSPs’ user policies](#) – which shone a light on platforms’ approaches to designing and implementing their terms and conditions and highlighted some examples of good practice.

## This report

- 2.4 Earlier this year, we requested information from TikTok, Twitch, and Snap on their safety measures, and undertook analysis to produce this report. We focused on these three services because they allow child users and are particularly popular with children. Our requests for information were issued between February and August 2023 with our analysis conducted until early September.
- 2.5 The report is not intended to provide a comprehensive overview of TikTok, Twitch, and Snap’s safety measures, but instead focuses on how they are seeking to protect children from *accessing* videos containing relevant harmful material or restricted material. Where we have outstanding questions or have identified areas of potential concern, we have and will continue to discuss this with VSP providers as part of our ongoing work to improve safety measures and better protect children online.

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<sup>2</sup> ‘Relevant harmful material’ under the VSP Regime refers to any material likely to incite violence or hatred against a group of persons or a member of a group of persons based on particular grounds. It also includes material which would be a criminal offence under laws relating to terrorism, child sexual abuse material, and racism and xenophobia.

<sup>3</sup> ‘Restricted material’ under the VSP Regime means video content which has or would be likely given an R18 certificate, video content not suitable for BBFC classification, or material that might impair the physical, mental, or moral development of under-18s.

<sup>4</sup> The VSP Regime lists measures that platforms must consider taking. Platforms may also choose to take other measures they consider appropriate.

- 2.6 This chapter presents some of our key findings, focusing on TikTok, Twitch, and Snap.<sup>5</sup> **We acknowledge that all three services vary in functionalities and size of user base. Therefore, direct comparisons are not appropriate and are likely to be unhelpful and potentially misleading.** As noted above, differences across VSPs may result from services' varying characteristics, such as different types of content or user base.

## How VSPs manage access to their platform

We sought to find out more about how VSPs understand their user base and take steps to enforce their minimum age requirements.

### TikTok, Twitch, and Snap all have a minimum age of 13 and rely on users declaring their true age when signing up

- 2.7 As we set out in our [VSP user policies report](#) published in August 2023, TikTok, Twitch, and Snap all have a minimum age requirement of 13 years old.
- 2.8 All three VSPs rely on users declaring their true age when signing up. On TikTok and Twitch, the date of birth selection is set neutrally, and users can freely select their date of birth. Snap's date of birth selection is blank, but the nearest earlier entry is a date of birth 13 years prior to the day the account is created. This is illustrated in the graphic below.

**Figure 2.1: Illustration of TikTok, Twitch and Snap's age gates**



- 2.9 We were also informed that Snap blocks between 100-175,000 UK users per month that are under 13 and do not qualify to join Snapchat.
- 2.10 Snap did not provide further information on how this is achieved or the accuracy and efficacy of this measure.
- 2.11 Not all VSPs rely on self-declaration. For example, OnlyFans is another VSP regulated under the UK regime. OnlyFans has an age limit of 18 and uses a multi-step registration process to confirm the age of its users. This includes using a facial age estimation process through a third-party provider called Yoti (and further ID verification if that fails) or an age verification process using a third-party provider called Ondato.

<sup>5</sup> Only two parts of Snap are currently regulated under the VSP Regime: Spotlight, a personalised feed showing popular user-generated content; and Discover, a feed featuring curated content from verified media outlets and vetted content creators.

- 2.12 OnlyFans hosts pornographic content<sup>6</sup> and so cannot be directly compared to TikTok, Twitch, and Snap all of which ban pornographic content and have restrictions on nudity. The multi-layered process deployed by OnlyFans shows that there are more accurate ways available for services to establish the age of their users during account registration. All VSPs should explore the options available that may be most appropriate to the platform, considering the nature of the material in question and the harm it may cause.
- 2.13 We expect platforms hosting pornographic content to take the strictest access control measures by implementing a more rigorous system of verifying the age of its users. We recently [launched a consultation](#) on our guidance to help online pornography services to meet their legal responsibilities under the online safety regime.

## Platforms should explore improving measures to identify children and stop them encountering harmful videos

- 2.14 [Recent research](#) published by Ofcom shows that more than a fifth of children aged 8-17 have an adult online profile (i.e., with a user age of at least 18+) and a third of children aged 8-15 have one with a user age of 16+. This calls into question how effectively self-declaration can operate on a standalone basis.
- 2.15 We therefore expect platforms to explore additional methods to gain a better understanding of the age of their users to be able to tailor their experiences in ways that are more appropriate to their age and that protect them from harm. Services should deploy methods to identify suspected underage accounts and take action to remove them from the platform. For example, proactive age assurance during account set up would allow for services to have a higher degree of certainty in the age of their users and would diminish the need for a focus on underage account detection after users have created accounts. This approach would help prevent underage users from accessing a service they are not allowed on.

## VSPs use a range of methods to identify underage accounts on their services but their effectiveness is yet to be established

- 2.16 We asked TikTok, Twitch and Snap about their methods for seeking to detect underage user accounts.<sup>7</sup> We found that these VSPs use a variety of methods to find underage accounts after they have been created. This includes a variety of behavioural and language analysis technology tools and case by case reviews by human moderators to specifically identify and remove underage child accounts on their services. We were informed that:

### TikTok

- 2.17 TikTok uses technologies to detect keywords that could help indicate potential underage accounts. No further information is provided for confidentiality reasons.

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<sup>6</sup> As OnlyFans hosts pornographic content, it is required to apply the strictest forms of access control measures to protect children from restricted material that has the highest chance of impairing their development.

<sup>7</sup> A child user is between the ages of 13-17. An underage account is an account used by someone under the age of 13 which is the minimum age required to use the VSP.

## Twitch

- 2.18 Twitch seeks to detect logged-in underage users with a combination of behavioural, language, and site analytics tools. This includes identifying underage accounts based on analysis of suspicious traffic data and an AI tool (Spirit AI) that can evaluate online chat in real-time. Twitch also detects child users generally through their human moderation team (i.e., safety specialists) who have been given guidance on how to spot 13–18-year-old users (with identifiers including certain facial features and body proportions).

## Snap

- 2.19 We understand that Snap relies on user reporting or flagging that a user is under the age of 13 as a means of instigating investigations to detect underage users.
- 2.20 Separately, Snap also noted that it uses inferred age model to understand which users are between 13 and 17. This uses a variety of signals including interest-based factors, users' use of Snapchat, and their friends' ages, to assess a user's age. These signals are used by Snap to prevent under-18s from seeing adverts of regulated goods on the Spotlight and Discover part of Stories.<sup>8</sup>

## We found wide variations in the number of underage accounts removed – and this will be an ongoing area of focus

- 2.21 As noted above, [research published by Ofcom](#) shows that more than a fifth of children aged 8-17 have an adult online profile (i.e., with a user age of at least 18+).
- 2.22 We asked TikTok, Twitch and Snap about how many underage accounts they identified and removed between 16 March 2022 and 16 March 2023. Varying datasets were provided in response. We compared the data provided against the VSPs' total UK user bases, based on either the total number of users or the total number of monthly active users (depending on what was available to us).
- 2.23 The information set out below is based on the information provided by the VSPs and is presented at a level of detail that takes into account the confidential nature of the raw data. Services provided somewhat different metrics. Twitch provided the number of underage accounts removed against their total UK user base, while TikTok and Snap provided the number of underage accounts removed against their monthly active users in the UK. As such, we acknowledge that it is not at this stage possible to make direct comparisons between the number of underage accounts different services remove.
- 2.24 The prevalence of underage accounts is a key source of concern given the relationship this has to the potential for harm to children. It is therefore vital that there is a wider understanding of how measures deployed in this area are working. The below information is useful in giving insight into service's measures but comparisons between these VSPs are not the purpose or intent in presenting this information. There may be a variety of factors that account for the number of underage accounts removed by a service. This may include the size of a VSP, the percentage of child users on a VSP, the types of metrics collected to measure levels of detection, the different detection methods of underage accounts that services choose to deploy including levels of accuracy achieved by these methods.

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<sup>8</sup> [Snapchat Ads Privacy & Transparency | Snapchat Privacy](#)

- 2.25 Nonetheless, we have included the below information on the number of underage accounts detected by services, as it gives insight into the output of the detection methods detailed above. As TikTok, Twitch, and Snap rely on self-declaration during account sign up, it is important to place focus on the measures used after account sign up to identify underage users who might have bypassed self-declaration by inputting the incorrect age.
- 2.26 We ultimately think it's important for VSPs to collect metrics and regularly assess and improve the efficacy of their measures to better protect children. The detection and removal of underage accounts is one measure available to protect children, but there are other ways to implement Schedule 15A measures to effectively protect children.

### TikTok

- 2.27 Due to data retention periods, TikTok was able to provide data covering a period of June 2022 to March 2023. The raw data has not been included for confidentiality reasons. TikTok provided the data compared against their UK monthly active user base and the included information is an approximation based on indicative data. This number represents all users, including adults and permitted children.
- 2.28 We were informed that the total number of underage accounts removed in the period was around 1.09% of TikTok's total UK monthly active user base.

### Twitch

- 2.29 On Twitch, we found that the total number of underage accounts removed in the period March 2022 to March 2023 (inclusive) was around 0.03% of Twitch's total UK user base. Again, the total user base includes adults and permitted children.

### Snap

- 2.30 Snap has told us that the total number of monthly active users during the period March 2022 to March 2023 was between 20 and 25 million. Again, this number includes all users, including adults and permitted children. Snap also informed us that, for the period March 2022 to March 2023, Snap removed between 700-1,000 suspected underage UK accounts.
- 2.31 Snap has stated this is indicative data given the limitations faced by Snap on the data they are able to collect and retain under US child privacy legislation.
- 2.32 The identification of child users and the prevention and removal of underage users on a service is a key part of the Online Safety Act. This will be an area of ongoing focus for Ofcom as we look at services' measures to identify and protect children.

## How VSPs manage children's access to video content

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- 2.33 Protecting children requires content labelling and age assurance measures to work effectively together to prevent children's access to potentially harmful content.
- 2.34 If content that could potentially be harmful to children is easily accessible, there is likely a higher risk of children facing harm. Access to such content needs to be restricted wherever possible. For access controls to be effective where such material is present:
- **content needs to be labelled appropriately** so that a video with mature or inappropriate content is rated as such; and

- **a service must know the age of its users** to be able to accurately restrict content to children – but allow it for adults.

2.35 This in turn relies on the accuracy of a service’s age assurance measures. If a service has age assurance measures which are easily bypassed, this will call into question the efficacy of any access control measures it may have in place. Equally, if content is inaccurately labelled, this will also have implications on a service’s access control measures. This highlights how one measure’s efficacy may be contingent on other existing safety measures – and both working together effectively.

2.36 Finally, if access controls are limited to logged-in users and services enable logged-out users to access all content, this will have consequences on the platform’s ability to prevent children from encountering harmful content. If a service enables users to access content without logging in or confirming their age, this publicly available content should be suitable for all audiences - to protect children from encountering harmful content.

## Anyone of any age can access content on Twitch, regardless of whether they have an account

2.37 We looked at how TikTok, Twitch, and Snap manage access to the video content on their services. This is what we found:

### TikTok

2.38 Users must have an account and sign in to view most content and to upload any videos to TikTok. Logged-out users can view a limited amount of content on the TikTok website, but a range of measures are applied to limit logged-out users from coming across potentially problematic content. For example, there are several rounds of human moderation, and any content that has a warning notice or videos with captions or hashtags that hit ‘sensitive word lists’ will not be eligible to appear to users not logged in.<sup>9</sup>

### Twitch

2.39 As an open access VSP, users do not require an account or need to be logged in to view content on Twitch. This means that most content – including content previously labelled as *mature* and now labelled through its new ‘Content Classification Labels’ – can be accessed and viewed by any user whether they are logged in or not. Twitch users do need to be logged in to upload content, follow or subscribe to channels, interact with other users in the chat or via direct messaging, and access a small part of content exclusive to subscribers.

2.40 We were informed that the number of logged-in users showed a wide variation in the period May 21- April 22, ranging from 7% to 44% (18% on average). In 2022, the number of logged-in users has remained well above or just below 30%, meaning that most users who access videos on Twitch are not logged in. This means that anyone with access to a web browser or mobile device can access most content on Twitch, regardless of their age.

### Snap

2.41 Only two parts of Snap are currently regulated under the VSP regime:

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<sup>9</sup> Ofcom, [Ofcom’s first year of video-sharing platform regulation](#), 20 October 2022.

- a) Spotlight, a personalised feed showing popular user-generated content; and
- b) Discover, a feed featuring curated content from verified media outlets and vetted content creators.

On the app, you need an account to see video content. The Discover and Spotlight functionalities have been viewable on Snap's website since September 2022 without an account. This means that anyone with access to a web browser can access content on Snap, regardless of their age. The majority of users access Snap via the app.

## VSPs take different approaches to classifying and labelling content – but children can sometimes still face harm

- 2.42 Content labelling can be used as a tool to tailor users' experiences based on their age. This can be done by services limiting access by children to content which is rated as *mature*. For example, a piece of content labelled as depicting graphic violence may be inappropriate for children to view and services may then add warning labels and/or restrict access to that content. This type of access control measure would also rely on services knowing the age of their users to ensure that children are prevented from encountering such content. We have found different approaches:

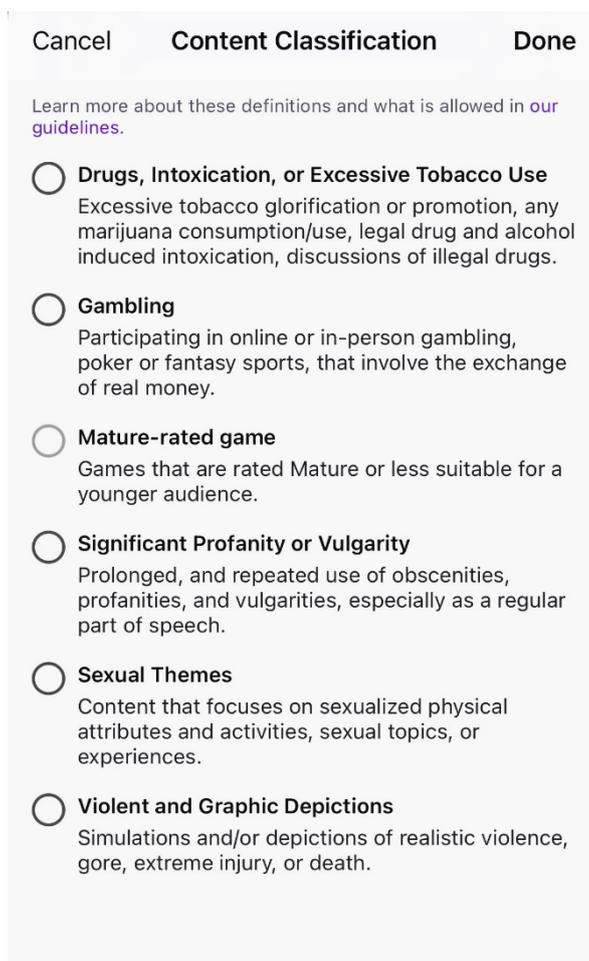
### TikTok

- 2.43 In July 2022, TikTok introduced its Content Levels, a content classification system that organises content on the platform based on thematic maturity. Content is classified into three categories: 13-15, 16-17, and 18+; and it encompasses content that is not prohibited on the platform but may be unsuitable for under-18s, e.g., overtly sexualised content, violent and graphic content, alcohol and tobacco, misleading content, and content uploaded by users who self-declare as under-16. Self-declared under-18 users will not be able to search or view such content, even if it is shared with them and, if they attempt to access it, they will be informed that the content is unavailable due to it being age-protected.

### Twitch

- 2.44 This year, Twitch made changes to its content labelling for its streamers. Previously, Twitch had the option for streamers to label their channels with a 'mature content' label. But in June 2023 it introduced more detailed content classification labels – including sexual themes, gambling, drugs and intoxication, mature-rated video games, profanity, and violence. These labels can now be applied to individual streams, prompting a warning to appear before users access the content. If streamers repeatedly fail to label content correctly, Twitch will apply a label to the stream that will be locked for a period of days or weeks, depending on the number of prior warnings issued to the streamer via email.

**Figure 2.2: Screenshot of Twitch’s content labels**



2.45 However, as noted above, Twitch remains an open-access VSP, and users do not need to be logged in to view content. To date, Twitch has not used its content labelling system to restrict access to content for logged-in users that have a declared age of 13-17. Regardless of whether a user (including a child user) is logged in or not, they can still access any content that is rated as mature (and dismiss the warning). We are engaging with Twitch about these measures.

## Snap

2.46 Snap uses algorithms to rank content on Discover and Spotlight. Content such as sexually explicit content, violence, or dangerous behaviour, is prohibited on Discover and Spotlight by Snap’s Community Guidelines and is reviewed by human moderators and automatic content moderation tools. To make sure the content on Discover and Spotlight is age appropriate, Snap considers the age self-declared by the user at the point of account creation and the potential age of the user based on the user’s friends and activity to classify users by age group. Age indicators will feed into the content ranking, which ultimately determines the content users are being exposed to on the Discover and Spotlight functionalities.

2.47 As a further comparator, **Vimeo** takes a different approach. As set out in our [2022 report](#), Vimeo does not allow users without an account to view videos that are rated mature or left unrated, reducing the likelihood that under-18s will encounter unsuitable videos. Four maturity labels are used: profanity, drug-use, violence and nudity. Only content that has been rated as suitable for all audiences can be accessed publicly without an account.

**Figure 2.3: Screenshot of Vimeo’s content labels**

**Content rating default**

Content ratings are required. They help keep Vimeo safe and ensure your intended audience can view your video. Your default rating will apply to all future uploads.

Mature ▾

- Profanity / sexually suggestive content
- Drug / alcohol use
- Violence
- Nudity

**Save**

- Also apply to all existing unrated videos

## How VSPs’ parental control systems operate

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- 2.48 Ofcom research has found that over seven in 10 parents of children aged 5-15 are concerned about their child seeing specific types of potentially damaging or inappropriate content online.<sup>10</sup> We recognise that some parents may want to use parental controls as part of their overall strategy to help keep their children safe online. Indeed, seven in ten parents of children aged 3-17 have said they use some form of technical control to manage their child’s access to content online.<sup>11</sup>
- 2.49 Parental controls are tools or systems that allow parents some oversight of and/or level of control over their child’s online activity. They can allow and empower parents to support their children’s digital lives. They can take various forms – for example, giving insight into, or a degree of control over, the type of content their child can see or the ability to restrict who can view the child’s uploaded content. We recognise that parental controls are often one part of a wider range of tools or strategies that parents may use to help keep their children safe – for example, family rules, screentime limits, and open dialogue.
- 2.50 For parental controls to be effective, they will generally require parents themselves to know and understand the platform – and be clear on how the parental control in question helps them support their children in practice. Platforms also need to grapple with balancing children’s legitimate interests to use their service against a range of different parental styles and rules. For example, some parents may think their child is mature and does not need many limitations on the videos they see, or they may want to be particularly involved in their supervision.
- 2.51 Implementation of parental controls cannot in isolation ensure child safety. Comprehensive child protection also relies on effective use of other safety measures including effectively and accurately knowing the age of users.

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<sup>10</sup> Ofcom, [Children's Media Literacy Tracker 2022 - Parents Data Tables](#), p. 140, p. 152, p. 155.

<sup>11</sup> Ofcom, [Online Nation 2023](#), 28 November 2023, p. 8.

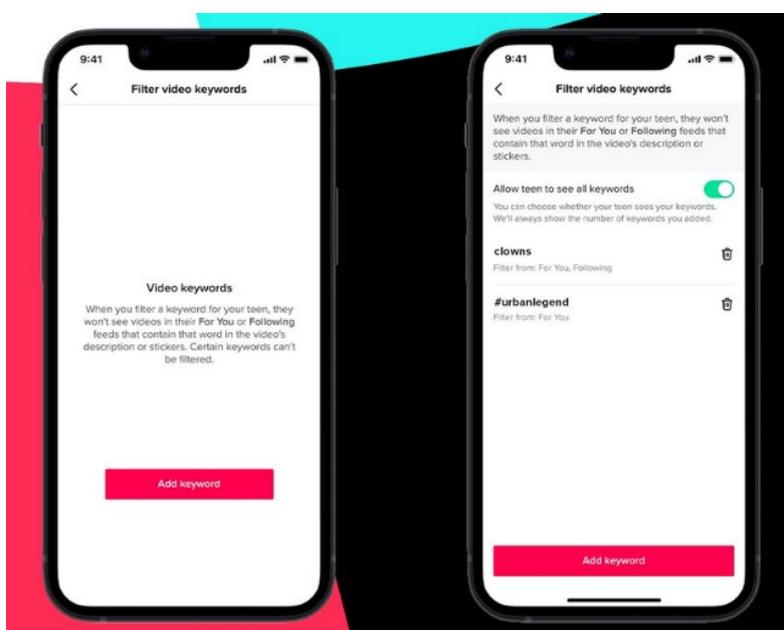
## Parental controls features are available on TikTok and Snap, but not on Twitch

2.52 We sought information about the parental control systems that VSPs have in place. This is what we found:

### TikTok

2.53 TikTok introduced Family Pairing in April 2020. TikTok uses its Family Pairing system to allow parents and caregivers to link their account with their child's account. Parents can select or deselect from several features including Screen Time Management, Restricted Mode, Search, Direct Messages, Privacy Settings, Dashboard, Mute Push Notifications, and Content Filtering.<sup>12</sup> Under-18 users can deactivate Family Pairing at any time, although the parent will receive a notification when they do.

Figure 2.4: Screenshot of TikTok's Family Pairing content filtering feature<sup>13</sup>



### Twitch

2.54 Unlike TikTok and Snap, Twitch has not implemented parental controls and instead relies on a requirement in its terms of service that under-18 viewers only use the platform when supervised by an adult. Users must agree to this policy when creating an account, although – as noted above – users don't need an account to access Twitch's videos. If Twitch is made aware that a user is violating this condition, Twitch will suspend the account. We discuss this further below.

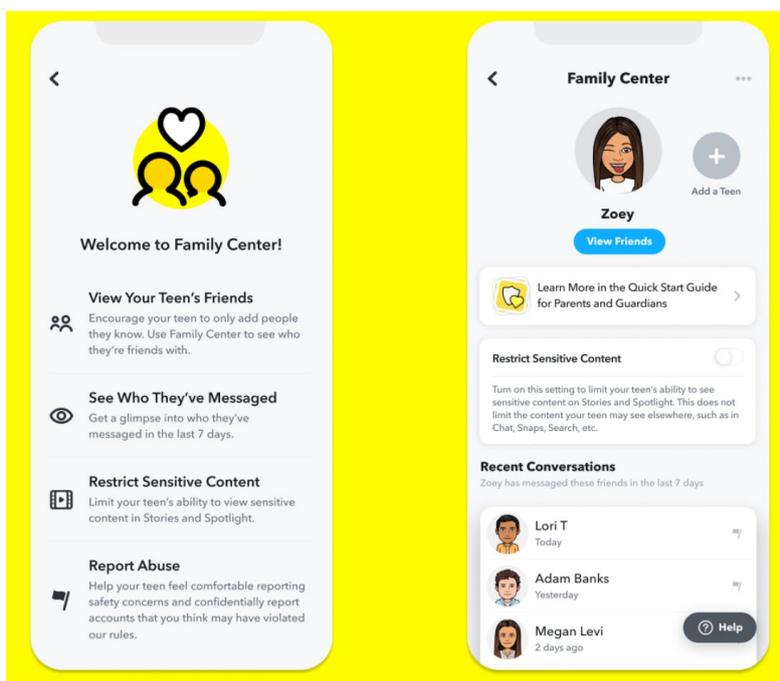
<sup>12</sup> Content filtering has been integrated with Family Pairing relatively recently. It allows parents to filter out videos with certain words or hashtags from the child account's feeds. Ofcom notes that by default, a teen can view the keywords their parent or guardian has added. However, parents can manage the visibility of these keywords. Teens can always see when a new keyword has been added and teens can always see how many keywords have been added.

<sup>13</sup> Source: TikTok, [Updating Family Pairing and establishing TikTok's Youth Council](#), 27 June 2023.

## Snap

- 2.55 Snap’s Family Centre launched in August 2022. Family Centre allows parents and trusted adults to link their account with a child account and report concerns.<sup>14</sup> To set up Family Centre, the child account must accept an invitation sent by parents or trusted adults and can leave Family Centre at any time. Family Centre gives the parent account the ability to see the child’s friends list, and who they have been communicating with in the past seven days (without revealing the details of the conversations).<sup>15</sup> In March 2023 Snap added Content Controls, which allow parents and trusted adults to limit the types of content their children can watch on Snapchat via the Discover section. In April 2023, following the release of My AI, Snap also released a feature which allows visibility into when children are communicating with My AI.

Figure 2.5: Screenshot of Snap’s Family Centre<sup>16</sup>:



- 2.56 **Neither TikTok nor Snap** currently verifies that paired accounts are being used by children’s parents, caregivers, or trusted adults.

## Uptake of TikTok and Snap’s parental controls

- 2.57 We asked about the use of TikTok and Snap’s parental controls. This is what we were told:

## Snap

- 2.58 Between 1 August 2022 (when Snap launched Family Centre) and 30 October 2023, under-18s’ use of Family Centre represented between 1-2% of Snap’s total under-18 daily

<sup>14</sup> For purposes of Family Centre, Snap regards a “Trusted Adult” as: “Any person over the age of 25, other than a parent or legal guardian, who can oversee a teen’s activities on Snapchat, including monitoring the teen’s friends list; who the teen is communicating with; and reporting concerns, all while always keeping the best interests of the teen top of mind.”

<sup>15</sup> In the coming months, parents will be able to see who is messaging their teen, not just who their teen is messaging and have access to their teen’s Snapchat settings.

<sup>16</sup> <https://help.snapchat.com/hc/en-gb/articles/7121384944788-What-is-Family-Centre->

active users as of 30 October 2023. We note that, while users may be more likely to engage with parental controls if they perceive them to be effective, uptake rates do not necessarily indicate the effectiveness of a parental controls system itself. The included information is an approximation given the limitations faced by Snap on the data they are able to hold. We also note that Snap's Family Centre is a nascent and growing product.

## TikTok

- 2.59 We also asked TikTok for this information, but TikTok could not provide Ofcom with accurate information in time for our publication. We continue to engage with TikTok on this matter. We will consider publishing an update to this report should we receive accurate information.

## TikTok and Snap's parental controls are designed to be flexible for parents

- 2.60 We asked TikTok and Snap about the planning and governance process for designing and implementing their parental controls. Both TikTok and Snap's parental controls include flexible features that can be adjusted by parents as children get older. This is what we were told:

## TikTok

- 2.61 TikTok's response stated that it designed Family Pairing with flexibility to adapt to children's evolving capacities as they age. TikTok stated that their vision for Family Pairing was to create an accessible, easy-to-use tool which allows a parent or guardian to help tailor their teen's experience on the platform. Parents can decide to use different features depending on their child's age and level of autonomy.

## Snap

- 2.62 Snap's response stated that the main design aim of the Family Centre was to empower parents and teens in a way that safeguards teenagers' autonomy and privacy. Snap's design process included a specific review relating to safety and privacy, consultation with a range of relevant experts from over 20 organisations, and engagement with families.
- 2.63 **Both TikTok and Snap** involved a comprehensive range of teams in the design and governance of their parental controls. For example, TikTok involved several specialist teams in the design and development of Family Pairing, including Minor Safety Product, Youth Safety and Wellbeing Policy, Trust and Safety Engineering, and Subject Matter Experts.

## Both TikTok and Snap take steps to raise awareness of their parental controls

- 2.64 Our VSP Parental Guidance research showed that parents would like to be made more aware of the safety information and tools provided by VSPs.<sup>17</sup> 47% of parents had never used parental controls on Snapchat, despite being aware of them. 41% of parents have never used parental controls on TikTok, despite being aware of them.<sup>18</sup>

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<sup>17</sup> Ofcom, [VSP Parental Guidance Research: Summary Report](#), 20 October 2022, pp. 10-14.

<sup>18</sup> Ofcom, [VSP Parental Guidance Research: Summary Report](#), 20 October 2022 p. 9.

- 2.65 We asked Snap and TikTok about the information they give parents and trusted adults about their parental systems, and how they raise awareness. Here's what they told us:

### TikTok

- 2.66 TikTok seeks to raise awareness of Family Pairing through a variety of media, including explanations in its Safety Centre and Help Centre. TikTok ran a marketing campaign starting in late 2022 to raise awareness of safety features including Family Pairing. TikTok used a pop-up to promote the Family Centre. TikTok has partnered with external organisations to produce resources, for example Internet Matters, to produce the TikTok playbook, a safeguarding guide for teachers to better support students' safe use of the service.<sup>19</sup> TikTok also provides resources for parents which includes advice about how to approach conversations about digital literacy and safety.

### Snap

- 2.67 Information about Snap's Family Centre is provided to parents through their dedicated Family Centre page on their Privacy and Safety Hub, their Support Site, and in-app, when parents or trusted adults set up Family Centre. Snap measures the awareness of parents and trusted adults of Family Centre through adoption of Family Centre, searches for Family Centre, visits to the Family Centre page on their Privacy and Safety Hub and the number of users who have used or attempted to reach Family Centre related help resources.

## Twitch requires parents to supervise their children in real life

- 2.68 In contrast to TikTok and Snap, Twitch has not implemented parental controls. Instead, its terms and conditions require under-18s to only use Twitch under the supervision of a parent or legal guardian who agrees to be bound by the terms of service. Twitch does not define what parental supervision means in practice, and leaves this up to users and their parents. Also, as noted above, users do not require an account to search and view content.
- 2.69 We asked Twitch about how it seeks to enforce this aspect of its terms of service. Twitch advised that, if it is made aware that a child is using the service without supervision, it will suspend the account pending receipt of parental permission.<sup>20</sup> Parents and guardians can also contact Twitch and request for their child's account to be deleted. Twitch requires reporting parents to provide specific account details to verify account ownership and complete and return a signed parental certification form to verify the parental relationship. Twitch has informed us that it has had no contact from parents requesting the removal of unsupervised child accounts over the 12 months from August 2022 to August 2023.
- 2.70 In terms of other resources, Twitch provides media literacy guides for parents about online safety for children. Twitch has also informed us that it believes targeted harm prevention and reduction are the most important forms of protection for under-18s, and that it is prioritising investing in safety tools and measures – such as new reporting technologies.

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<sup>19</sup> Internet Matters, [TikTok Playbook](#).

<sup>20</sup> Twitch will share a certification form which includes instructions on how to close the account within 48 hours.

# 3. Next steps

- 3.1 Ofcom wants children to enjoy the benefits of being online while being protected from harm. That’s why we are committed to helping keep them safe through the VSP and online safety regimes. Under the VSP Regime, we will continue to work with VSPs to ensure compliance with the regime and seek improvements where necessary. We will continue to:
- a) supervise and engage directly with platforms;
  - b) report on transparency; and
  - c) if appropriate, take strong enforcement action.
- 3.2 Our research, findings and experience will help us prepare to regulate online safety. The Online Safety Act 2023 received Royal Assent on 26 October 2023. This new regime expands the scope of services regulated by Ofcom. It also introduces new statutory duties for VSPs and a broader range of services. If you provide an in-scope service, you will need to determine whether or not children are likely to access it. If they are, you will need to assess the risks your service poses to children and take steps to mitigate them. In Spring 2024, we plan to consult on our draft codes of practice for the protection of children.
- 3.3 The VSP Regime is still in force and continues to apply in full. Annex 1 explains the future of the regime in more detail. Although the VSP Regime will eventually be repealed and replaced by the online safety regime, we remain committed to pushing for positive changes while it’s still in force. In early 2024, we will publish an update to our plan and approach for the VSP Regime. This will set out what we want to have achieved by the time the VSP Regime is subsumed into the online safety regime – and how we will ensure a smooth transition between the two regimes. In 2024, we’ll continue to examine different aspects of VSPs, and publishing our findings.

# A1. Regulatory framework

## The VSP Regime

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The VSP Regime is set out in Part 4B of the Communications Act 2003 (the Act) and derives from the European Audiovisual Media Services Directive 2018. In this report, we refer to the regulatory framework set out in Part 4B of the Act as ‘the VSP Regime’. The requirements for platforms came into effect in November 2020. At the same time, Ofcom was appointed as the regulator for VSPs established in the UK.

Ofcom has powers to take the necessary steps to ensure that VSP providers comply with their obligations under the VSP Regime. Our work to secure compliance with the VSP Regime includes ongoing policy development, supervisory engagement with VSP providers, publishing transparency reports, and taking enforcement action as appropriate.

As at the date of publication of this report, in-scope providers with the required connection to the UK are under a duty to provide advance notification to Ofcom under the VSP Regime. Providers must make their own assessment of whether their platform meets the legal criteria for notification as a UK-regulated VSP. As of November 2023, 21 platforms are notified to Ofcom.<sup>21</sup>

### What VSP providers must do

The VSP Regime sets out to protect users of VSP services including children under-18 from harms that may result from viewing specific categories of video-material. The VSP Regime does not centre on which individual pieces of content are allowed on a platform. Ofcom’s role is to ensure platforms have appropriate systems and processes in place to effectively protect their users from videos containing harmful material.

The legislation sets out a list of measures (known as Schedule 15A measures)<sup>22</sup> and VSP providers must take those that are appropriate to the platform in order to protect all users from ‘relevant harmful material’<sup>23</sup> and to protect children under-18 from ‘restricted material’. VSPs are required to implement their Schedule 15A measures effectively, and in a way that achieves the protection for which the measure is appropriate. They may also take other measures, not listed in the VSP Regime, which they judge appropriate to meet their duties.

The Schedule 15A measures include:

- having, and effectively implementing, terms and conditions for harmful material,
- having and effectively implementing, flagging, reporting, or rating mechanisms,
- applying appropriate access control measures to protect under-18s like age assurance and/or parental control measures,
- establishing easy-to-use complaints processes, and

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<sup>21</sup> Ofcom, [Notified video-sharing platforms](#)

<sup>22</sup> [Schedule 15A: Section 368Z1\(1\) of the Communications Act 2003](#)

<sup>23</sup> When VSP providers determine which of the measures listed in Schedule 15A are appropriate for their VSPs, they must do so having regard to the practicable and proportionate criteria listed under section 368Z1(4) of the Act. This includes taking into account their VSP’s size and nature, nature of material in question, harm the material may cause, characteristics of the people to protect, legitimate interests of the public and users, any other measures taken. 15 Schedule 15A to the Act I.

- providing media literacy tools and information.

Restricted material includes:

- video content which has or would be likely given an R18 certificate,<sup>24</sup> or
- video-content not suitable for BBFC classification,<sup>25</sup> or
- material that might impair the physical, mental, or moral development of under-18s.

For the purposes of this report, we have considered:

- implementation of minimum age requirements in VSPs' terms of service,
- access control measures such as age assurance,
- safety measures relating to the labelling of content, and
- parental control systems.

Our [VSP Guidance](#) provides more information on the VSP Regime. This includes how platforms should approach their regulatory duties.

## Repeal of the VSP Regime

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In May 2023 we published an overview of the [VSP Regime repeal process](#). The date of repeal of the VSP Regime will be decided by the UK Government. The VSP Regime continues to apply in full until such date as Schedule 17 of the Online Safety Act comes into force (this sets out the transitional provisions that will apply to services regulated under the VSP Regime at the time it is brought into force).

Once the transitional period comes into effect under the Online Safety Act, the VSP Regime will not apply to newly established VSPs (being those services that commence provision after the transitional period commences). Such providers will solely be regulated under the Online Safety Act.

UK-established VSPs that provided their services prior to the transitional period will be regulated under both the VSP Regime and the Online Safety Act although they will be exempt from most of the obligations under the Online Safety Act. Critically, all VSPs are now subject to the new communications offences, Ofcom's information powers and associated enforcement powers, and fee notification requirements under the Online Safety Act. VSPs will also become subject to the requirement to complete children's access and risk assessments once a date is specified by the Secretary of State via regulations.

We will be supporting VSPs in their preparations for online safety regulation throughout the transitional period. Our latest [roadmap](#) shows how we are planning for implementing the regime.

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<sup>24</sup> Certificate here refers to British Board of Film Classification (BBFC) 'classification certificate'. There is no requirement for material being provided on a VSP to be classified by the BBFC, but Ofcom is required to have regard to the [BBFC Classification Guidelines](#) when determining whether material on a VSP is R18-equivalent.

<sup>25</sup> The BBFC is responsible for 'classification certificate' which has the same meaning as in the Video Recordings Act 1984.