



June 20, 2025

***TikTok's response to the Global Symposium for Regulators 2025 (GSR-25)
Consultation on Best Practice Guidelines***

Thank you for the invitation to participate in the consultation on the GSR-25 Best Practice Guidelines. TikTok is committed to promoting and investing in safety and access and we appreciate the opportunity to share some of our practices, policies, and lessons learned.

TikTok is a global entertainment platform with a mission to inspire creativity and bring joy. We have over 1 billion users globally across every region and almost every market. Though we are fairly new to the ITU as a sector member of ITU-D, we believe our commitments to the protection of young people online, the promotion of digital development and of digital skills align with the work of the ITU development sector.

Across markets, we also engage thoughtfully and carefully to comply with local regulations, in line with our [human rights commitments](#). This includes adherence and commitments to the EU Digital Services Act and Digital Markets Act, the UK Online Safety Act and the Australian Online Safety Act.

Fostering innovation in regulatory approaches: How can regulators cultivate an innovation-driven culture in regulatory work and decision-making? What new skillsets and mindsets do they need today?

To cultivate an innovation-driven culture and approach to regulatory work and decision-making, we believe that regulators can benefit from working closely with industry, especially those companies particularly impacted by regulation, by leveraging their expertise. To successfully regulate digital sectors and understand where pain points exist for industry, open dialogue and learning has to take place. Opportunities like the Industry Connect sessions through the ITU Council Working Group on Child Online Protection are a good example of this type of open dialogue and exchange.

Regulators should also work to understand their consumers and the users of regulated services, to ensure that regulation is meeting the public good and consumer needs.

We believe in the need for proportional and targeted regulatory approaches, to ensure that regulations are designed to safeguard consumers and expand their access to the digital environment, rather than cause harm through unintended consequences. This includes ensuring that there is a level playing field across the market, to foster innovation and growth. Billions of people use TikTok and platforms like it not only for entertainment, but also for learning and economic opportunity and we should all be working together to ensure they have continued access to these platforms, while ensuring a safe experience.

Regulators should be engaging regularly in evidence-based and impartial research to inform their regulatory policies and work. They should also work directly with policymakers to ensure that new regulations are built in an evidence-based manner and are fit for purpose. At TikTok, we regularly underpin our policy decisions with research. For example, in Europe we worked with UK not-for-profit organisation [Internet Matters](#) to examine the role of online platforms in shaping teens' identity and relationships. This [research resulted in policy changes](#), restricting the use of some appearance effects for teens.

Adapting and enhancing regulatory capacity: How should regulatory mandates, capacity and decision-making evolve to balance market innovation with digital inclusion and support the achievement of broader social and economic policy goals? What institutional mechanisms can enhance regulatory responsiveness to emerging digital business models and evolving risks?

We would like to see regulators work towards international regulatory coherence and interoperability, especially where they are regulating the same set of platforms and in emerging sectors. This is especially important as we move to a more digital world, where so many regulatory regimes cover a limited set of companies. Coherence and interoperability will allow regulators to push for important practices and outcomes, while ensuring that companies have space to continue to innovate and remain agile with clear and consistent rules. GSR-25 and other regulatory convenings offer space and opportunity for regulators to work together to promote that coherence and alignment.

Regulatory coherence and interoperability is particularly important in the Global South, especially where legal frameworks might be catching up with technological advancements. To accelerate growth in the technology sector, these countries should adopt regulatory approaches that are flexible, innovation-friendly, and free from unnecessary uncertainty thereby creating an environment that attracts capital investment. At the same time, regulators should be building their own institutional capacity, through training and upskilling of staff, leveraging technology for smarter regulatory oversight, and strengthening legal and judicial foundations to ensure effective enforcement and long-term credibility.

As an example of good practice in regulatory coherence and interoperability, the Global Privacy Assembly of international data protection and privacy regulators undertook work to compare regulatory frameworks and standards in 2020/21. This led to the publication of comparative documents (which can be found [here](#) and [here](#)) identifying the degree of existing coherence between regulatory regimes internationally, and identifying areas where interoperability could be prioritized due to common principles being in place. A second example is from the Global Online Safety Regulators Network, that have done similar work, building a [comparative index](#) across online safety regulatory regimes and then [explaining how](#) they plan to work towards regulatory coherence.

We believe that regulators should conduct substantive public consultations ahead of regulatory policy making, and be required to take into account industry perspectives, as well as civil society perspectives. We have in the past worked closely with regulators through their consultations, including with regulators in Australia and the UK. This approach would be in line with the [OECD's best practice principles for regulatory policy](#) and the long-established [consultation](#)

[principles formulated by the UK government.](#)

Cross-border cooperation for building national, regional and global digital ecosystems: How can regulators leverage regional and international cooperation to foster harmonized regulatory approaches, knowledge exchange and capacity-building?

As mentioned above, we would like to see regulators working towards national, regional and international regulatory coherence and interoperability. We believe that there is space for regulators, their networks and global institutions to foster regulatory harmonisation and to engage with industry in their work to do so.

Examples:

- Over the last year TikTok has engaged in consultations and discussions with organisations like the ITU, OECD, Council of Europe and UNESCO on their work across a wide range of digital governance and regulation issues. These conversations have been incredibly fruitful, allowing for policymakers, regulators and industry to hear one another and share insights.
- In March we hosted the [2nd Annual Sub-Saharan Africa Safer Internet Summit](#) in Cape Town, where we had the chance to engage directly with policymakers and regulators across Sub-Saharan Africa on online safety issues.
- In October 2024, TikTok sponsored the Global Privacy Assembly conference, the annual gathering of international data protection regulators. TikTok participated in a panel discussion with regulators and academics to explore the broader spectrum of online harms, extending beyond data protection to include considerations around online safety and consumer protection.
- In 2023, TikTok [partnered with the Pakistan Telecommunications Authority](#) and local NGOs to train teenagers, parents and teachers about online safety across Pakistan through in-person workshops in schools. So far, the program has reached hundreds of thousands of people.

We also believe that regulators and governments should be supportive of free flows of data across borders, in line with commitments including the [OECD's data free flow with trust](#) initiative and [G20's 2024 Leaders Declaration](#).

International and regional business and cooperation can only happen if businesses can transfer required data across borders, safely and securely. Since the security and integrity of data is a key consideration to allow data to flow, we see a role for regulators of communications networks, cybersecurity and data protection to work in tandem to develop a more trusted environment.

Transparency

Beyond the questions you asked, which we directly responded to above, we think that it is incredibly important to consider the role of transparency in both the work of regulators and industry.

TikTok has made a commitment to transparency and we are constantly pushing ourselves to uphold that commitment in ways that are not only interesting and engaging, but accessible and understood by our stakeholders. Our



[Transparency Center](#) houses information about how we take steps to keep our community safe through our content moderation processes. This includes how we use automated technology to enforce our Community Guidelines, how our external partners flag potentially violative content, and the actions we take to support the well-being of our moderators. Regulators, including those in [Singapore](#) and [Australia](#), have also published transparency reports about TikTok, demonstrating our strong commitments to safety and transparency.

Thank you again for providing the opportunity to provide a submission to this consultation. We look forward to being involved in further conversations at GSR-25.