

## Annex 4 – Substantive content on TikTok aimed at children

This Annex sets out examples of content on TikTok that appears to be aimed at users younger than 13. In particular, such content during the Relevant Period included:

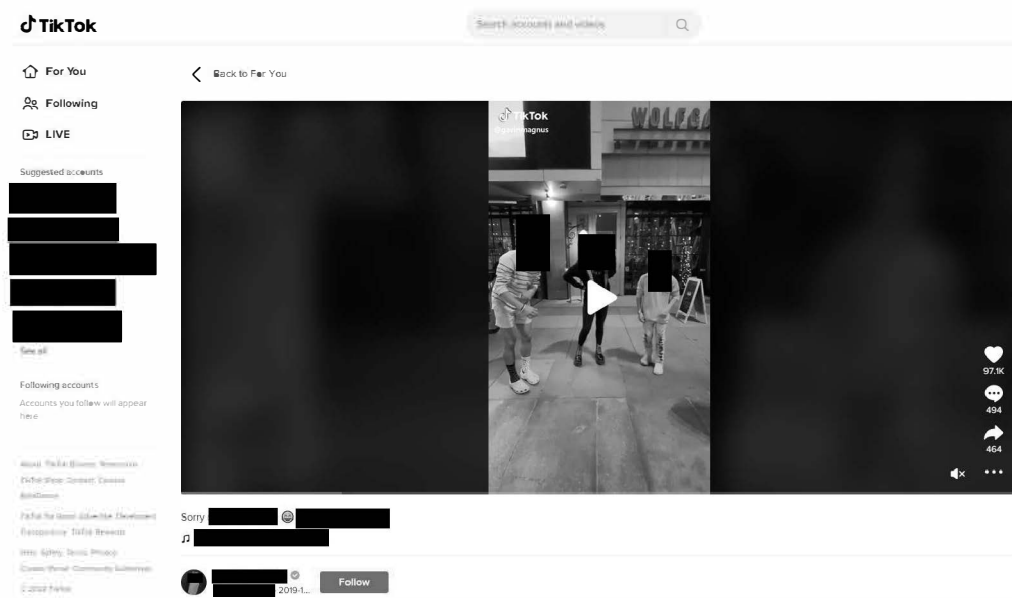
- High-profile children younger than 13, sometimes known as “*influencers*”, who had TikTok accounts and amassed large numbers of followers;
- Substantive content aimed at, and likely to appeal to, users younger than 13.

### (i) Examples of a high-profile child “*influencers*”

██████████ (who has the account ██████████ on TikTok) has 5.4 million followers as of July 2022. His date of birth is reportedly ██████████ 2007,<sup>1</sup> which means he did not turn 13 until ██████████ 2020. His account, however, features a number of videos from before that date.

For example, a video of him performing a backflip uploaded in 2019 (at which point he would have been under 13) has been liked over 97,000 times: see Screenshot 1<sup>2</sup> below. He is identifiable as a young child from the video uploaded: see Screenshot 2 below. Given his age, it is reasonable to expect that this content is likely to appeal to other under 13-year-olds.

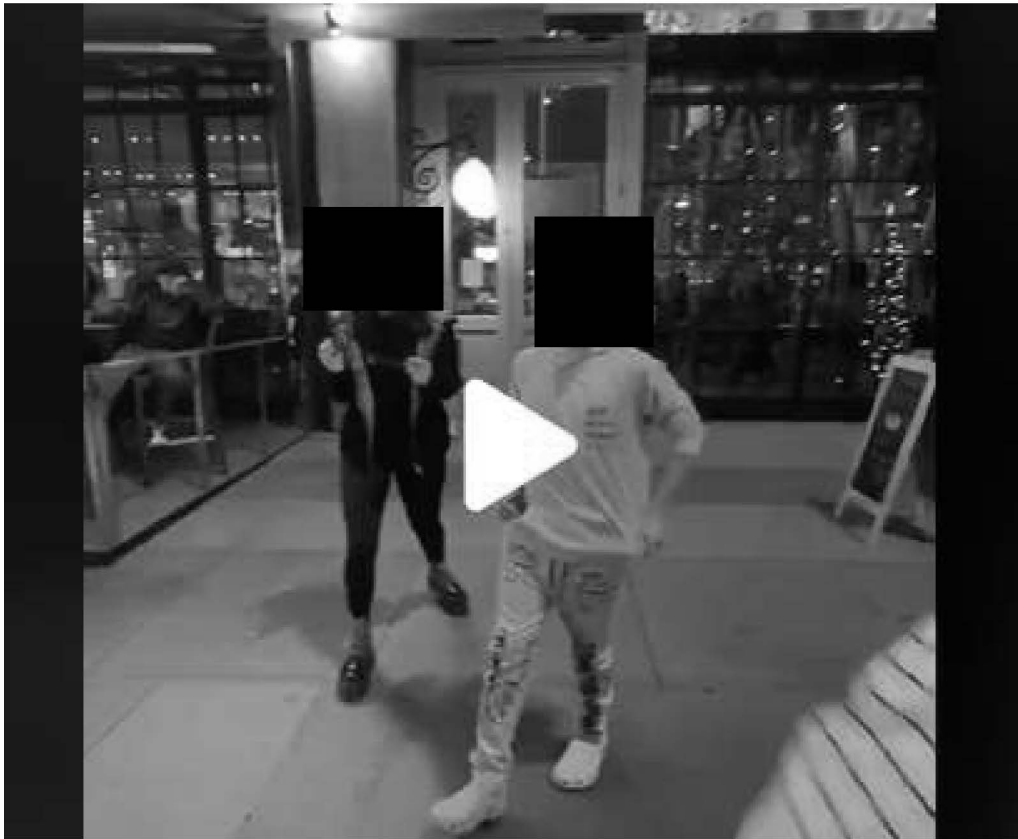
#### Screenshot 1:



<sup>1</sup> Who is ██████████? Wiki, Biography, Age, Net worth, Height, Girlfriend, Parents, Ethnicity & More (newsunzip.com)

<sup>2</sup> ██████████ (@██████████) Official TikTok | Watch ██████████ (@██████████) Newest TikTok Videos

Screenshot 2:



██████████ is a 9 year old child influencer (born ██████████ 2012). She became famous by performing a Disney song from the film Little Mermaid<sup>3</sup>. She is described as one of the "18 Top Kid Influencers" by the Influencer Marketing Hub<sup>4</sup>. On TikTok her videos feature on the account "██████████" where she sings and plays musical instruments: see Screenshot 3<sup>5</sup> from June 2020.

Screenshot 3:



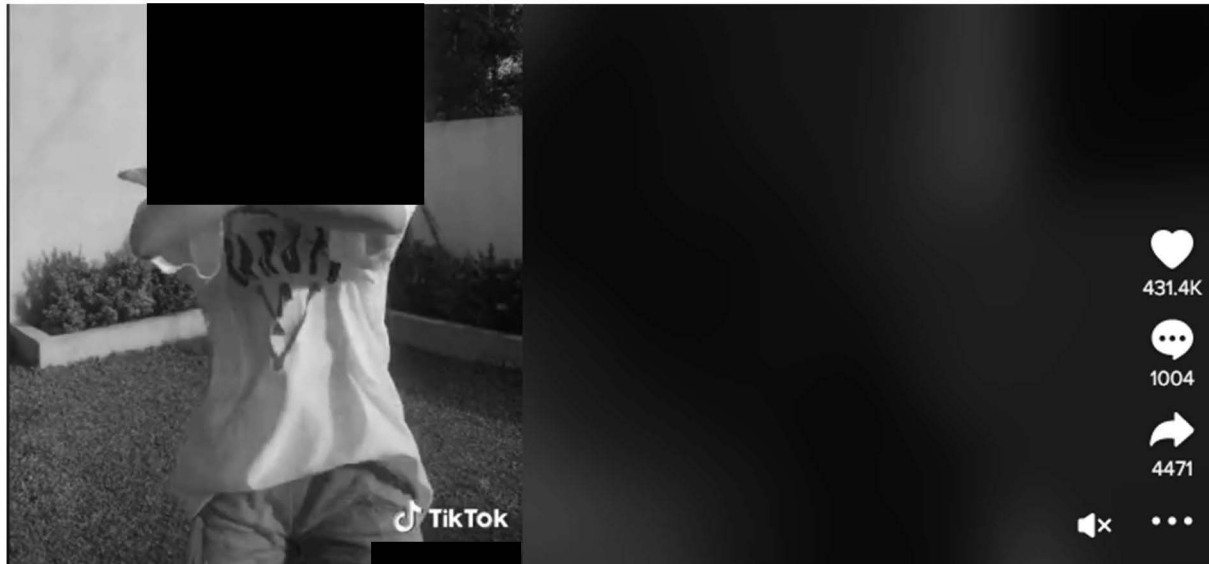
<sup>3</sup> ██████████ - Biography - IMDb

<sup>4</sup> 18 Top Kid Influencers Making a Name for Themselves (influencermarketinghub.com)

<sup>5</sup> ██████████ Official TikTok | Watch ██████████ Newest TikTok Videos

██████████ is another children's influencer born ██████████ 2006, known for her dance covers<sup>6</sup>. She has over 30 million followers and is said to be one of the top "kid influencers"<sup>7</sup>. See Screenshot 4<sup>8</sup> from December 2019 (when she was 13), which had over 400,000 likes.

Screenshot 4:



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<sup>6</sup> ██████████ - Wikipedia

<sup>7</sup> [18 Top Kid Influencers Making a Name for Themselves \(influencermarketinghub.com\)](https://influencermarketinghub.com)

<sup>8</sup> [yuhhh had to do it 🤩 choreo by the ██████████ \(tiktok.com\)](https://www.tiktok.com)

(ii) Examples of TikTok content aimed at, and likely to appeal to, young children

The following are examples of TikTok trends during the Relevant Period, which appear to be aimed at, and are particularly likely to appeal to, users younger than 13:

- **Present Unboxing.** This trend comprises videos which show a present or toy being unboxed. One such example is a video from 2020 showing a “banana crushies” toy being opened: see Screenshot 5<sup>9</sup>. From the video it can be seen the toy is likely to appeal to young children.<sup>10</sup> The video was posted by the account “ [REDACTED]”, which has over 170,000 followers.

Screenshot 5:



<sup>9</sup> [REDACTED] TikTok | Watch [REDACTED] Newest TikTok Videos

<sup>10</sup> The manufacturer recommended age from a publicly available amazon listing is 4-15 years olds ([Bananas BB35200 Wave 2 3-Pack : Amazon.co.uk: Toys & Games](#)).

- Another example of unboxing from January 2020 shows a “Baby Born Surprise” toy being opened: see Screenshot 6<sup>11</sup>. The video is posted by “██████████” with the hashtag “kidstoysunboxing”. Again, this video is likely to appeal to young children<sup>12</sup>.

Screenshot 6:



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<sup>11</sup> [BabyBorn Surprise!! Part 1 #unboxing #toyunboxing #fyp #foryoupage #kidstoysunboxing #requests \(tiktok.com\)](https://www.tiktok.com/@██████████/video/6844444444444444444)

<sup>12</sup> The manufacturer recommended age from the publicly available Amazon listing is “3 years and up” ([BABY born 904398 Surprise Series 3 Doll, Multi : Amazon.co.uk: Toys & Games](https://www.amazon.co.uk/dp/B084398))

- A further example of unboxing from June 2020 relates to “Bright Fairy Friends” advertised as “Coming to the UK in Sept 2020” by “Luppg Toys”: See Screenshot 7<sup>13</sup>. It is also likely to appeal to young children<sup>14</sup>.

Screenshot 7:

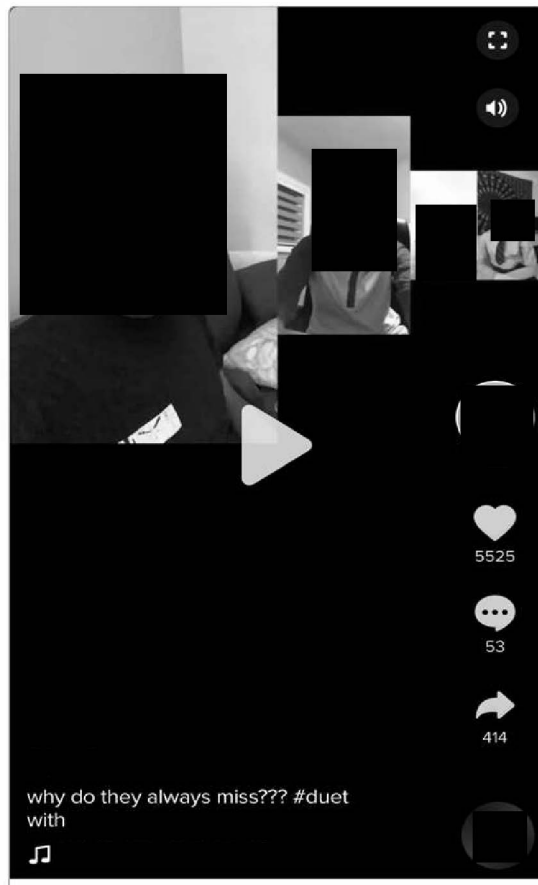


<sup>13</sup> [Bright Fairy Friends Coming to the UK in Sept 2020 #unboxing #toyunboxing #unboxingtoys #toy #doll #fairy #bffuk #brightfairyfriends #lightup #ad \(tiktok.com\)](#)

<sup>14</sup> The manufacturer recommended age from the publicly available Amazon listing is “3 years and up”(Bright Fairy Friends BFF Mermaid Doll : Amazon.co.uk: Toys & Games)

- **Hit or Miss.** The hit or miss trend involved shouting the phrase “*hit or miss*” in public places in anticipation of fellow TikTok users recognising the trend and following up with a line from the song “*Hit or Miss*”<sup>15</sup>. The example in Screenshot 8<sup>16</sup> evidences children who appear younger than 13 posting in relation to this trend.

Screenshot 8:



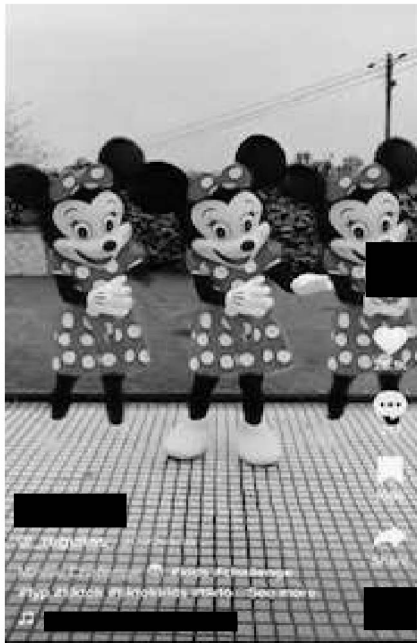
<sup>15</sup> “*Hit or Miss*” by [REDACTED], released 25 July 2016 (with subsequent re-recordings by other artists e.g. [REDACTED], released 3 January 2019)

<sup>16</sup> fellow\_kid ([REDACTED]) TikTok | Watch fellow\_kid's Newest TikTok Videos



- **Dance challenges for kids.** There are numerous dance challenges on TikTok which will appeal specifically to young children, such as the “*Minnie Challenge*”: see Screenshot 9<sup>17</sup>.

Screenshot 9:



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<sup>17</sup> [Minnie Challenge 🐭 #kids #challenge #fyp #tiktok #tiktokkids #tiktokchallenge #dance](#)