

Comparative Analysis of Global Policy Approaches to Online Age Restrictions

John Perrino

Senior Policy and Advocacy Expert, Internet Society¹

The global adoption of age-based restrictions for online content risks creating a fragmented and challenging landscape for Internet and Web architects. As jurisdictions from the United Kingdom to Australia enact diverse and sometimes conflicting regulations, the technical community faces a critical task: designing solutions to meet these policy demands without sacrificing core principles of privacy, accessibility, and an open, interoperable Internet.

This paper provides a comparative survey of complex global policy requirements to provide a foundational map for technical constraints, architectural trade-offs, and interoperability challenges that the IAB, W3C, and broader technical community must address to develop workable solutions.

Variations in Online Age Check Requirements

There is significant variation in permitted or required types of age checks in online age verification policies and regulations. This is why standardization is an important consideration. This variation creates significant interoperability challenges. For example, a technical solution optimized for “commercially reasonable” methods allowed in the U.S. may not meet the rigorous “double anonymity” standard required in France. There are also variations in the types of online services covered by the rules and the age ranges covered by regulations.

Age Restrictions and Bans

Many regulations cover or prioritize age restrictions for users under 18, especially for adult content, which often includes pornography, violent, or graphic content. Social media restrictions vary with age ratings and restrictions, typically applying to users under 18, 16, or 13.

¹ Affiliation for identification purposes only. The views expressed in this paper submission are those of the author in an individual capacity.

Covered Services

Pornography websites and social media, including messaging and online gaming platforms, are most commonly covered. Some age-based rules apply more broadly to online services, including the UK Online Safety Act and India's Digital Personal Data Protection Act. While some regulations distinguish the largest providers, such as the EU and Singapore, others take a neutral approach, like the UK. Australia's Online Safety Act sets online safety industry codes across six categories of online services: social media, app distribution, hosting, internet carriage, search engines, and equipment providers. Singapore similarly uses codes of practice.

Permitted Age Check Methods

Age-based laws often allow many different forms of online age checks. UK online safety regulator, Ofcom, has guidelines on permitted age verification measures, which include facial age estimation, credit card checks, or ID checks. In the US, many state laws allow "commercially reasonable" age checks, including most methods beyond self-declared age.

There is significant debate about whether age checks should be done by app stores or by online platforms. Singapore specifically targets app stores for enforcement, with similar proposals in US states and under consideration for national policy.

The European Union and Australia are currently assessing available age check methods. The EU is running digital identity wallet pilot tests, and Australia completed an age assurance technology trial, testing available technology with schoolchildren and adults.

Common categories of age check methods permitted by regulation include:

- Government ID or Digital Wallet
- Credit Check or Open Banking
- Mobile Network
- Facial, Voice, or Hand Gesture Age Estimation
- Database check (e.g., home mortgage or professional records)
- First Party Signals (data collected by online services about users)
- Other: Vouching, self-certification

Global Comparison of Online Age Verification Law and Policy

Country or Region	Requirements	Technical Guidance	Services	Stage
Australia	Restrictions for adult content (u18)	"Appropriate age assurance measures"	Search engines	Implementation (Dec. 2025)
Australia	Social media ban (u16)	Guidelines under development that cannot require government ID	Social media	Implementation (Dec. 2025)
European Union	Restrictions for adult content (u18)	Risk-based age assurance with a digital wallet under development	Online services	Implementation (TBD)
France	Restrictions for adult content (u18)	Rigorous checks, multiple options, and "double anonymity"	Online services	In Effect
India	Parental consent for data processing (u18)	Verifiable parental/guardian relationship mechanism	Online services	Implementation (TBD)
Indonesia	Content and service restrictions (3–5, 6–9, 10–12, 13–15, 16–17)	Risk-based age assurance with data privacy and security requirements.	Online services	Implementation (March 2027)
Singapore	App download age rating restrictions (u12, u18)	"Appropriate age assurance measures"	App stores	In Effect
United Kingdom	Restrictions for adult content (u18)	Guidelines include facial age estimation, credit card checks, or government ID	Online services	In Effect
United States	Some adult content and social media restrictions (u18)	Many states require a government ID or "commercially reasonable" age checks	Adult websites, social media	Varies by State
Vietnam	Mobile phone number or government ID verification	Direct integration with national identity systems or telco databases	Social media	In Effect

Select Global Online Age Check Regulations

Australia

Australia passed a law banning access to social media for children under 16 in 2024, with guidance under development. Online safety regulations also restrict access to adult content, with age verification required for users logged into search engines.

Online Safety Amendment (Social Media Minimum Age) Bill 2024

Status: Implementation Phase (Enforcement: December 10, 2025)

Ages: Under 16

Services: Social media

Requirements/Implementation: Guidance is being developed with an Age Assurance Technology Trial, testing available solutions. Social media platforms are required to enforce the age ban. Users cannot be required to provide a government ID.

Online Safety (Basic Online Safety Expectations) Determination 2022

Status: Implementation Phase (Enforcement: December 27, 2025)

Ages: Under 18

Services: Search engines (for logged-in users)

Requirements/Implementation: Search engines will be required to implement “appropriate age assurance measures” to guard against adult or inappropriate content, including pornography, self-harm, eating disorder content, or violence.

European Union

The Digital Services Act takes a risk-based approach to online safety. While not required, age assurance is encouraged for “very large online platforms” (VLOPs) with more than 45 million users in the bloc. Adult online services must block people under 18. The EU is developing an Age Verification Blueprint, including an EU Digital Identity Wallet.

Digital Services Act (DSA)

Status: Implementation Phase

Ages: Under 18

Services: Online services

Requirements/Implementation: The largest online platforms must take a risk-based approach to age assurance under DSA Article 28.

France

France passed a law requiring age verification for adult websites and nearly passed age verification requirements for social media in 2023. President Macron has renewed calls for a social media ban for children under 15.

Sécuriser et réguler l'espace numérique (SREN) [Security and Regulation of the Digital Space]

Status: In Effect (Court challenges)

Ages: Under 18

Services: Online services with adult content

Requirements/Implementation: Online services must implement age verification to restrict access to adult content. The French regulatory standard for age checks requires rigorous checks that guard against circumvention, provide users multiple options, and use a “double anonymity” method to protect services from knowing the user and age verification tools from knowing which service a user is accessing.

India

India has broad parental consent requirements for online services to process data for users under 18, with few guidelines and no set enforcement date.

Digital Personal Data Protection Act (DPDP Act)

Status: Implementation Phase

Ages: Under 18

Services: Online services

Requirements/Implementation: Online services are required to get parental consent to process data for users under 18. The rules apply when a child self-declares they are under 18, or someone claims to be a parent. Age and identity checks are required for parents to provide consent.

Indonesia

Indonesia is implementing an age-rating system that targets social media platforms with age check requirements for online products, services, and features. Age verification measures are expected to be proportionate to risk. Providers must use data minimization and security best practices.

Government Regulation Number 17 of 2025 concerning the Governance of Electronic System Implementation in Child Protection

Status: Implementation Phase (March 27, 2025 - March 27, 2027)

Ages: 3–5, 6–9, 10–12, 13–15, 16–17

Services: Electronic service operators

Requirements/Implementation: Risk-based approaches to age verification with data privacy and security requirements.

Singapore

The Singapore digital regulator requires major app stores to use age assurance methods to restrict app downloads based on age ratings.

Code of Practice for Online Safety for App Distribution Services

Status: In Effect (March 31, 2025)

Ages: Under-12 and Under-18

Services: App stores

Requirements/Implementation: App stores must implement “appropriate age assurance measures,” including facial age analysis, digital ID, and credit card checks. The regulator will consider industry best practices and digital standards.

United Kingdom

The UK Online Safety Act (OSA) requires restrictions to prevent children and young people under 18 from accessing adult content. UK online safety regulator Ofcom allows many age check options, including facial age estimation, digital ID wallets, email-based estimation, credit card checks, and mobile operator checks.

Online Safety Act

Status: In Effect (July 25, 2025)

Ages: Under-18

Services: Online services with adult material

Requirements/Implementation: Age checks are required for high-risk services, which include social media and adult websites, but also extend to Wikipedia and many other services. Guidelines include facial age estimation, credit card checks, or government ID.

United States

US states are regulating access to adult content and social media, including design codes restricting access to algorithmic recommendations and other features. At least 36 state laws are in effect, although some face legal challenges. National proposals include social media age restrictions or bans enforced by platforms or app stores.

Status: Varies across states, with at least 36 laws in different stages

Ages: US state laws typically apply to users under 18

Services: Adult websites and/or social media platforms

Requirements/Implementation: No national law requires age verification, but about half of U.S. states have such laws. A government ID or “commercially reasonable” age check methods, such as facial age estimation, are often permitted. Many state laws also permit credit or bank account checks or database matches.

Vietnam

Vietnam requires citizens to provide a mobile phone number or government ID to post or share social media content. Online gaming services must share a player's information upon government request. There is no set age requirement for online services.

Decree No. 147/2024/ND-CP

Status: In Effect (December 25, 2024)

Ages: N/A

Services: Social media

Requirements/Implementation: Social media services must authenticate users with a mobile phone number or government ID. Online gaming services must connect to the country's ID database to verify player information upon government request.