

Comparative International Approaches to Children’s Social Media Restrictions, Age Assurance, and Online Safety

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Published: May 2026

Purpose of this Comparative Overview

This comparative overview was prepared to contextualise the accompanying AMPH framework (Amplification Mechanisms of Platform Harms) within emerging international discussions relating to children’s online safety, age assurance, social media restrictions, and platform accountability.

The AMPH framework examines amplification-related mechanisms associated with recommendation systems and engagement-driven platform architectures, including patterns such as repetitive exposure, escalation dynamics, targeted intensification, artificial virality, network-driven amplification, and cross-modal reinforcement. Following review of the expert panel discussion questions, several international policy developments appeared potentially relevant to these broader themes.

The purpose of this overview is therefore not to evaluate or advocate for specific regulatory models, but rather to illustrate how different jurisdictions are increasingly engaging with issues that may intersect with amplification-related concerns, including harmful exposure pathways, engagement-driven platform features, recommender systems, youth vulnerability, age assurance, platform design, and broader systemic online risks.

Important Note

The table below includes a mixture of enacted legislation, implemented regulatory frameworks, draft proposals, government announcements, and policy discussions across jurisdictions. Inclusion does not imply full implementation or operational enforcement. The descriptions provided are intended as high-level summaries based on publicly available sources at the time of writing and should not be interpreted as legal advice or definitive statements of national policy.

References to potential links with the AMPH framework represent analytical observations intended to support discussion and contextual interpretation rather than empirical claims, causal assertions, or formal policy evaluations.

Table 1. Selected International Approaches to Age-Based Social Media Restrictions and Child Online Safety Measures

Country / Region	Status of Age-Restriction Approach	Indicative Age Threshold	Services / Platforms Discussed	Indicative Focus Areas	Potential Risks / Critiques Discussed	Illustrative Relevance to Amplification-Related Concerns
Australia	Enacted	Under 16	Selected social media platforms	Child safety, harmful exposure, and concerns relating to social media use	Privacy concerns, circumvention, migration to less regulated spaces	Potential relevance to engagement amplification, repetitive exposure patterns, and harmful-content amplification concerns
United Kingdom	Under discussion	No fixed social media age ban currently	User-to-user services and search services	Children’s risk assessments, age assurance, harmful content exposure	Compliance complexity, proportionality, age assurance privacy concerns	Potential relevance to harmful exposure pathways, recommender-system risks, and

						platform-level risk assessment discussions
European Union	Under discussion / varies across member states	Varies by member state	Large online platforms and online services	Systemic-risk mitigation, child protection, recommender transparency	Fragmentation across jurisdictions, age-verification concerns	Potential relevance to systemic amplification, recommender transparency, and online exposure concerns
France	Partially implemented / further restrictions under discussion	Under 15	Social media platforms	Youth wellbeing, cyberbullying, online safety	Rights-based and implementation concerns	Potential relevance to amplification, exposure-pattern, and engagement-related concerns
Norway	Proposed	Under 15/16	Social media services	Online exposure and child wellbeing	Verification burden and implementation feasibility	Potential relevance to online exposure, recommender influence, and youth-engagement concerns
Greece	Proposed	Under 15	Social media platforms	Addictive engagement and excessive use concerns	Enforcement feasibility and circumvention	Potential relevance to repetitive engagement and excessive-use concerns
Spain	Under discussion	Under 16 (reported in policy discussions)	Social media services	Youth wellbeing and online harms	Privacy and implementation considerations	Potential relevance to personalised exposure and engagement-related concerns
Malaysia	Planned / under discussion	Under 16	Social media accounts	Cyberbullying, scams, child online safety	Privacy and verification concerns	Potential relevance to online amplification and targeted exposure concerns
Singapore	No blanket restriction approach	No fixed social media age ban	Designated social media services	Harmful content moderation and user safety	Less emphasis on restrictive access models	Potential relevance to harmful-content amplification and exposure-management concerns
Brazil	Broader child online safety measures implemented	Varies across measures	Social media and digital platforms	Child safety and platform design concerns	Implementation and compliance challenges	Potential relevance to engagement-driven platform and exposure-related concerns
China	Implemented youth-access controls	Age-banded controls	Apps and internet services	Screen-time management and digital exposure	Concerns relating to autonomy and state oversight	Potential relevance to prolonged engagement, exposure management, and behavioural reinforcement concerns
United States	Mixed state-level proposals and measures	Varies by state/proposal	Social media and online platforms	Addictive-design discussions and child online safety	Free speech and constitutional concerns	Potential relevance to addictive engagement, recommender-system exposure, and platform-design concerns
India	Implemented child-data protection framework with emerging discussions around age-based social media restrictions	Under 18 for parental consent under DPDP framework	Social media platforms and digital services processing children's data	Verifiable parental consent, child-data protections, age assurance discussions, and child online safety	Privacy concerns, implementation complexity, age-verification feasibility, digital inclusion concerns	Potential relevance to personalised exposure, engagement-related, and child-data governance concerns

Concluding Observation

The examples above suggest growing international attention toward platform-level approaches to children's online safety, including recommender systems, engagement-driven design, age assurance, and systemic-risk governance. While policy approaches differ substantially across jurisdictions, many discussions

increasingly extend beyond content moderation alone toward broader questions relating to platform design, exposure pathways, engagement dynamics, and accountability. Broadly, the examples reviewed appear to reflect three emerging policy directions:

- (i) *access-restriction approaches*, such as those proposed or implemented in Australia, Norway, Greece, and Malaysia;
- (ii) *risk-based platform governance models*, such as those reflected in the UK, European Union, and Singapore frameworks; and
- (iii) *growing discussion around design-feature and engagement-based regulation*, including concerns relating to recommender systems, engagement-driven platform features, addictive engagement patterns, and algorithmically driven exposure.

Within this context, the AMPH framework may offer a complementary mechanism-based perspective by helping to explain how amplification processes within recommendation systems and engagement-driven architectures can contribute to harmful exposure trajectories. The framework may also help contextualise why access restrictions alone may not fully address underlying amplification dynamics where recommender systems, behavioural reinforcement, and exposure patterns remain central to platform operation.

Indicative sources: Ofcom, UK Government Online Safety materials, European Commission Digital Services Act guidance, OECD policy materials, Australian eSafety Commissioner publications, IMDA Singapore, and publicly available government and policy documents.