



# Social Media Minimum Age:

## Compliance update

March 2026

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## Executive summary

**The social media minimum age (SMMA) obligation requires providers of age-restricted social media platforms (platforms) to take reasonable steps to prevent Australian children under the age of 16 from having accounts.** The SMMA obligation is intended to give Australian children more time to develop their digital literacy skills and resilience to navigate the risk of harms associated with social media accounts.

In the first three months of implementation of the SMMA obligation, eSafety has focused its efforts on 10 platforms it considers are age-restricted social media platforms: Facebook, Instagram, Kick, Reddit, Snapchat, Threads, TikTok, Twitch, X (formerly Twitter) and YouTube.

eSafety has been proactively engaging with platforms and, according to information provided through legally enforceable notices, platforms have removed, deactivated or restricted access to a significant number of accounts. However, a substantial proportion of Australian children under the age of 16 continue to retain accounts, create new accounts, or pass platforms' age assurance systems.

In response, eSafety is focusing its compliance and enforcement effort on investigations into five platforms: Facebook, Instagram, Snapchat, TikTok and YouTube – and aims to make a decision about any enforcement action by the middle of 2026.

This report provides an update on what eSafety knows to date about implementation of the SMMA obligation since it took effect on 10 December 2025, informed by legally enforceable information-gathering notices and a range of other sources to support public transparency while maintaining the integrity of ongoing regulatory investigations.



## Key points

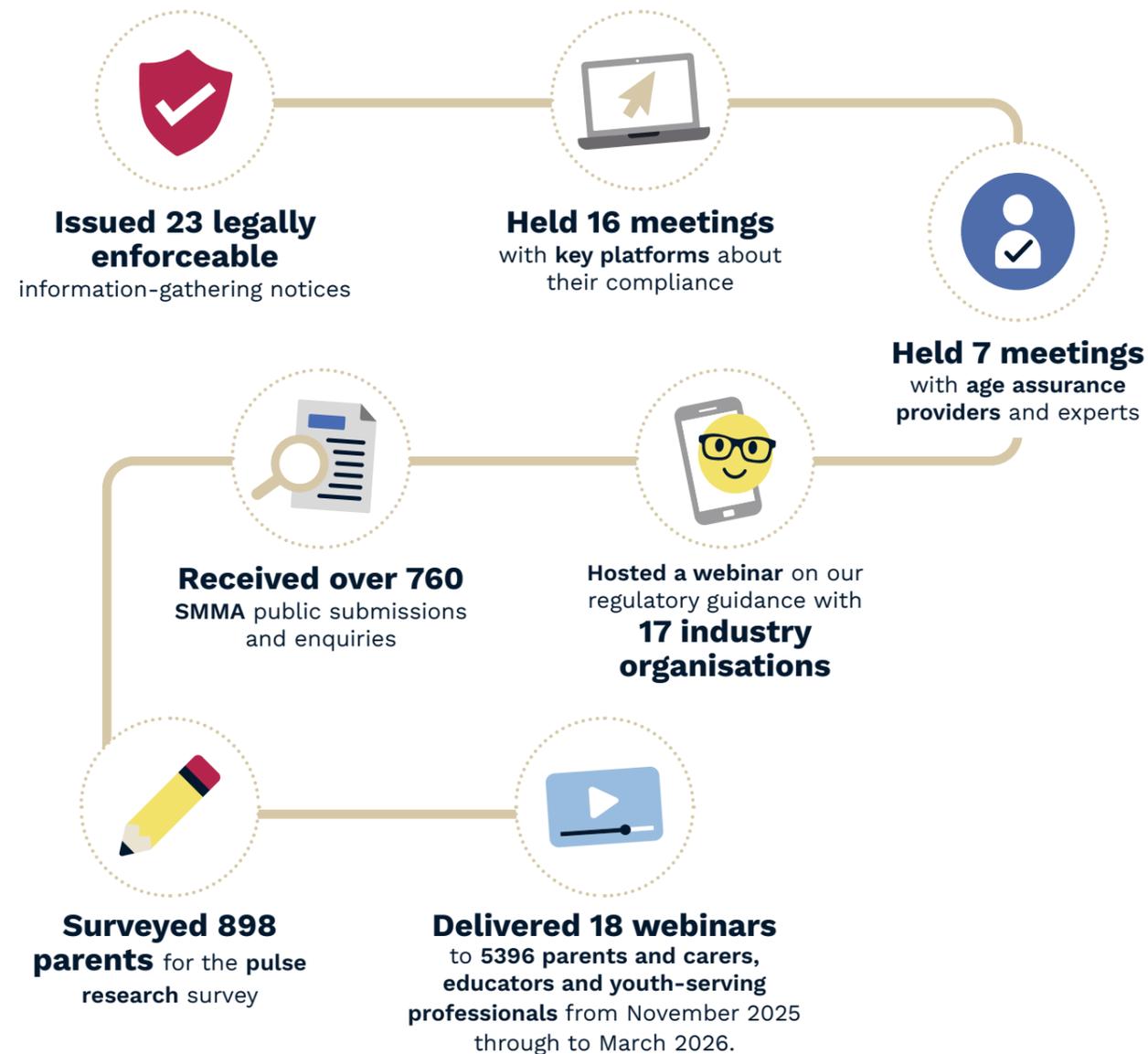
- **Steps have been taken to comply with the SMMA obligation:** Platforms have taken some steps to comply with the SMMA obligation, resulting in a significant number of social media accounts of children aged under 16 being removed, deactivated or restricted from signing into platforms since 10 December 2025. At the start of March 2026, over 310,000 additional age-restricted accounts were prevented from accessing platforms.
- **Positive steps and early feedback:** Some platforms have implemented (or improved) practical controls such as clear pre-commencement user communications (including links to support services for children who may be distressed at losing access) and more visible underage reporting pathways. Some educators through eSafety's National Online Safety Education Council reported early positive signals, including that some students appeared relieved they were no longer on social media.
- **Gaps remain – many children aged under 16 still have their accounts or can create new accounts:** Despite overall reductions in account ownership (also reflected in eSafety's parental pulse research survey), a substantial number of children aged under 16 retain accounts.
- **eSafety's assessment is evidence-based and draws on multiple sources:** eSafety is monitoring and assessing compliance through legally enforceable information-gathering notices, close and ongoing engagement with platforms, desktop research and testing, stakeholder outreach (including with third party age assurance providers), public submissions and enquiries, research and insights from complaints and other market intelligence. This triangulation supports transparency and strengthens the evidence base for regulatory decisions.
- **Compliance concerns have been identified:** eSafety has observed poor practices by some platforms in the first three months of the SMMA obligation coming into effect, giving rise to compliance concerns outlined further in this report. The poor practices identified in this document are illustrative of concerns, but further evidence is required to establish non-compliance with the SMMA obligation. We are continuing to investigate and collect necessary evidence to build a case for enforcement. In parallel, eSafety has proactively communicated specific concerns, and our expectations for improvement, to relevant platforms, which in some cases has already led to improved practice. eSafety continues to indicate, as outlined through its regulatory guidance, that it expects continuous improvement by platforms. We have stated that refining systems and processes takes time but, more than three months in, we expect to see further improvements quickly.

- **Enforcement is being prioritised where risk and impact are greatest:** Given the scale of the task, eSafety will prioritise enforcement action against the platforms that fail to take reasonable steps and demonstrate systemic failure in keeping children aged under 16 off their platform, focusing on those with the highest number of young users, and features and functions associated with harm.
- **What 'reasonable steps' means for compliance and enforcement:** Whether a platform has taken reasonable steps is contextually dependent and requires a review of both the regulatory landscape and business circumstances together. It is not a prescriptive test with a one-size-fits-all approach but instead requires a review of all steps taken in totality for an accurate and objective review of whether a platform has complied with the SMMA obligation. Enforcement action requires sufficient evidence that the platform has not taken reasonable steps to prevent children aged under 16 from having accounts, and (where court proceedings are pursued) what is 'reasonable' is ultimately a question for the courts to determine on the evidence in the context of the platform's service, technological feasibility and the regulatory landscape.
- **Five investigations are currently underway:** eSafety is actively investigating potential non-compliance in relation to Facebook, Instagram, Snapchat, TikTok and YouTube. We are aiming to finalise at least some of these investigations and make a decision about any enforcement action by the middle of 2026.
- On 25 March 2026, the Minister for Communications registered a new legislative rule to better target the law to ensure that it is protecting children from the harm driven by platforms that have addictive or otherwise harmful design features. The new legislative rule more closely ties the definition of age-restricted social media platform to the types of features that pose the greatest risk of harm to children. eSafety has assessed the identified age-restricted social media platforms against the new legislative rule and found that our assessment has not changed. In other words, in addition to satisfying the existing conditions for an age-restricted social media platform, these platforms also satisfy one or both of the conditions in the new legislative rule.

The purpose of this report is to provide as much public transparency as possible about the status of the world-leading SMMA, now three months after coming into effect. We will continue to be transparent and provide updates wherever possible. A primary consideration as we deepen our investigations is the protection of confidential information to maintain the integrity of our regulatory investigations.

# Our work to date

## Summary of key activities related to the SMMA



## Before 10 December 2025

In the lead up to 10 December 2025, eSafety was involved in the following key activities:

- Provided **advice** to the Minister for Communications before she made **rules** excluding certain types of platforms from the definition of age-restricted social media platform and recommending a harms-based lens focusing on harmful and deceptive features.
- Held **consultations** with more than 345 people representing over 160 organisations across industry, educators, parents, children and mental health organisations about our implementation approach.
- Published a **statement of commitment** to children’s rights. Provided regulatory guidance to industry about **how they can assess** whether they meet the definition of age-restricted social media platform, and what eSafety expects in terms of the **reasonable steps** age-restricted social media platforms should take to prevent children aged under 16 from having accounts.
  - Our reasonable steps guidance drew on our consultations, the **Australian Government-sponsored Age Assurance Technology Trial (the trial)** and eSafety’s previous work on age assurance. This included our **2023 Age Verification Roadmap and Background Report**, our **2024 Age Assurance Trends and Challenges Issues Paper**, and our **2025 Behind the Screen Transparency Report**, which provided a baseline understanding of the potential number of children aged under 16 with accounts.
  - This complements **guidance** from the Office of the Australian Information Commissioner (**OAIC**) on privacy aspects.
- Published a **list of platforms** we considered did and did not meet the definition of age-restricted social media platform at the end of 2025.
  - Given how many online platforms are operating in Australia at any particular time, and the way they are constantly evolving, it is not possible for eSafety to maintain an exhaustive list of all platforms that we consider meet the conditions for an age-restricted social media platform. Nor does the Act provide eSafety with specific declaratory powers. Instead, platforms operating in Australia have a responsibility to assess whether they meet the definition and are therefore required to comply with the SMMA obligation.
  - In addition to the platforms eSafety assessed as meeting the definition, several others notified eSafety of their view that they are age-restricted social media platforms. As set out on our **website**, these include BlueSky, Match Services, Yubo, Wizz, Lemon8 and BigoLive.

- Secured **commitments** from 10 platforms that they would take steps to comply (even in cases where they dispute that they meet the relevant definition or where they have challenged the law in court).
- Delivered 18 webinars to 5396 parents and carers, educators and youth-serving professionals from November 2025 through to March 2026.
- Set up an extensive social media age restriction **hub** with information for the public, including for young people, parents and carers, and educators.
- Established a **reporting function** for members of the public to provide information about whether and how age-restricted social media platforms are implementing and complying with the SMMA obligation.
- Conducted preliminary research with children, parents and carers, set up an **Academic Advisory Group** and commenced a methodologically rigorous **evaluation** of the implementation and outcomes of the SMMA, both intended and unintended.

## Since 10 December 2025

Since 10 December 2025, eSafety has been drawing on a range of information sources and insights to monitor platforms' compliance with the SMMA obligation. These include:

- desktop research and testing of platforms
- field research, such as our recent pulse survey of parents and carers
- trends from cyberbullying and image-based abuse complaints involving children aged under 16
- submissions to our SMMA web form
- public reporting, including from the media, researchers and academics
- market intelligence, such as app download numbers in Australia
- stakeholder outreach and engagement, including with educators
- several rounds of legally enforceable information-gathering notices to age-restricted social media platforms.

### 4.7 million age-restricted accounts removed or restricted from platforms as at mid-December 2025

The first legally enforceable information-gathering notices were given to identified age-restricted social media platforms on 11 December 2025.

On 16 January 2026, eSafety provided a **public compliance update** outlining that about 4.7 million age-restricted accounts were removed or restricted from platforms as at mid-December 2025. These numbers were provided to eSafety by the platforms themselves through legally enforceable information-gathering notices. Subsequently, some but not all providers have chosen to publicly release their platform numbers.

eSafety considered it in the public interest to publish the aggregated number of accounts that were removed from age-restricted platforms. This was to provide assurance to the community that platforms were, in fact, taking some action to find and remove under-16 accounts and that eSafety was actively monitoring those steps.

However, it does not intend to release the disaggregated number of accounts removed or other specific platform information that has been compulsorily obtained at this time. This information forms part of eSafety's ongoing investigations into potential non-compliance with the SMMA obligation, which precedes and informs the outcomes of any possible enforcement action, such as civil penalty proceedings. Confidentiality is therefore essential not just to protect the integrity of eSafety's investigations, but importantly the credibility and effectiveness of the scheme.

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Importantly, the 4.7 million figure reflects the number of age-restricted accounts removed or restricted, not the number of users who have lost access to one or more age-restricted social media platforms. As we know, individuals often have multiple accounts across multiple platforms. Some of those accounts might not have been actively being used, however had platforms only suspended or removed accounts they identified as being actively used as at 10 December 2025, this would not have satisfied the requirements of the legislation and would have enabled under-16 users with multiple accounts on their service to simply start using an account that had been inactive.

eSafety understands that each age-restricted social media platform is unique in the way that it is designed, how it is accessed and how accounts are configured. We recognise that these differences may be reflected in the way that each provider describes the action they have taken to comply with the SMMA obligation. For example, a provider may offer multiple platforms within its ecosystem that are all accessible by a single account – this would require the provider to restrict access to certain platforms that are age-restricted social media platforms (even if that user has never sought to access the age-restricted social media platform), in place of removing their account entirely.

Any figures related to the number of age-restricted accounts actioned prior to or on 10 December 2025 are not indicative of a platform’s compliance with the SMMA obligation. The figures should not be used to make inferences about a platform’s compliance but instead assist in informing a broader view of whether ‘reasonable steps’ have been taken.

### **At the start of March 2026, over 300,000 additional age-restricted accounts were prevented from accessing age-restricted social media platforms**

Based on information provided by platforms to eSafety in March 2026 in response to legally enforceable information-gathering notices, eSafety understands more than 300,000 additional accounts were prevented from signing in and accessing age-restricted social media platforms since the 4.7 million figure.

As platforms now rightly move not just to removing accounts that existed prior to 10 December 2025 but also focus on new account creation, this new figure includes both accounts that existed pre 10 December 2025, that may not have been identified initially by platforms for a range of reasons including that they had a declared age of over 16, but also new accounts created and attempted to be created by under age users since 10 December 2025.

While these numbers are helpful, they are not determinative of whether reasonable steps have been taken to comply with the SMMA obligation. It is the systems and processes that have been implemented by providers that are the most relevant to their compliance with the SMMA obligation. To improve public understanding of the systems and processes that platforms are implementing, this compliance update includes a summary of insights and some case studies to illuminate how age assurance is being deployed for the purpose of the SMMA obligation.

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## **Research and stakeholder insights**

eSafety is continuing to track commentary and pull insights from a broad range of sources. For example, we are aware of recent research from YouGov, Qustodio and others regarding Australians’ experiences of the SMMA.

eSafety has also commenced its own two-year longitudinal evaluation of the SMMA’s implementation and impacts, and in the meantime, conducted a pulse research survey of parents and carers to obtain some early data.

### **Pulse research survey of parents and carers**

Between 19 January and 2 February 2026, eSafety surveyed 898 parents and carers of children aged 8 to 15 years to derive key early insights into children’s experiences of the SMMA obligation from the perspective of their parents and carers. More detailed analysis, a description of the survey methodology and limitations, and platform specific insights are provided in the full report available on the eSafety website.

### **There was a reduction in the proportion of children having accounts on 10 platforms following the implementation of the SMMA obligation**

Almost half (49.7%) of surveyed parents reported their child had their own account on at least one platform prior to the restrictions coming into effect. This proportion decreased to 31.3% of children having a social media account following implementation of the SMMA obligation.

Patterns of reduced account ownership were observed across 10 platforms.

### **Despite overall reductions in account ownership, a substantial proportion of children under 16 retained accounts on age-restricted platforms**

Of the parents who reported their child had an account on each platform prior to 10 December 2025, around 7 in 10 reported that their child still had an account on Facebook (63.6%), Instagram (69.1%), Snapchat (69.4%), and TikTok (69.3%). Around 3 in 10 reported that their child no longer had an account. One in two of these parents (48.5%) reported that their child still had an account on YouTube following the age restrictions coming into effect.

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## Platform-led deactivation was the main reason children no longer had accounts on age-restricted social media platforms

When parents were asked why their child no longer had an account on any platform, the most common reason was platform-led deactivation (selected by 43.6% of parents whose child no longer had at least one social media accounts), followed by children deactivating their own accounts (36.3%), and parents or carers closing their child's account (26.6%).

## The most common reason children still had their social media accounts was that they had not yet been asked by the platform to verify their age

When parents were asked why their child had retained an account, the most common reason was that the platform had not yet asked the child to verify their age (selected by 66.8% of parents whose child still had any social media account).

## While consistent trends were observed across platforms, important differences in experiences of account deactivation and retention are evident and should be examined at the platform level

The most common reasons for account loss and retention were consistent across platforms; however, the proportions associated with each reason varied. The variations observed across platforms likely reflect the differences in their approaches to age assurance.

These insights highlight the importance of examining platform-level systems and processes in more detail.

## Submissions, complaints and engagement

eSafety's research suggests that some children under 16 have retained access to their accounts following the implementation of the restrictions. This is broadly consistent with information that eSafety has obtained through public submissions and complaints, and seen through other engagement.

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## Submissions to the SMMA form

Within the first three months since the SMMA obligation took effect, eSafety received more than 760 submissions to our SMMA form. Two overall themes emerged from these submissions:

- Concerns about children aged under 16 retaining or regaining accounts on platforms.
- Concerns over perceived inaction from platforms when they receive reports of age-restricted accounts. This was especially common among parents and carers who made submissions to eSafety, and aligns with some [recent media reports](#).

## Complaints made under eSafety's other regulatory schemes

eSafety works to remediate online harms experienced by Australians by investigating and taking action to address complaints involving [child cyberbullying](#), [adult cyber abuse](#), [image-based abuse](#) and [illegal and restricted content](#).

In our consultations about eSafety's implementation of the SMMA obligation, stakeholders expressed concern that children and young people could be disincentivised from seeking help if they feared that making a complaint could result in the removal of their account. As a result, [eSafety's messaging to children and young people](#) is clear that our focus in responding to complaints is helping the affected person who is experiencing online harm – we do not alert platforms that an individual complainant's account is held by a child aged under 16.

While we do not alert platforms to the presence of individual accounts for purposes of the SMMA obligation, we do draw on the data emerging from eSafety's complaint schemes to derive relevant insights. Three overall themes emerge from the complaints we received within the first three months since the SMMA obligation took effect:

- Children aged under 16 continue to report harm to eSafety – there has not been a discernible drop in overall numbers.
- We continue to receive complaints about online harm from children aged under 16 with accounts on age-restricted social media platforms. We have not observed a notable change in the number of cyberbullying and image-based abuse complaints involving age-restricted accounts across the platforms in January and February 2026 when compared to the same period in 2025.
- Parents and carers making reports on behalf of children express frustration that relevant platforms have not removed their children's accounts.

## Stakeholder engagement, including with educators

eSafety meets regularly with a wide range of stakeholders, including to seek feedback in relation to the SMMA obligation. While we have been pleased to hear from many different organisations across government, industry, not-for-profits and other sectors, one segment we were particularly keen to hear from was educators.

eSafety's National Online Safety Education Council (NOSEC) provides a forum for representatives from Australian school sectors to address online safety challenges and promote best practice approaches to online safety education. In March 2026, NOSEC participants highlighted three key observations:

- Initial wellbeing concerns about how the SMMA obligation could affect vulnerable children, especially over the 2025-2026 summer break, were not observed.
- Initial experiences of the SMMA obligation are mixed, with some children aged under 16 appearing to be relieved they are no longer on social media, and others seemingly celebrating their circumvention and retention of accounts.
- Anecdotally it seems children aged under 16 continue to have access to their accounts and platforms are not taking down accounts that are reported.

Collectively, the insights gleaned from these and other sources continue to inform the questions eSafety has posed to platforms, through meetings and correspondence, as well as information sought through our legally enforceable information-gathering notices. In some cases, platforms' responses to these notices have given us cause for ongoing investigation of specific systems and processes.

## Key compliance observations

The SMMA obligation requires age-restricted social media platforms to take reasonable steps to prevent Australian children under 16 from having accounts. An assessment of reasonable steps is contextually dependent, requiring a review of both the regulatory landscape and business circumstances together. It is not a prescriptive test with a one-size-fits-all approach, but instead requires a review of all the steps taken in totality for an accurate and objective review of whether a platform has complied with the SMMA obligation.

**Whether a platform has taken reasonable steps will include an assessment of the totality of the steps taken by a platform to comply with the SMMA obligation. Steps taken cannot be evaluated in isolation. This is about systems and processes, not individual accounts.**



eSafety's regulatory guidance sets out our expectations regarding reasonable steps, including that platforms should take a layered or 'waterfall' approach across the user journey to engage in effective age assurance. This can include implementing a range of measures to meet the SMMA obligation in a successive validation process, to derive a cumulative confidence in a user's age.

Over the first three months, we have observed some good practices, and in some cases, platforms have made improvements as a result of engagement with eSafety. However, we have also identified a range of poor practices giving rise to compliance concerns and opportunities for improvement, which we have shared with relevant platforms and have strongly encouraged them to address.

**The poor practices identified in this document are illustrative of concerns, but further evidence is required to establish non-compliance with the SMMA obligation.**



We make the following key observations:

1. Messaging to children aged under 16 on some platforms has encouraged them to attempt age assurance even where their declared age prior to 10 December 2025 was under 16.
2. In some cases, platforms have enabled children aged under 16 to repeatedly attempt the same age assurance method to ultimately obtain a 16+ outcome.
3. Pathways for reporting age-restricted accounts have generally not been accessible and effective, particularly for parents.
4. Some platforms appear not to have done enough to prevent children aged under 16 from having accounts. However, eSafety is continuing its investigations to enable it to form a concluded view as to whether any platform has not taken reasonable steps to comply with the SMMA obligation.

These observations, how they compare with what we set out in our regulatory guidance, and what they mean in practice for Australian children and their parents and carers, are explained in the following sections.

## Key observation 1: Messaging to children aged under 16 on some platforms has encouraged them to attempt age assurance even where their declared age prior to 10 December 2025 was under 16 years of age

While eSafety encouraged platforms to communicate to users ahead of the SMMA obligation taking effect so they would know what to expect, some of these communications have prompted children aged under 16 to update their age to 16 or older.

### Example

Jackie, a 14-year-old, signed up to a popular platform at age 13. In the lead up to 10 December 2025, Jackie was sent a message by the platform about the SMMA obligation coming into effect soon. The message included a link to undergo age assurance even though Jackie's declared age was 14. On 9 December 2025, Jackie used the link to undergo facial age estimation, which estimated Jackie's age as 16 years, allowing Jackie to keep an account with the platform.



## What our regulatory guidance says

Prior to any action being taken on a user's account under the SMMA obligation, platforms should provide the user with clear and supportive messaging, including about review mechanisms.

Platforms should prevent account holders who have previously self-declared as being aged under 16 from increasing their age to avoid account deactivation, and they should also avoid unreasonable practices that risk over-blocking access for those who are aged 16 or older.

Platforms are encouraged to consider the findings of the Government's age assurance technology trial, including their strengths and weaknesses.

## Good practices or improvements observed

- Many platforms communicated to affected users ahead of the SMMA obligation taking effect to explain what would happen, and some included helpful links to support services in case users may be feeling distressed, in line with eSafety's guidance.
- While we have received some public submissions about potential over-blocking of users who are aged 16 or older, it does not appear that this has been a widespread problem across any platforms.

## Poor practices observed

- At least one platform sent communications to users with age-restricted accounts where the user had already self-declared that they were under 16. This was to let them know that they could undergo age assurance to change their age to 16 years or older, if they had listed their age incorrectly. It was reported to eSafety to avoid over-blocking of those who had genuinely entered an incorrect age. However, it seems obvious this would lead to many children aged under 16 'having a go' and being under-blocked.
- The trial found that facial age estimation is a popular and effective form of age assurance – in particular, for confirming that a person is considerably younger or older than a given age threshold. However, facial age estimation is known to have higher error rates for children near the age threshold of 16 years. Platforms that encouraged self-declared 14- and 15-year-olds to undergo age checks and offered facial age estimation to increase their account age would have been aware that many of them would likely receive a false 16+ outcome.

## Current impact

It is likely that many Australian children aged under 16 have been able to retain their accounts by taking up platforms' invitation to change their self-declared age from under 16 to 16 years or older through lower confidence age checks.

## Key observation 2: In some cases, platforms have enabled children aged under- 16 to repeatedly attempt the same age assurance method to ultimately obtain a 16+ outcome

Some platforms have allowed users to have multiple tries with the same form of age assurance, even where there are signals that it might be providing a false result.

### Example

Jo is a 15-year-old with a social media account before 10 December 2025, but knows the platform their account is on is becoming an age-restricted platform.

When Jo tries to access the account on 10 December, it says that the new law is now in effect and users must be 16 years or older to hold an account. Even though Jo previously told the platform the correct age of 14, the message has an option to undergo age assurance to increase the age associated with the account. Jo decides to try facial age estimation and is happy to receive a result that says Jo is 16+.

A few weeks later, Jo's dad makes a report to the platform that Jo is a child aged under 16. The platform looks at the account and agrees there is reason to suspect Jo may be a child aged under 16. The platform messages Jo and requests another age check. Jo selects facial age estimation, knowing this worked last time. Jo is again assessed as 16+ and continues to hold the account.



### What our regulatory guidance says

Platforms should apply a layered or waterfall approach involving successive validation through a range of methods that create cumulative confidence that they have correctly determined a user's age.

Platforms should implement age assurance systems that are secure and reasonably resistant to circumvention.

In practice this means platforms should require users who have previously used one form of age assurance to undergo a second, more robust form of age assurance such as a bank- or ID-based check where they have reason to suspect the user is aged under 16 years.

### Good practices or improvements observed

- Some platforms have placed reasonable caps on the number of times a user can attempt any given age assurance method. This is in line with the recommendations of age assurance vendors as a direct result of post-implementation engagement with eSafety.

### Poor practices observed

- Some platforms have enabled a high number of re-attempts for users undergoing age assurance. While some allowance must be made for re-attempts in the event of a genuine technical mishap, some platforms are allowing a greater number of attempts than is generally recommended by the providers of age assurance technology – in some cases, allowing attempts in the double-digits when recommended good practice is no more than five.
- Some platforms are allowing users to repeat the same form of age assurance every time they are flagged as being potentially under the age of 16, even where it provides a relatively low-confidence 16+ outcome.

### Current impact

It is likely that many Australian children aged under 16 have been able to retain their accounts by securing a false 16+ outcome through multiple attempts at the same age assurance method.

## Key observation 3: Pathways for reporting children aged under 16 have generally not been accessible and effective, particularly for parents

Some platforms' mechanisms for reporting children aged under 16 are neither accessible nor effective.

### Example

Jessie is a 14-year-old who has held an account on a platform for two years. Jessie gave a false age of 14 when signing up at age 12, meaning the platform now thinks Jessie is 16 years old.

Jessie's mum becomes aware that Jessie still has an account after 10 December 2025 and asks Jessie if the platform has requested anything to confirm Jessie's age. Jessie confirms the platform has not requested anything to check Jessie's age.

Jessie's mum submits a report to the platform to inform them that her child is only 14 years old and request they close the account. She provided the platform with the username, Jessie's name and date of birth. Jessie's mum received a response asking her to provide a legal letter to support her claim as Jessie's parent. Jessie's mum looked into this but did not want to spend money on a lawyer to obtain the letter. The platform takes no further action. Jessie continues holding the account and receives no request for age assurance from the platform.



### What our regulatory guidance says

Platforms should provide accessible pathways for people to report potential children aged under 16 to trigger further age assurance processes and take reasonable steps to address vexatious reporting.

### Good practices or improvements observed

- Some platforms offer easy, intuitive and accessible mechanisms for people to report children aged under 16, whether or not the reporter has an account, and with minimal information required. Those platforms don't necessarily take the report at face value, but rather, use it as a signal that an age check should occur.
- Some platforms have implemented cross-system integration to ensure that reports of children aged under 16 identified through other reporting systems or tools are routed to the platform's dedicated team for review. Following engagement with eSafety, some platforms have increased the visibility of the reporting form and are communicating to users how to report children aged under 16.

### Poor practices observed

- It can be challenging to make a report on some platforms without having an account.
- It may take many clicks or a substantial amount of information to make a report on some platforms. For example, some platforms require proof that the reporter is the parent of the child aged under 16, such as a letter from a lawyer (even where they do not require the same level of proof when a person is purporting to be a parent vouching that their child is 16 or older).
- On some platforms, the messaging indicates reports can only be made about children suspected of being under 13 years old, rather than under 16 years old.
- In response to reports, some platforms have moderators review the account for evidence that the account holder may be aged under 16, and if they cannot find any evidence based on the account's activity, they will allow the account to remain active rather requiring the account holder undergo age assurance.

### Current impact

It is likely many reports of accounts held by children aged under 16 have not been lodged due to the barriers associated with making the report. Where reports have been made, many Australian children aged under 16 who have been reported to platforms have nevertheless been allowed to retain their accounts. This is because the reporter has not been confirmed to be their parent, or the platform decided there was not enough evidence on the face of the account that it belonged to a child aged under 16.

## Key observation 4: Some platforms appear not to have done enough to prevent children aged under 16 from having accounts

eSafety is concerned some platforms have not implemented effective systems to stop children aged under 16 from creating accounts. However, eSafety is continuing its investigations to enable it to form a concluded view as to whether any platform has not taken reasonable steps to comply with the SMMA obligation.

### Example



Jordan is 13 years old and is not sure about being able to get a social media account now that the Government has said the age has been raised to 16 years old to have an account. But Jordan decides to try anyway as some of Jordan's friends have managed to get accounts on one of the popular platforms.

Jordan downloads the app and enters an email address and date of birth, pretending to be 16 years old. Jordan is allowed to create an account and starts using the app. For weeks Jordan keeps waiting for a message asking for an age check to be completed, as surely the platform doesn't just believe Jordan is 16 years old.

The message never arrives and the platform makes no further checks, so Jordan continues to access the social media account.

### What our regulatory guidance says

Platforms can't rely exclusively on the self-declared age someone provides when signing up for an account – they must have additional measures for purposes of complying with the SMMA obligation.

In practice this could include:

- considering age signals from other sources, for example, by opting into the Apple App Store's Age Range API which provides the age range associated with the device
- applying other third-party age assurance measures, such as facial age estimation, bank-based checks or checks against email databases
- making sure they have robust age inference models that can flag within a reasonable period of time an account that is acting like it may be held by a child aged under 16, so the user can be age-checked.

### Good practices or improvements observed

Some platforms have:

- opted into Apple's Age Range API to receive the age range associated with the user's device alongside their self-declared age at account sign-up
- chosen to log out all Australian account holders and requiring them to undergo third-party age assurance measures when logging back in, where they were not confident they had effective age inference models
- invested in age inference models to flag accounts whose holders initially said they were 16 years old but are displaying signals that they are likely to be aged under 16, so they can be age checked
- applied (temporary) blocks where a person initially enters an under-16 age or date of birth when trying to set up an account so they can't immediately re-try with an older age or date of birth.

### Poor practices observed

- Some platforms have either elected not to opt into available age APIs, or are still considering it (in some cases, this is despite platforms having advocated for years for app stores to take a stronger role in checking age).
- While many platforms have incorporated third-party age assurance measures at various points (for example, when someone is trying to change their self-declared age to an older age), most platforms have not applied these measures at, or in close proximity to, the initial account sign-up stage.
- Some platforms have chosen not to apply any age inference models for purposes of SMMA compliance (even where they have existing models in place), some are still working on rolling out age inference technology (in some cases, relying on very limited signals), and others have applied models which appear to take months, rather than weeks, to produce a high-confidence flag that the account may be held by a child aged under 16.
- Some platforms have limited their blocks to very short periods of time (mere hours rather than days) such that a person who tried to create an account yesterday with an under-16 date of birth can re-try today with an over-16 date of birth and succeed.

### Current impact

It is likely many Australian children aged under 16 have been able to create accounts on age restricted social media platforms by simply declaring they are 16 or older, without being flagged as potentially being aged under 16 and put through any age check.

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## Ongoing investigations

Where eSafety considers a platform has not taken reasonable steps, we have a range of enforcement options available. These include:

- giving and publishing a platform provider notification<sup>1</sup>
- seeking a court enforceable undertaking<sup>2</sup> from the platform provider
- issuing an infringement notice
- seeking court-ordered injunctions or seeking court-ordered civil penalties of up to \$49.5 million.

Any enforcement action requires sufficient evidence, which takes time to gather.

The evidence must establish that the platform has not taken reasonable steps to prevent children aged under 16 from having an account on its platform. This is more than simply showing that a platform still has some children aged under 16 but rather that it has not implemented appropriate systems and processes.

eSafety has issued 23 information-gathering notices to 10 platforms to investigate and assess their compliance with the SMMA obligation. While there are fewer under-16s with social media accounts than there were four months ago, it is clear significant numbers of children aged under 16 are still on social media.

<sup>1</sup>A platform provider notification is a statement that can be given to a platform and, if appropriate, published on eSafety's website, explaining that the Commissioner is satisfied that the platform has contravened s 63D (failing to take reasonable steps to prevent age-restricted users having accounts), s 63DA(1) (collecting information) or s 63DB(1) (identification material and services).

<sup>2</sup>An enforceable undertaking is a legally binding, voluntary agreement between eSafety and a platform that the Commissioner is satisfied has breached a provision, whereby the platform undertakes additional actions to address the Commissioner's concerns, serving as an alternative to civil penalty proceedings.

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## Five investigations currently underway

eSafety is currently investigating potential non-compliance by five platforms – Snap, TikTok, Facebook, Instagram and YouTube. We are aiming to finalise at least some of these investigations and make a decision about any enforcement action by the middle of 2026.

These investigations will require giving further legally enforceable information-gathering notices to assess whether the steps taken by platforms are reasonable, identifying gaps, and assessing the totality of all steps taken by a platform. We are interrogating how the systems and processes have been set up and deployed and validating the information we have already obtained through previous legally enforceable information-gathering notices. eSafety will not hesitate to take enforcement action where it has sufficient evidence of non-compliance. This will include assessing whether the evidence provides reasonable grounds for commencing civil penalty proceedings.

While we commit to being as transparent as possible, we need to maintain the integrity of our investigations and ensure potential enforcement action is not compromised.

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## New legislative rule made

On 25 March 2026, the Minister for Communications registered a [new legislative rule](#) to better target the law to ensure it is protecting children from the harm driven by platforms that have addictive or otherwise harmful design features. The new legislative rule more closely tied the definition of age-restricted social media platform to the types of features that pose the greatest risk of harm to children.

In addition to the existing conditions set out in the Online Safety Act, the new legislative rule provides that platforms must also have either or both of the following conditions to be an age-restricted social media platform:

- A recommender feature, that selects and displays material to end-users on the age-restricted social media platform based on that end-user's information
- A logged-in feature, defined as endless-feed, feedback, or time-limited features.

eSafety has assessed the identified age-restricted social media platforms against the new legislative rule and has found that its assessment has not changed. In other words, in addition to satisfying the existing conditions for an age-restricted social media platform, these services also satisfy one or both of the conditions set out in the new legislative rule.

The self-assessment tool for industry to assess if they are an age-restricted social media platform has been updated to account for the new rule [on our website](#).

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## Next steps and future milestones

### Continuing engagement with industry

Industry engagement forms part of eSafety's compliance and enforcement capability, working with platforms to drive continuous improvement and achieve compliance with the SMMA obligation. eSafety has been meeting regularly with platforms over the last year to ensure awareness of the industry's obligations, share information on compliance uplift, escalate eSafety's concerns and resolve compliance gaps where possible. We are pleased to see platforms have made improvements based on eSafety's concerns and feedback.

eSafety is monitoring migratory patterns of social media use by children under the age of 16 and will adjust its regulatory focus as needed to ensure platforms operating in Australia are complying with their obligations. As expected, there have been some short-term increases in downloads of some emerging apps, but we have not seen any significant migration to non-compliant platforms or other online services that are not required to comply with the SMMA obligation. We believe this is largely because the profusion of online services young people may be migrating to do not have a critical mass of their peers established on these smaller, less entrenched services.

### Regulatory guidance

When eSafety released its regulatory guidance in September 2025, we committed to review the guidance by June 2026. We will seek feedback from key stakeholders to inform any update in mid-2026.

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## Taking a holistic approach

We know that all online platforms have risks. The SMMA obligation is one part of a broader strategy to make online spaces safer. As the independent regulator for online safety in Australia, eSafety's role is to implement and enforce the Online Safety Act. This includes a number of interconnected measures designed to promote and improve online safety for Australians and reduce online harm, including Online Safety Codes and Standards to safeguard Australians from unlawful and illegal material and prevent children's access and exposure to age-inappropriate content. You can read more about the Online Safety Codes and Standards [on eSafety's website](#).

eSafety also administers complaint schemes under the Online Safety Act which are designed to protect Australians from serious online harm. These include Cyberbullying and Adult Cyber Abuse schemes, which act as safety nets when harmful content remains online after a user has reported it to the platform. We also administer a scheme to address the non-consensual sharing of intimate images. The Online Content Scheme allows Australians to report online material they believe is illegal or should be restricted. Australians can report online abuse and access vital support and resources on [our website](#).

## Progress current investigations

Investigations into five platforms are currently ongoing. This involves eSafety validating the information received through many of the avenues listed in this report, including:

- conducting user testing
- undertaking research
- engaging with platforms, age assurance providers and other key stakeholders
- seeking further information, including through further legally enforceable information-gathering notices where necessary.

eSafety is aiming to finalise at least some of these investigations and make decisions on what, if any, enforcement action is appropriate by mid-2026, depending on the evidence gathered.



