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Client Alert: MOCDA Regulation No. 9/2026 Establishes Stringent Child Protection Requirements for Electronic System Operators

I. Introduction

The Ministry of Communication and Digital Affairs (“**MOCDA**”) has issued the Minister of Communication and Digital Affairs Regulation No. 9 of 2026 (“**MOCDA 9/2026**”) on the implementing regulation for Government Regulation No. 17 of 2025 concerning Electronic System Governance in Child Protection (“**GR 17/2025**”).

This new regulation represents a significant paradigm shift in Indonesia’s digital framework by establishing stringent child protection requirements for Electronic System Providers (*Penyelenggara Sistem Elektronik*, “**ESPs**”). The regulation introduces minimum age classification, age verification mechanisms, parental controls, risk assessment for digital products and services, and enhanced regulatory oversight by MOCDA.

The regulation applies to digital platforms, online services, applications, and other internet-connected products that may be accessed by children. For digital platform operators and technology companies operating in Indonesia, the regulation introduces new compliance requirements and potential administrative sanctions for non-compliance. Companies are therefore advised to review their platform design, user onboarding processes, and content moderation systems.

This regulation came into effect on 7th March 2026, with the implementation phase beginning on 28th March 2026, during which the accounts of children under the age of 16 on high-risk digital platforms will be deactivated.

II. Key Points

A. Minimum Age Requirement and Classification

MOCDA 9/2026 introduces a structured age classification framework for children accessing digital products, services, and features.

This regulation defines a child as any individual under the age of 18 (eighteen). ESPs must specify the minimum age permitted to access their products or services, with the lowest permissible threshold being 3 (three) years old. This regulation also establishes the following age classifications:

- a. 3 (three) - 5 (five) years;
- b. 6 (six) - 9 (nine) years;
- c. 10 (ten) - 12 (twelve) years;
- d. 13 (thirteen) - 15 (fifteen) years;
- e. 16 (sixteen) - under 18 (eighteen) years;

Digital products and features must be designed and configured according to these age ranges, taking into account children’s developmental needs and safety considerations. In addition, platforms are prohibited from targeting or designing products specifically for children under 3 (three) years old.

B. Mandatory Age Verification

ESPs are required to implement mechanisms to verify whether a user is a child and ensure compliance with relevant age restrictions. These verification mechanisms must include:

- a. Technical and operational processes to verify user age with the minimum requirements;

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- b. Verification processes through applicable technology that is developed internally or through third-party service providers that remain compliant with the regulation.

The MOCDA may also designate certain approved technologies for age verification deemed reliable for regulatory purposes. For companies operating digital platforms, this requirement may necessitate the adaptation of age assurance technologies, identity verification tools, or parental authentication mechanisms.

C. Parental Control

The regulation introduces obligations for ESPs to provide parental supervision mechanisms where children may interact with other users. In conditions where ESPs provide products, services, or features that allow children to come into contact with unknown individuals, ESPs must provide parental control technology. This technology enables parents or guardians to approve or refuse a child's ability to interact with unknown users.

In addition, ESPs that require users to register or create an account in order to access their products, services, or features must ensure that appropriate technology and operational measures are in place to allow parents or guardians to effectively supervise the child's use of such products, services, or features through the child's account.

ESPs that require account registration must also comply with the following minimum age requirements:

- a. Children under the age of 13 (thirteen) may only have accounts on products, services, or features specifically designed for children and classified as low risk, with parental consent.
- b. Children aged 13 (thirteen) - 16 (sixteen) may only use services classified as low risk, with parental consent.
- c. Children aged 16 (sixteen) - 18 (eighteen) may create accounts with parental consent.

Furthermore, ESPs must ensure that information regarding the minimum age requirement for accessing their products, services, or features is communicated in clear and easily understandable language and presented in a format that can be easily accessed and understood by children and their parents or guardians.

D. Self-Assessment and Reporting Requirements

The regulation also introduces a risk-based framework for products, services, and features that may be used or accessed by children.

In order to determine the applicable level of risk to children, ESPs are required to conduct a self-assessment covering all relevant aspects of the products, services, and features they develop and/or provide. The assessment must include products, services, and features specifically designed for children as well as those that may potentially be accessed by children.

The risk assessment must take into account several factors, including:

- a. the possibility of children interacting with unknown individuals;
- b. exposure to pornographic content, violent content, content that may endanger life or safety, and other content that is not appropriate for children;
- c. the potential exploitation of children as consumers;
- d. risks to the security of children's personal data;
- e. the potential to cause addiction;

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- f. potential psychological health impacts on children; and
- g. potential physiological impacts on children.

Following the completion of the self-assessment, ESPs must submit the results of the assessment, together with supporting evidence, to the MOCDA through the Director General.

Based on the results of the assessment, digital services will be categorized as follows:

- a. High-risk services, where one or more risk factors are considered significant.
- b. Low-risk services, where all risk factors are assessed as low risk.

In submitting the report, ESPs are legally responsible for ensuring that all statements, data, information, and supporting documents provided are accurate, complete, and not misleading. Any inaccurate or misleading information submitted in the self-assessment report may result in administrative sanctions under the applicable regulations governing electronic system governance for child protection and/or referral to law enforcement authorities.

E. Obligations for Social Networking and Social Media Services Classified as High Risk

The regulation specifically addresses social networking and social media platforms as high-risk services, unless determined otherwise by the MOCDA following verification.

Social networking and social media services are defined as services that meet the following conditions:

- a. enabling social interaction in an online network between two or more users;
- b. allowing users to connect or interact with some or all other users; and/or
- c. allowing users to upload materials or content to the products, services, or features.

In order to comply with the minimum age requirements for child users, ESPs that provide products, services, or features classified as high-risk services must deactivate accounts belonging to users under the age of 16.

III. Conclusion

MOCDA Regulation No. 9 of 2026 introduces a comprehensive child protection framework for digital platforms in Indonesia, strengthening the regulatory obligations of Electronic System Providers in line with Government Regulation No. 17 of 2025. The regulation establishes structured age classifications, mandatory age verification mechanisms, parental supervision requirements, and a risk-based framework for assessing digital products, services, and features that may be accessed by children. These measures reflect the government's effort to ensure that digital platforms adopt responsible design, governance, and safety standards for protecting child users in the digital environment.

For digital platform operators and technology companies operating in Indonesia, the regulation introduces new compliance obligations that may require adjustments to platform design, user onboarding systems, content moderation practices, and internal governance processes. Companies should assess whether their products or services fall within the high-risk category, conduct the required self-assessment, and ensure that appropriate age verification and parental control mechanisms are implemented. Early preparation will be important to align with the implementation timeline and to reduce potential regulatory exposure.

Further Information and Assistance

For more detailed advice or assistance, please contact our legal team with expertise in Indonesian Technology, Media, and Telecommunication (TMT), Data Privacy, and Intellectual Property services institutions:



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