

Legal Restrictions on Children's Access to Social Media in Indonesia: Comparative Study and Policy Adoption from Several Countries

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ABSTRACT

The purpose of this study is to address the risks associated with children's excessive use of social media in Indonesia, where children are exposed to mental health problems like anxiety, depression, and developmental delays due to the country's rapid digital growth. However, laws regarding age restrictions, verification, parental consent, and platform responsibilities are still inconsistent. It employs a normative juridical approach in conjunction with a comparative study of laws in the US, Malaysia, Singapore, China, South Korea, France, Australia, and the UK. These laws include safety-by-design requirements, screen-time limits, age-appropriate designs, real-name systems, and parental controls, among other preventive measures. The findings indicate that Indonesia has a significant regulatory gap, with no specific framework for protecting children online and weak connections between legislation, health data, and initiatives to promote digital literacy. This demonstrates how Indonesia's attention on cybercrime is inadequate in comparison to proactive worldwide approaches. To sum up, Indonesia need a comprehensive reform of its policies. Mapping global trends, identifying local deficiencies, and putting forth a child-centered plan based on the Constitution, Pancasila, and the child's best interests that combines legal reforms, platform accountability, parental advice, and national literacy programs are all part of the impact.

Keywords: *Child Protection, Social Media Regulation, Digital Governance, Comparative Law, Indonesia*

INTRODUCTION

The way kids connect, study, and socialize in today's world has changed due to the quick development of digital technology. Social media platforms are now an essential aspect of daily life, giving kids unparalleled access to a wealth of information and online interactions.¹ However, there are now significant worries about children's psychological health due to the growing usage of social media,² both digital vulnerability and safety. Excessive use of digital platforms has been linked to a number of risks, including cyberbullying, online exploitation, digital addiction, and mental health disorders in children and adolescents, according to international organizations like the World Health Organization (WHO) and the United Nations Children's Fund (UNICEF).³

¹ Boyd, D. (2014). *It's complicated: The social lives of networked teens*. Yale University Press. <https://doi.org/10.12987/yale/9780300166316.001.0001>

² George, M., & Odgers, C. (2015). Seven fears and the science of how mobile technologies affect adolescents. *Perspectives on Psychological Science*, 10(6), 832–851. <https://doi.org/10.1177/1745691615596788>

³ Kuss, D. J., & Griffiths, M. D. (2017). Social networking sites and addiction: Ten lessons learned. *International Journal of Environmental Research and Public Health*, 14(3), 311. pp.1–17. <https://doi.org/10.3390/ijerph14030311>

Similar trends are being seen in Indonesia, where social media usage and internet penetration are both rapidly increasing. Health authorities have issued a warning regarding the rising prevalence of mental health issues among children linked to excessive social media use, including anxiety, depression, and developmental disorders like speech delay. Recent reports show that an increasing number of Indonesian children are actively using social media platforms at younger ages. Concerns about children being exposed to hazardous online content, such as cyberbullying, pornography, and online gambling, have also been brought up by official pronouncements and media reports. These developments show that, in the absence of adequate regulatory protection, children in Indonesia are increasingly exposed to digital threats.⁴

The necessity of bolstering digital kid safety regulations is further supported by empirical data. According to the World Health Organization (WHO), one in seven teenagers globally suffers from mental health illnesses, many of which are linked to excessive digital exposure, cyberbullying, and social pressures.⁵ According to UNICEF data, millions of children and teenagers are gaining access to digital platforms at ever-younger ages, making them one of the fastest-growing groups of internet users worldwide.⁶ Similar issues have been brought up by national authorities in Indonesia. According to reports from the Indonesian Ministry of Health, children and adolescents are experiencing an increasing number of mental health problems, such as anxiety, behavioral challenges, and developmental disorders associated with excessive gadget use. Additionally, Indonesian youngsters are among the most active internet users in Southeast Asia, regularly using social media sites for long periods of time every day, according to data from the Ministry of Communication and Information Technology (Kominfo). These empirical results highlight the need for a more thorough and preventive digital governance framework since they show that children's digital participation is growing quickly while there are still few regulatory measures in place to guarantee their safety.⁷

According to claims in Indonesian media, youngsters in Indonesia are seeing an increase in mental health issues as a result of their increased usage of social media. According to Budi Gunadi Sadikin, the Indonesian Minister of Health, children who use social media excessively are more likely to suffer from mental illnesses, including melancholy and anxiety disorders. The need for speech therapy services has increased as a result of health authorities' observations of developmental problems in children, including delays in linguistic and communicative skills, in addition to psychological disorders. These results show that children's emotional stability and cognitive development can be adversely affected by unrestrained social media use, underscoring the critical need for stricter regulations, digital literacy, and parental supervision to safeguard children's mental health in the digital age.⁸

Indonesia still lacks a thorough legal framework that expressly controls children's access to social media platforms, despite the issue's increasing seriousness. The majority of current regulations concentrate on preventing cybercrime and protecting children in general, but they do not provide explicit platform accountability obligations, effective age verification, mandatory parental consent, or minimum age restrictions for safeguarding children in digital environments. Children can therefore readily access social media sites without enough oversight or verification procedures, mainly depending on easily manipulated self-reported age information.⁹

On the other hand, a number of nations have started enacting more stringent laws to safeguard minors online. These regulations include screen time restrictions, parental authorization requirements, age verification systems, platform safety-by-design requirements, and digital literacy programs meant to reduce the risks that children face when using the internet. The development of these legislative frameworks indicates a growing understanding on a worldwide scale that a comprehensive and integrated policy approach is necessary for children's digital protection.¹⁰

⁴ UNICEF. (2021). *The State of the World's Children 2021*. pp.45-67. <https://doi.org/10.18356/9789210017138>

⁵ Anderson, M., & Jiang, J. (2018). *Teens, Social Media & Technology*. Pew Research Center.

⁶ Hale, L., & Guan, S. (2015). Screen time and sleep among children and adolescents. *Sleep Medicine Reviews*, 21, 50–58. <https://doi.org/10.1016/j.smrv.2014.07.007>

⁷ World Health Organization. (2021). *Adolescent mental health*. pp.1-12. <https://doi.org/10.2471/BLT.20.270421>

⁸ Syakirun Ni'am, Akhdi Martin Pratama, Banyak Anak Indonesia Alami Gangguan Mental karena Media Sosial, <https://nasional.kompas.com/read/2025/02/02/15215161/banyak-anak-indonesia-alami-gangguan-mental-karena-media-sosial>, diakses pada tanggal 7 Maret 2026

⁹ Winther, D. K. (2017). How does the time children spend using digital technology impact their mental well-being, social relationships and physical activity? An evidence-focused literature review. *Innocenti Discussion Papers*, (indipa925).

¹⁰ Rahamathulla, M. (2021). Cyber safety of children in the Association of Southeast Asian Nations (ASEAN) region: A critical review of legal frameworks and policy implications. *International journal on child maltreatment: research, policy and practice*, 4(4), 375-400.

Thus, the purpose of this study is to use a comparative legal method to examine how Indonesia regulates children's use to social media. This study aims to identify regulatory gaps in Indonesia and provide a policy model that can improve legal protection for children in the digital age by analyzing regulatory frameworks in other countries and comparing them with Indonesia's current legislation.¹¹

By providing both a normative reconstruction of Indonesia's legal framework and a comparative policy transfer model for controlling children's access to social media, this study aims to go beyond descriptive discussions on children's online safety. By critically reinterpreting current Indonesian legal norms pertaining to child protection, electronic information governance, and digital rights, the study first adds to the body of literature through normative reconstruction. Children's access to social media is not specifically regulated by current laws like the Electronic Information and Transactions Law and the Child Protection Law, although they do contain basic guidelines for safeguarding children. Within the larger constitutional mandate to protect children's rights, this study reconstructs these disjointed sections into a more cohesive normative framework that specifically addresses minimum age requirements, parental authorization, platform responsibility, and digital safety obligations.

Second, by methodically analyzing regulatory models put in place in countries like the United States, Malaysia, Singapore, China, South Korea, Australia, and the United Kingdom, the study presents a comparative policy transfer strategy. The study examines how various nations operationalize child protection in digital settings through mechanisms like age verification systems, safety-by-design standards, parental permission regimes, and platform governance duties rather than just comparing legal provisions. In order to create a workable regulatory model that combines international best practices with Indonesia's constitutional principles and socio-legal circumstances, these comparative insights are then modified for the Indonesian legal setting.

This study suggests an integrated regulatory framework with four interconnected pillars: legal regulation, platform accountability, parental supervision, and digital literacy. It does this by combining normative reconstruction with comparative policy transfer. In addition to addressing the current research gap in Indonesian legal scholarship concerning children's access to social media, this multifaceted approach offers a policy-oriented contribution to the development of digital governance that puts children's best interests first in the digital age.

LITERATURE REVIEW

A key tenet of international child protection legislation is the "best interests of the child" doctrine, which emphasizes that the welfare and well-being of children must come first in all institutional decisions, legal frameworks, and policies that affect them. The United Nations Convention on the Rights of the Child, in especially Article 3, which states that the best interests of the child shall be the top priority in all decisions concerning children, is where this theory is most clearly expressed. This theory mandates that governments and regulatory agencies safeguard children from online harms like exploitation, dangerous content, and privacy violations in the context of digital environments. Therefore, governments must strike a balance between the need to protect children's physical, psychological, and social development and their rights to receive information and engage in digital environments while regulating their access to social media platforms.

A paradigm for comprehending how governments control and oversee digital technologies, online platforms, and internet-based social interactions is provided by digital governance theory. Digital governance acknowledges that the digital ecosystem involves a variety of actors, including governments, tech firms, civil society organizations, and international organizations, in contrast to traditional regulatory frameworks that exclusively rely on state authority. Digital governance places a strong emphasis on cooperative regulatory strategies in the context of social media regulation, integrating legislative regulation, platform regulations, technology tools, and public scrutiny. This viewpoint emphasizes the significance of adaptive governance structures that can react to the quick development of digital technology, especially when it comes to tackling new threats that children face in online settings.

Platform accountability theory, which contends that digital platforms ought to be held accountable for the social and legal ramifications of the services they offer, is closely tied to digital governance. Social media firms have an

¹¹ Al-Bohari, M. A. (2025). Dynamics of Regulatory and Policy Changes in Child Custody in Indonesia and Malaysia: A Comparative Analysis in Responding to Modern Family Issues. *Journal of Islamic Mubādalāh*, 135-156. <https://doi.org/10.70992/743j3e88>

obligation to put in place safeguards against harmful content and protect vulnerable users, particularly children, because they have a significant influence on digital communication, information flows, and user behavior. Mechanisms like age verification systems, content moderation guidelines, transparency standards, and public bodies' regulatory control can all be part of platform accountability. In this way, the theory recognizes that the private sector, which runs digital platforms, has substantial technological competence and control over digital infrastructure, and it transfers some of the regulatory responsibility from the state alone to this sector.

In the meantime, regulatory state theory clarifies how the state's role in contemporary governance has changed, especially in industries with intricate economic and technological operations. The regulatory state concentrates on creating legal frameworks, standards, and oversight organizations that govern and monitor the actions of private actors rather than directly overseeing every facet of a sector. According to this idea, governments primarily serve as regulators in the context of digital platform regulation, establishing guidelines, enforcing adherence to them, and ensuring that tech firms conduct themselves in a way that serves the public interest. When it comes to controlling children's access to social media, the regulatory state approach places a strong emphasis on the creation of explicit legal requirements for platforms, impartial oversight organizations, and enforcement systems that guarantee the safety and responsibility of digital spaces for young users.

The discussion naturally expands to the idea of digital kid protection within the larger information society, building upon these theoretical underpinnings. In modern society, the idea of child protection has changed due to the advent of digital technology. Child protection has traditionally concentrated on social and physical settings, but the growth of digital platforms has produced new vulnerabilities that need for changes to laws and regulations. The term "digital child protection" refers to legal, social, and technological measures intended to protect kids from dangerous content, exploitation, and psychological hazards when they are online. Because children frequently lack the cognitive maturity to evaluate online hazards, scholars contend that the digital environment presents distinct risks, making them more susceptible to manipulation and exploitation. Additionally, social media platforms' algorithmic design frequently promotes prolonged participation, which may result in addictive behaviors and detrimental effects on young users' mental health.

Regulations Concerning Children's Access to Social Media Diverse nations have implemented diverse regulation strategies to tackle the hazards linked to children's usage of social media. These strategies typically fall into three main categories: platform accountability models, which impose legal obligations on social media companies to protect young users; age-based regulatory systems, which limit platform access below specific age thresholds; and parental control mechanisms, which require parental consent for minors to create social media accounts. Age-based systems may contain verification procedures to guarantee compliance and usually establish minimum age criteria for using digital platforms. The responsibility of parents or guardians in approving and monitoring their children's online activity is emphasized by parental control frameworks. Platform accountability models mandate that digital service providers incorporate safety-by-design measures, such as content screening tools, privacy-by-default settings, and restrictions on minors' targeted advertising and profiling. These legislative approaches seek to strike a compromise between safeguarding children and maintaining technology innovation and digital liberties.

Over the past ten years, research on social media's effects on kids has increased dramatically, with numerous academics looking at how digital platforms affect kids' behavioral development, social interaction, and psychological health. Prior research has typically concentrated on topics like cyberbullying, digital addiction, exposure to hazardous online content, and the connection between teenage mental health concerns and excessive social media use.¹² Growing worries about children's susceptibility in digital environments have been brought to light by a number of worldwide research, which demonstrate that unrestricted access to social media may lead to higher levels of anxiety, sadness, sleep difficulties, and decreased in-person social engagement. Other studies have examined digital child protection from the viewpoints of online safety and digital literacy, highlighting the significance of teaching kids and parents about responsible internet use and preventative measures to limit exposure to dangerous content. Nevertheless, these

¹² Best, P., Manktelow, R., & Taylor, B. (2014). Online communication and adolescent well-being. *Children and Youth Services Review*, 41, 27–36. <https://doi.org/10.1016/j.childyouth.2014.03.001>

strategies frequently place more emphasis on social and educational initiatives than on thorough regulatory frameworks.¹³

The material that is currently available on children's digital protection in Indonesia often concentrates on internet ethics, cybercrime prevention, and digital literacy initiatives. Although these studies help us understand how digital technology affects society, they seldom thoroughly examine the laws that control children's access to social media. Because of this, the regulatory aspect of digital kid protection in Indonesia is still largely unexplored, especially when it comes to platform requirements, age restrictions, and parental consent. Furthermore, very few studies use a comparative legal approach that looks at how various nations control children's access to social media and what Indonesia might learn from them.¹⁴

In order to place itself within the body of existing literature, this study integrates three analytical dimensions: first, it looks at Indonesia's current legal framework regarding children's digital protection; second, it compares the regulatory policies put in place in various countries; and third, it suggests a comprehensive policy framework that could be used as a model to strengthen Indonesia's legal system in regulating children's access to social media. By using this method, the study fills a research gap that hasn't been well addressed in earlier studies and helps Indonesia strengthen its digital governance and child protection policies.

Few studies explore children's access to social media from a comparative legal and regulatory viewpoint, especially in the Indonesian setting, despite the fact that earlier research has looked at cyberbullying, digital addiction, and children's online safety. Thus, by analyzing global regulatory models and suggesting an integrated policy framework for Indonesia, this study seeks to close this gap.

METHODOLOGY

This paper examines how the law governs children's access to social media and evaluates which regulatory regimes are best suited for bolstering digital child protection in Indonesia using a normative juridical approach in conjunction with comparative legal analysis.¹⁵ By interpreting pertinent regulations, spotting inconsistencies, and assessing whether the current framework sufficiently addresses the risks associated with children's use of social media, the normative juridical method is used to analyze written legal norms, statutory provisions, and doctrinal principles on child protection and digital governance. In addition, Indonesia's regulations are systematically compared to those of the United States, Malaysia, Singapore, China, South Korea, Australia, and the United Kingdom using a comparative legal method. This comparison focuses on how each jurisdiction regulates minimum age, parental consent, age verification technologies, platform accountability, and digital safety governance. In order to capture both doctrinal developments and empirical findings on children's digital experiences, the research relies on primary legal materials (constitutional provisions, statutes, regulations, and official policy documents) and secondary legal materials (journal articles, books, international organization reports, and policy studies) gathered through library research and document analysis. The data are then analyzed using comparative analytical techniques to find similarities, differences, and best practices in foreign regulatory models and to determine their applicability and adaptability to the Indonesian legal context, as well as qualitative doctrinal analysis to evaluate the coherence, scope, and limitations of Indonesia's current regulations. The research goal of developing specific, context-sensitive policy recommendations for a more comprehensive digital child protection framework in Indonesia is directly linked to each analytical step in this methodological design, including normative interpretation, cross-jurisdictional comparison, and doctrinal evaluation.¹⁶

¹³ Odgers, C. L., & Jensen, M. R. (2020). Annual research review: Adolescent mental health in the digital age. *Journal of Child Psychology and Psychiatry*, 61(3), 336–348. <https://doi.org/10.1111/jcpp.13190>

¹⁴ Sihabudin, S. (2023). Expanding the limitations of the protection and processing of children's personal data: An overview of current regulations, challenges, and recommendations. *Brawijaya Law Journal*, 10(1), 59–71.

¹⁵ Ismail, D. E., Ahmad, N., Mantali, A. R. Y., Moha, M. R., & Machmud, A. W. (2025). The Comparative Study: Protecting Children's Rights Through Law Reform of Restorative Justice in Juvenile Cases. *Journal of Law and Legal Reform*, 6(2), 909–950.

¹⁶ Ismail, D. E., Ahmad, N., Mantali, A. R. Y., Moha, M. R., & Machmud, A. W. (2025). The Comparative Study: Protecting Children's Rights Through Law Reform of Restorative Justice in Juvenile Cases. *Journal of Law and Legal Reform*, 6(2), 909–950.

DISCUSSION

Regulation of Children's Access to Social Media in Indonesia

This conversation examines Indonesia's present social media regulations for kids and demonstrates how most of them are vague, disjointed, and not yet adapted to the realities of kids' daily digital lives. There is still a gap between general legal commitments and specific operational guidelines for social media platforms because the Constitution, the Child Protection Law, the ITE Law, and the Pornography Law acknowledge children's rights and the need to protect them from violence, exploitation, and harmful content. However, they do not specify minimum age limits, comprehensive access controls, or explicit platform obligations toward child users.¹⁷

In reality, regulation still mainly relies on self-declared age verification within platform policies and post hoc control of illegal content and cybercrime. As a result, important aspects of digital child protection are essentially delegated to multinational technology companies without a robust, legally enforced accountability framework. Given empirical evidence of an increase in mental health issues, digital addiction, and exposure to high-risk content among Indonesian children, this is becoming more and more problematic. Additionally, specific regulations pertaining to age thresholds, parental consent, screen time, and design governance are just starting to take shape and have not yet fully taken into account children's vulnerabilities in algorithm-driven environments.¹⁸

There is what can be called a normative practical mismatch between the recognition of rights and the concrete structuring of platforms when children are users because the constitutional and statutory guarantees of children's rights have not been fully translated into specialized digital child protection norms that respond to platform architectures, data-driven business models, and cross-border content flows.¹⁹

Simultaneously, the current framework in particular, the Pornography Law, child protection and ITE laws, constitutional guarantees, and more recent child-focused online safety and literacy initiatives provides a normative basis that can support and justify more specific policies on age verification, parental control, and platform accountability. This framework can be further developed by taking a cue from international regulatory models that have already adopted stricter rules on children's use of social media.

Comparative Regulation in Selected Countries

There is a clear trend toward preventive and child-centered regulation that incorporates age verification, parental authorization, platform accountability, and specialized online safety regimes, despite the lack of a single uniform model, according to a comparative study of the regulatory frameworks in the United Kingdom, Australia, China, South Korea, France, the United States, Malaysia, and Singapore. Significantly, distinct protection concerns are emphasized by each jurisdiction: China and South Korea concentrate on behavioral controls like screen time limits, curfews, and identity verification to address digital addiction; France and the United States heavily rely on parental consent and data protection instruments like COPPA as key entry points for regulating children's interactions with platforms; Australia and Singapore strengthen online safety governance through specialized regulators with powers to order content removal and impose duties on platforms; and the United Kingdom's Age Appropriate Design Code places a strong emphasis on data protection and privacy by default.²⁰

When combined, these strategies show that effective digital child protection typically integrates safety, privacy, and behavioral regulation rather than relying on a single legal tool. Additionally, many nations have already gone beyond general child protection clauses by enacting specific laws, binding standards, and codes of practice that directly control platform design, age verification systems, and obligations regarding harmful content. In contrast, Indonesia's regulatory lag reflects both technical shortcomings and the lack of a clear, child-specific digital regulatory paradigm that can direct governance in practice. The country still primarily relies on broad, non-specialized provisions that do

¹⁷ Herman, K. M. S. (2025). The Problem of Social Media Platform Responsibility Regarding Children's Rights in the Digital Space from A Human Rights Perspective. *Jurnal Greenation Sosial dan Politik*, 3(4), 914-922.

¹⁸ Floridi, L. (2018). Soft ethics and the governance of digital technologies. *Philosophy & Technology*, 31(1), 1–8. <https://doi.org/10.1007/s13347-018-0303-9>

¹⁹ Tahir, R., & Lestari, T. Y. (2025). Children's Digital Rights: An In-depth Analysis of Indonesia, Europe, and the US. *Eduvest-Journal of Universal Studies*, 5(2), 1942-1964.

²⁰ Purboningsih, E. R., Massar, K., Hinduan, Z. R., Agustiani, H., Ruiter, R. A., & Verduyn, P. (2025). Parental mediation strategies for social media use: a thematic analysis of perspectives among Indonesian parents and adolescents. *Behaviour & Information Technology*, 44(12), 2838-2859.

not clearly differentiate between adult and child users in terms of access conditions and risk exposure.²¹

Normatively, the foreign models further demonstrate that more robust child protection can be balanced with digital innovation and freedom of expression when regulations are framed around proportionality, the child's best interests, and platform transparency obligations. They also offer strong comparative arguments for Indonesia to institutionalize age verification, parental involvement, and platform responsibility within its own human rights and constitutional framework.²²

Simultaneously, a number of governments have implemented layered policy responses combining data protection regulations, online safety laws, and parental control mechanisms in response to global empirical research on children's digital engagement that highlights the risks to mental health, development, and safety associated with excessive and unregulated platform use. These findings are summarized in Table 1 and include, for instance, evidence on adolescent mental health burdens, elevated depression risk with high daily social media use, and country-specific issues like cyberbullying, digital addiction, and academic decline associated with screen time. Southeast Asia stands out in this larger context due to its highly active youth internet user base, and Indonesian studies highlighting mental health issues and speech delays linked to excessive gadget use highlight the need for stronger digital governance and parental awareness. Additionally, the selection of the aforementioned jurisdictions as comparative benchmarks is justified because they represent a variety of regulatory models, from platform accountability regimes and data protection-driven approaches to behavioral and parental control-oriented systems.²³

While South Korea's high rates of youth digital addiction have led to youth protection digital policies, China's evidence linking excessive screen time to lower academic performance has prompted the imposition of strict screen time limits and identity verification systems on online platforms, and the United Kingdom's findings that approximately one-third of children have experienced cyberbullying have supported the adoption of the Age Appropriate Design Code to strengthen data protection and safety by design duties. Malaysia and Singapore have created online safety monitoring systems and regulatory frameworks to strengthen child protection in digital spaces, France has implemented parental authorization requirements to improve parental control over children's digital activities, and Australia has responded to the growing online harassment of minors with the Online Safety Act.²⁴ Stronger digital governance and parental awareness are urgently needed in Indonesia, where research has linked excessive gadget use to mental health issues and speech delays in children. At the regional level, Southeast Asia is characterized by very high levels of internet engagement among young users, with studies showing that a large majority of children have encountered at least one form of online harm. Overall, the comparison reveals that many nations deal with comparable issues related to children's digital participation; yet, their policy solutions vary based on national priorities and regulatory traditions, which is why the chosen jurisdictions are methodologically relevant: They serve as comparative references for assessing and enhancing Indonesia's own strategy. They reflect a variety of regulatory models of digital kid protection, such as frameworks that prioritize data protection, platform accountability regimes, and systems that prioritize parental control.

Identified Regulatory Gaps in Indonesia

Even though children's exposure to social media is rapidly increasing and their cognitive and psychological capacities differ significantly from adults, treating them under the same formal access conditions goes against the principle of differentiated protection embedded in child protection law. However, the regulatory gaps in Indonesia's legal framework demonstrate that the country has not yet developed a child-specific digital governance paradigm. The legal system effectively transfers crucial access control functions to private platforms by relying on self-declared age information without imposing precise duties, technical standards, or robust enforcement mechanisms, creating a de facto regulatory vacuum at the very point where preventive protection should operate. This is demonstrated by the

²¹ Gasser, U., & Almeida, V. (2017). A layered model for AI governance. *IEEE Internet Computing*, 21(6), 58–62. <https://doi.org/10.1109/MIC.2017.4180835>

²² Twenge, J. M., Joiner, T. E., Rogers, M. L., & Martin, G. N. (2018). Increases in depressive symptoms among adolescents. *Clinical Psychological Science*, 6(1), 3–17. <https://doi.org/10.1177/2167702617723376>

²³ Montag, C., & Walla, P. (2016). Carpe diem instead of losing your social mind. *Cogent Psychology*, 3(1), 1157281. <https://doi.org/10.1080/23311908.2016.1157281>

²⁴ Montag, C., & Walla, P. (2016). Carpe diem instead of losing your social mind. *Cogent Psychology*, 3(1), 1157281. <https://doi.org/10.1080/23311908.2016.1157281>

lack of mandatory and effective age verification mechanisms and the absence of clear and enforceable rules on the minimum age for social media access until very recently.²⁵

Simultaneously, Indonesian regulation has traditionally focused on user behavior and illegal content after harm occurs rather than on the structural risks generated by platform design choices and data-driven business models, which weakens the preventive dimension of child protection in digital spaces. This is demonstrated by the absence of explicit platform level accountability obligations such as requirements for safety by design, child-specific content filtering, or transparency over algorithms that target or profile minors.²⁶ A fragmented, cross-sectoral approach is further revealed by the limited and frequently haphazard integration between legal regulations and digital literacy or online safety education programs: educational initiatives are not consistently anchored in legally binding obligations, nor are they systematically connected to clearly defined responsibilities for platforms and parents, leaving children in highly open digital environments with only partial and uncoordinated safeguards. When taken as a whole, these gaps show that Indonesia's framework still functions at a general and reactive level. In light of comparative practices and larger discussions on internet governance and data protection implementation, these gaps support the claim that Indonesia needs a comprehensive reconfiguration of its digital child protection regime that explicitly regulates access conditions, platform duties, parental roles, and the alignment of legal instruments with educational and literacy measures.

Proposed Policy Model for Indonesia

By structuring reforms around four interrelated pillars—legal regulation, platform accountability, parental supervision, and national digital literacy—the proposed policy model for Indonesia represents a change from a disjointed, reactive approach to a more integrated and preventive framework for digital child protection. By converting general child protection principles into specific, enforceable standards and giving oversight bodies a stronger legal foundation to monitor and penalize noncompliant platforms, the introduction of explicit rules on minimum age for social media access, mandatory parental consent, and clear platform obligations is meant to fill the identified normative vacuum at the legal level.²⁷

In order to incorporate child protection goals into platform architecture in accordance with safety by design developments in jurisdictions like the United Kingdom and Australia, the model calls for robust age verification, default high privacy settings, child-specific content filtering, and less addictive design features. This approach acknowledges that social media companies actively design the digital environments in which children participate. By requiring parental approval for children's accounts and offering useful monitoring tools, the parental supervision pillar, which operates within a state-defined legal framework to better connect household practices to formal regulatory standards, positions parents as co-regulators. It does this by drawing on strategies such as the French parental authorization model.

The digital literacy pillar suggests integrating online safety and responsible digital practices into school curricula and community programs to strengthen children's and parents' ability to manage social media risks in accordance with the child's best interests. It highlights that legal and technical measures must be supported by changes in knowledge, attitudes, and behavior. When combined, these four pillars create an integrated and normatively coherent system that divides responsibilities among the state, platforms, parents, and educational institutions. This system provides an institutionally realistic blueprint for reforming Indonesia's digital child protection regime while adhering to the country's legal framework and drawing on comparative governance insights.

Comparative Policies on Social Media Restrictions for Children

Due to the quick development of digital technology, many nations have implemented laws designed to shield kids from the dangers of using social media. Cyberbullying, online exploitation, exposure to hazardous content, digital addiction, and mental health concerns are some of these risks. As a response, governments all over the world have

²⁵ DeNardis, L. (2014). *The Global War for Internet Governance*. Yale University Press. <https://doi.org/10.12987/yale/9780300169317.001.0001>

²⁶ Judijanto, L., Solapari, N., & Putra, I. (2024). An analysis of the gap between data protection regulations and privacy rights implementation in Indonesia. *The Easta Journal Law and Human Rights*, 3(01), 20-29.

²⁷ Dinata, R. R., Achmad, M., Maryani, D., & Sartika, I. (2025). Evaluation of Governance of Local Government Information System in Ministry of Home Affairs of the Republic of Indonesia. *Journal of Syntax Transformation*, 6(6).

started putting laws into place to control children's access to digital platforms through frameworks for platform responsibility, age verification, and parental consent.²⁸

Regulations pertaining to children's digital safety differ greatly amongst jurisdictions, according to comparative studies. While nations like China and South Korea primarily rely on state-centric regulatory restrictions over digital activities, the United States and the United Kingdom take a rights-based strategy that emphasizes children's privacy and data protection. In the meanwhile, Singapore and Australia use institutional regulatory regimes that directly require digital platforms to protect minors from online danger.

Comparative regulatory approaches show how different legal traditions and policy agendas influence the governance of digital child protection. While the United States adopts a privacy-centric strategy that largely focuses on parental permission processes, European jurisdictions like the United Kingdom stress a rights-based framework centered on children's privacy and data protection. China, on the other hand, uses a state-controlled regulatory approach that is marked by stringent government control over children's online activity. In the meantime, Singapore and Australia have established institutional regulatory frameworks that give specialist online safety regulators and digital platforms major responsibility.

Indonesia still lacks a comprehensive regulatory framework that expressly governs children's access to social media, despite the growing attention given to children's digital protection on a global scale. Children's access to social media sites is not particularly regulated by current laws like the Electronic Information and Transactions Law and the Child Protection Law, which primarily deal with cybercrime and digital misconduct. Numerous important regulatory loopholes are created by this circumstance. First off, there isn't currently a specific law in Indonesia that establishes a minimum age requirement for using social media.

In reality, there are no reliable age verification systems, therefore kids may register accounts with ease. Second, social media businesses are not clearly required by law to employ kid safety measures including content filtering, privacy protection, and algorithm transparency. Third, Indonesia has not yet integrated parental control mechanisms into national digital governance policies, whereas many countries require parental consent for minors' online activities. Fourth, there is still a lack of institutional coordination and fragmentation in digital literacy initiatives designed to shield kids from online threats. In order to identify a complete policy framework that can improve children's digital protection in Indonesia, this research is new in its attempt to combine comparative regulatory analysis with policy design.

A thorough policy framework including several stakeholders is necessary to manage the growing threats that children encounter in digital contexts. Government legislation alone is insufficient for effective digital child protection; parents' active participation and the accountability of digital platforms are also necessary. To guarantee that kids can use digital technology in a responsible and safe manner, it is also crucial to improve their digital literacy. An integrated strategy to digital child protection that entails cooperation between several stakeholders is depicted in the framework shown in Figure 1. Three main pillars are highlighted in the model: parental oversight, platform responsibility, and legislative regulation. By creating minimum age requirements, particular child digital protection legislation, and explicit obligations for digital platforms, legal regulation serves as the cornerstone for digital child safety. These rules are intended to guarantee that online spaces adhere to guidelines created to protect kids from dangerous digital exposure.

Platform accountability, the second pillar, highlights the obligation of IT firms and digital service providers to put safeguards in place. These include content filtering technology that restrict children's access to unsuitable or dangerous content, age verification systems, and privacy protection measures. Platforms can significantly contribute to lowering the risks that young people face when using the internet by enforcing these measures.²⁹

The third pillar is about parental monitoring, which is crucial for directing kids' online activity. Using monitoring tools, controlling screen time to avoid excessive digital consumption, and giving approval for children's online activity

²⁸ Livingstone, S., & Smith, P. (2014). Annual research review: Harm experienced by child users of online technologies. *Journal of Child Psychology and Psychiatry*, 55(6), 635–654. <https://doi.org/10.1111/jcpp.12197>

²⁹ O'Keeffe, G., & Clarke-Pearson, K. (2011). The impact of social media on children. *Pediatrics*, 127(4), 800–804. <https://doi.org/10.1542/peds.2011-0054>

are all examples of parental participation. Active parental involvement minimizes any negative effects while fostering a balanced digital experience for kids.

Digital literacy education, which gives kids the information and abilities they need to securely and responsibly navigate digital environments, strengthens these three pillars even more. Children that are digitally literate are better equipped to assess online content critically, comprehend digital threats, and behave responsibly when using the internet. In the end, a safer and more encouraging digital environment for kids is created through the convergence of legislative frameworks, platform accountability, parental guidance, and digital literacy. By putting out an integrated digital child safety policy model that integrates platform responsibility, legal regulation, parental supervision, and digital literacy within the Indonesian legal framework, this study adds to the body of literature.

CONCLUSION AND RECOMMENDATION

The current legal framework in Indonesia that controls children's access to social media is disjointed, reactive, and mostly indirect. It relies on general provisions for child protection and electronic information, which do not specifically and operationally regulate minimum age, effective age verification, or platform accountability. Other nations have started to implement more proactive and preventive regulatory mechanisms, such as age-based access restrictions, parental consent regimes, screen time limitations, and safety by design obligations for digital platforms, according to a comparative analysis of jurisdictions like the United States, Malaysia, Singapore, China, South Korea, Australia, and the United Kingdom. This disparity highlights a glaring regulatory gap in Indonesia's digital governance, where kids are heavily exposed to the dangers of social media without a thorough framework that incorporates legal requirements, technology protections, parental responsibilities, and digital literacy programs.

Given these results, the study suggests that Indonesia create a specific framework for regulating children's access to social media, either by amending current legislation or by passing a specific digital child protection instrument that establishes minimum age requirements, requires parental consent for minors, and places explicit safety obligations on platforms. Strong platform accountability measures (such as age verification, default high privacy settings, and content filtering for minors), improved parental supervision tools, and a national digital literacy program integrated into the educational system to increase parents' and kids' ability to manage online risks should be added to this framework. The state can create a safer digital environment where children can benefit from social media while minimizing its potential harms by implementing an integrated, multi-pillar policy model that is grounded in Indonesia's constitutional and philosophical commitments to the best interests of the child and inspired by comparative best practices.

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REFERENCES

- Al-Bohari, M. A. (2025). Dynamics of Regulatory and Policy Changes in Child Custody in Indonesia and Malaysia: A Comparative Analysis in Responding to Modern Family Issues. *Journal of Islamic Mubādah*, 135-156. <https://doi.org/10.70992/743j3e88>
- Anderson, M., & Jiang, J. (2018). *Teens, Social Media & Technology*. Pew Research Center.
- Best, P., Manktelow, R., & Taylor, B. (2014). Online communication and adolescent well-being. *Children and Youth Services Review*, 41, 27–36. <https://doi.org/10.1016/j.childyouth.2014.03.001>
- Boyd, D. (2014). *It's complicated: The social lives of networked teens*. Yale University Press. <https://doi.org/10.12987/yale/9780300166316.001.0001>
- DeNardis, L. (2014). *The Global War for Internet Governance*. Yale University Press. <https://doi.org/10.12987/yale/9780300169317.001.0001>
- Dinata, R. R., Achmad, M., Maryani, D., & Sartika, I. (2025). Evaluation of Governance of Local Government Information System in Ministry of Home Affairs of the Republic of Indonesia. *Journal of Syntax Transformation*, 6(6).

- Floridi, L. (2018). Soft ethics and the governance of digital technologies. *Philosophy & Technology*, 31(1), 1–8. <https://doi.org/10.1007/s13347-018-0303-9>
- Gasser, U., & Almeida, V. (2017). A layered model for AI governance. *IEEE Internet Computing*, 21(6), 58–62. <https://doi.org/10.1109/MIC.2017.4180835>
- George, M., & Odgers, C. (2015). Seven fears and the science of how mobile technologies affect adolescents. *Perspectives on Psychological Science*, 10(6), 832–851. <https://doi.org/10.1177/1745691615596788>
- Hale, L., & Guan, S. (2015). Screen time and sleep among children and adolescents. *Sleep Medicine Reviews*, 21, 50–58. <https://doi.org/10.1016/j.smrv.2014.07.007>
- Herman, K. M. S. (2025). The Problem of Social Media Platform Responsibility Regarding Children's Rights in the Digital Space from A Human Rights Perspective. *Jurnal Greenation Sosial dan Politik*, 3(4), 914-922.
- Ismail, D. E., Ahmad, N., Mantali, A. R. Y., Moha, M. R., & Machmud, A. W. (2025). The Comparative Study: Protecting Children's Rights Through Law Reform of Restorative Justice in Juvenile Cases. *Journal of Law and Legal Reform*, 6(2), 909-950.
- Ismail, D. E., Ahmad, N., Mantali, A. R. Y., Moha, M. R., & Machmud, A. W. (2025). The Comparative Study: Protecting Children's Rights Through Law Reform of Restorative Justice in Juvenile Cases. *Journal of Law and Legal Reform*, 6(2), 909-950.
- Judijanto, L., Solapari, N., & Putra, I. (2024). An analysis of the gap between data protection regulations and privacy rights implementation in Indonesia. *The Easta Journal Law and Human Rights*, 3(01), 20-29.
- Kuss, D. J., & Griffiths, M. D. (2017). Social networking sites and addiction: Ten lessons learned. *International Journal of Environmental Research and Public Health*, 14(3), 311. pp.1–17. <https://doi.org/10.3390/ijerph14030311>
- Livingstone, S., & Smith, P. (2014). Annual research review: Harm experienced by child users of online technologies. *Journal of Child Psychology and Psychiatry*, 55(6), 635–654. <https://doi.org/10.1111/jcpp.12197>
- Montag, C., & Walla, P. (2016). Carpe diem instead of losing your social mind. *Cogent Psychology*, 3(1), 1157281. <https://doi.org/10.1080/23311908.2016.1157281>
- Montag, C., & Walla, P. (2016). Carpe diem instead of losing your social mind. *Cogent Psychology*, 3(1), 1157281. <https://doi.org/10.1080/23311908.2016.1157281>
- O'Keeffe, G., & Clarke-Pearson, K. (2011). The impact of social media on children. *Pediatrics*, 127(4), 800–804. <https://doi.org/10.1542/peds.2011-0054>
- Odgers, C. L., & Jensen, M. R. (2020). Annual research review: Adolescent mental health in the digital age. *Journal of Child Psychology and Psychiatry*, 61(3), 336–348. <https://doi.org/10.1111/jcpp.13190>
- Purboningsih, E. R., Massar, K., Hinduan, Z. R., Agustiani, H., Ruiter, R. A., & Verduyn, P. (2025). Parental mediation strategies for social media use: a thematic analysis of perspectives among Indonesian parents and adolescents. *Behaviour & Information Technology*, 44(12), 2838-2859.
- Rahamathulla, M. (2021). Cyber safety of children in the Association of Southeast Asian Nations (ASEAN) region: A critical review of legal frameworks and policy implications. *International journal on child maltreatment: research, policy and practice*, 4(4), 375-400.
- Sihabudin, S. (2023). Expanding the limitations of the protection and processing of children's personal data: An overview of current regulations, challenges, and recommendations. *Brawijaya Law Journal*, 10(1), 59-71.
- Syakirun Ni'am, Akhdi Martin Pratama, Banyak Anak Indonesia Alami Gangguan Mental karena Media Sosial, <https://nasional.kompas.com/read/2025/02/02/15215161/banyak-anak-indonesia-alami-gangguan-mental-karena-media-sosial>, diakses pada tanggal 7 Maret 2026
- Tahir, R., & Lestari, T. Y. (2025). Children's Digital Rights: An In-depth Analysis of Indonesia, Europe, and the US. *Eduvest-Journal of Universal Studies*, 5(2), 1942-1964.
- Twenge, J. M., Joiner, T. E., Rogers, M. L., & Martin, G. N. (2018). Increases in depressive symptoms among adolescents. *Clinical Psychological Science*, 6(1), 3–17. <https://doi.org/10.1177/2167702617723376>
- UNICEF. (2021). The State of the World's Children 2021. pp.45-67. <https://doi.org/10.18356/9789210017138>
- Winther, D. K. (2017). How does the time children spend using digital technology impact their mental well-being, social relationships and physical activity? An evidence-focused literature review. *Innocenti Discussion Papers*, (indipa925).
- World Health Organization. (2021). Adolescent mental health. pp.1-12. <https://doi.org/10.2471/BLT.20.270421>

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