

Protecting Minors or Straining Rights? A Constitutional and Comparative Impact Assessment of Indonesia's PP Tunas

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Abstract

In March 2025 Indonesia enacted Government Regulation No. 17 of 2025 on the Governance of Electronic System Operations for Child Protection, popularly known as PP Tunas, with enforcement following in March 2026 alongside its implementing instrument, Ministerial Regulation No. 9 of 2026. The measure restricts minors' access to digital platforms through a graduated, risk-based scheme rather than a blanket ban, and is frequently presented as a more sophisticated regional response than the under-sixteen prohibitions adopted in Australia and Malaysia. This article offers a legal and impact-assessment commentary on the Regulation. It proceeds doctrinally and comparatively, situating the measure within the hierarchy of Indonesian legal sources, testing it against the constitutional guarantees of Articles 28C, 28F and 28J of the 1945 Constitution, and assessing its likely effects across three axes: technical-institutional feasibility, the protection of minors, and market structure. The analysis finds that Indonesia's difficulty lies less in the existence of protective norms than in the unfinished translation of those norms into operable, auditable standards, and that several of the Regulation's own commands stand in unresolved tension with one another. The comparative survey of Indonesia, Australia and Malaysia shows that no jurisdiction has yet reconciled child protection, privacy and technical feasibility, and that Indonesia's graduated model carries both a genuine advantage in proportionality and a distinctive set of implementation risks.

Keywords: child online protection; digital governance; age assurance; constitutional law; data protection; Indonesia

1. Introduction

1.1 Introduce the Problem

The accelerating participation of children in Indonesia's digital environment has turned their online safety from a parental concern into a question of public regulation. Official figures cited in recent scholarship indicate that roughly half of Indonesian internet users are under the age of eighteen, and that exposure to grooming, harassment, fraud and sexual exploitation is not marginal but routine (Cahyaningsih & Sasono, 2026). Public opinion has largely welcomed intervention, even as commentators have questioned the State's technical capacity and the risk of overreach (Nurjaman, 2025). It is against this background that the Government enacted PP Tunas, a measure that shifts the burden of protection from families onto platform operators and that the responsible ministry has described as a response to a digital emergency.

Indonesia's response reflects a broader international trend in which governments increasingly intervene to regulate children's access to digital platforms. Rather than adopting a

blanket prohibition, PP Tunas introduces a graduated and risk-based regulatory model that differentiates restrictions according to both the age of the user and the level of platform risk. The Regulation has therefore attracted considerable attention because it is frequently presented as a more proportionate alternative to the stricter minimum-age approaches adopted by neighbouring jurisdictions.

Nevertheless, the adoption of PP Tunas has also generated significant legal and institutional questions. While its protective objective has received broad support, uncertainty remains regarding the coherence of its implementation framework, the proportionality of the restrictions it imposes, and the institutional capacity required to enforce its provisions effectively. These questions place PP Tunas at the intersection of constitutional rights, digital governance, child protection, and platform regulation.

1.2 Explore Importance of the Problem

The significance of PP Tunas extends beyond the immediate regulation of children's access to social media. The Regulation represents one of Indonesia's most ambitious attempts to reconcile competing constitutional interests: protecting minors from documented online harms while preserving fundamental rights to information, communication, and privacy guaranteed under the 1945 Constitution.

The urgency of this balance is amplified by the rapid expansion of Indonesia's digital population and by increasing concern regarding online grooming, harassment, fraud, sexual exploitation, and other forms of harm affecting minors. At the same time, regulatory interventions in digital spaces inevitably raise concerns regarding proportionality, administrative legality, privacy protection, and the limits of executive power. Consequently, assessing PP Tunas requires more than evaluating its policy objectives; it also requires examining whether the legal instrument adopted is internally coherent, constitutionally justified, and practically enforceable.

A recurring observation runs throughout this assessment. The principal weakness of PP Tunas is not the absence of a protective mandate, which Indonesian law amply supplies, but the indeterminacy of the operational layer that would make that mandate enforceable. That indeterminacy cuts in two directions simultaneously, leaving children inadequately protected where regulatory standards remain vague while imposing substantial compliance burdens on electronic system operators where obligations are insufficiently defined. This pattern reappears throughout the Regulation's design and forms the central analytical theme of the present assessment.

1.3 Describe Relevant Scholarship

Recent scholarship has extensively documented both the necessity and the complexity of regulating children's online environments. Studies have consistently reported the prevalence of online grooming, cyber harassment, fraud, and sexual exploitation among Indonesian minors, thereby providing empirical justification for stronger regulatory intervention (Cahyaningsih & Sasono, 2026). Public responses to proposed restrictions have generally supported stronger child protection measures, although commentators have simultaneously questioned Indonesia's institutional readiness, technical capacity, and the possibility of excessive governmental intervention (Nurjaman, 2025).

The legal framework supporting PP Tunas has likewise evolved considerably during the past several years. The Regulation derives principally from the second amendment to the Electronic Information and Transactions Law enacted through Law No. 1 of 2024, particularly Articles 16A and 16B, which introduced explicit obligations requiring electronic system operators to protect children within digital environments. These provisions complement Law No. 27 of 2022 concerning Personal Data Protection, which classifies children's personal data as requiring enhanced protection and subjects all processing activities to the principles of purpose limitation and data minimisation.

Implementation has subsequently been elaborated through Ministerial Regulation No. 9 of 2026, issued by the Minister of Communication and Digital Affairs. This implementing regulation establishes operational requirements governing age classification and verification, platform risk profiling and self-assessment, parental supervision mechanisms, and supervisory and enforcement procedures (Tech for Good Institute, 2026). More broadly, the Regulation reflects Indonesia's continuing transition from framework-based digital legislation toward increasingly detailed platform governance (Tech for Good Institute, 2025).

Although the introduction of Ministerial Regulation No. 9 of 2026 addressed earlier criticism that PP Tunas lacked implementing rules, scholarly debate has shifted toward a different question. Rather than asking whether implementing regulations exist, recent commentary focuses on whether those rules provide sufficiently coherent, measurable, and auditable standards capable of supporting consistent enforcement. This unresolved issue provides an important foundation for the present analysis.

1.4 Purpose of the Study and Research Approach

This article offers a legal and impact-assessment commentary on PP Tunas. It does not attempt an empirical evaluation of compliance outcomes, which the currently available public evidence would not yet support. Instead, the article proceeds through doctrinal legal analysis by examining the Regulation within Indonesia's hierarchy of legal norms and assessing its consistency with the constitutional guarantees contained in Articles 28C, 28F, and 28J of the 1945 Constitution. The analysis is complemented by a comparative legal perspective that situates Indonesia's regulatory approach alongside the corresponding legislative developments adopted by Australia and Malaysia.

The assessment is organised around three interconnected analytical dimensions. The first examines the technical and institutional feasibility of implementing the regulatory framework. The second evaluates the Regulation's consequences for the minors whom it seeks to protect. The third considers its implications for market structure and for the electronic system operators responsible for compliance.

The scope of the article is deliberately limited. Rather than determining whether restricting children's access to social media constitutes desirable public policy, the analysis addresses the narrower legal question of whether the chosen regulatory instrument is internally coherent, constitutionally proportionate, and capable of practical implementation. Through this approach, the article seeks to contribute to the emerging literature on constitutional digital governance and child online protection by evaluating not only the protective ambitions of PP Tunas but also the institutional architecture upon which its effectiveness ultimately depends.

2. Method

This study employs a doctrinal legal research approach complemented by constitutional analysis, comparative legal analysis, and impact assessment. Rather than seeking to measure empirical compliance outcomes, the article examines PP Tunas as a legal instrument within Indonesia's constitutional and statutory framework, assessing both its normative coherence and its likely practical consequences. An empirical evaluation is deliberately avoided because the Regulation has only recently entered its implementation phase, and publicly available evidence is not yet sufficient to support reliable conclusions regarding compliance or effectiveness.

The doctrinal component of the research analyses PP Tunas within the hierarchy of Indonesian legal sources. Particular attention is given to its legal status as a Government Regulation (Peraturan Pemerintah), its relationship with its enabling legislation, namely Law No. 1 of 2024 concerning the second amendment to the Electronic Information and Transactions Law and Law No. 27 of 2022 concerning Personal Data Protection, as well as its implementing instrument, Ministerial Regulation No. 9 of 2026. The analysis further evaluates whether the delegated regulatory framework remains consistent with constitutional guarantees and principles governing executive rule-making under Indonesian administrative law

To assess constitutional validity, the article applies a proportionality-based constitutional analysis centred on Articles 28C, 28F, and 28J of the 1945 Constitution. These constitutional provisions establish the right to obtain and disseminate information while simultaneously permitting restrictions imposed by law for legitimate public interests, including the protection of the rights of others. The constitutional assessment therefore examines whether PP Tunas appropriately balances the objective of protecting minors with the preservation of fundamental rights relating to information, communication, privacy, and legal certainty.

The study also adopts a comparative legal approach by examining similar regulatory developments in Australia and Malaysia. The comparison focuses on the respective legislative models governing children's access to digital platforms, the different approaches to age verification, and the institutional mechanisms adopted for implementation and enforcement. Rather than identifying a superior regulatory model, the comparative assessment seeks to identify common challenges concerning proportionality, privacy protection, technical feasibility, and regulatory effectiveness across jurisdictions confronting similar policy problems.

The impact assessment constitutes the second analytical framework employed throughout the article. Instead of measuring observable outcomes, it evaluates the probable implications of the Regulation based on its legal architecture and institutional design. The assessment is organised around three interrelated dimensions. First, it considers the technical and institutional feasibility of implementing the regulatory framework, including age-verification mechanisms, supervisory arrangements, data governance, and enforcement capacity. Second, it examines the Regulation's likely consequences for the minors it seeks to protect, paying particular attention to vulnerable groups, parental consent mechanisms, and the relationship between access restrictions and online safety. Third, it evaluates the potential effects of the Regulation on electronic system operators and market competition, particularly the distribution of compliance costs between global technology platforms and smaller domestic operators.

The legal materials analysed consist primarily of constitutional provisions, statutes, government regulations, ministerial regulations, official policy documents, and relevant comparative legislation. These primary legal sources are complemented by secondary materials, including academic literature, policy reports, institutional publications, legal commentaries, and recent scholarship addressing child online protection, digital governance, constitutional law, personal data protection, age assurance technologies, and platform regulation. Contemporary reports describing the implementation of PP Tunas and comparable international developments are also incorporated where relevant to contextualise the legal analysis.

Throughout the article, the analysis remains deliberately focused on the internal coherence of the regulatory framework rather than on broader policy preferences regarding children's access to social media. Accordingly, the discussion does not attempt to determine whether restricting minors' access to digital platforms is inherently desirable. Instead, it evaluates whether the legal instrument chosen by the Indonesian Government is constitutionally proportionate, administratively coherent, technically feasible, and institutionally capable of achieving its stated protective objectives. The analytical framework therefore integrates

3. Result

3.1 Legal Basis of PP Tunas

Government Regulation No. 17 of 2025 (PP Tunas) constitutes delegated legislation issued by the President to implement statutory obligations established under higher legislation. Within the Indonesian hierarchy of legislation, a Government Regulation derives its authority from Acts of Parliament and therefore cannot exceed the scope of powers delegated by statute (Government Regulation No. 17 of 2025).

The Regulation was enacted on 27 March 2025 and became operational following a transitional implementation period ending in March 2026. Its legal basis primarily derives from Law No. 1 of 2024 concerning the Second Amendment to the Electronic Information and

Transactions Law, particularly Articles 16A and 16B, which require Electronic System Operators to provide protection for children in digital environments (Law No. 1 of 2024). In addition, Law No. 27 of 2022 concerning Personal Data Protection establishes children as subjects requiring enhanced protection and requires all processing activities to comply with the principles of purpose limitation and data minimisation (Law No. 27 of 2022).

Operational implementation is further regulated through Minister of Communication and Digital Affairs Regulation No. 9 of 2026, which specifies age verification procedures, platform risk classification, parental consent mechanisms, compliance obligations, monitoring procedures, and administrative enforcement (Minister of Communication and Digital Affairs Regulation No. 9 of 2026; Tech for Good Institute, 2026). The issuance of this implementing regulation reflects Indonesia's broader movement from framework legislation toward detailed governance of digital platforms (Tech for Good Institute, 2025).

3.2 Regulatory Architecture

PP Tunas applies to Electronic System Operators providing online platforms, applications, digital services, and online games. The Regulation defines a child as every individual below eighteen years of age and introduces a regulatory framework based upon both the user's age and the platform's level of risk (Government Regulation No. 17 of 2025).

Rather than imposing a blanket prohibition, the Regulation establishes differentiated age categories. Children below thirteen years may only maintain accounts on low-risk services specifically intended for children. Users between thirteen and sixteen years, as well as those between sixteen and eighteen years, may access low-risk services with parental consent (Government Regulation No. 17 of 2025; Cahyaningsih & Sasono, 2026).

Ministerial Regulation No. 9 of 2026 additionally communicates that users below sixteen years of age are prohibited from maintaining accounts on high-risk platforms. Consequently, Electronic System Operators must classify services according to prescribed risk categories before determining account eligibility (Minister of Communication and Digital Affairs Regulation No. 9 of 2026).

Administrative enforcement is directed exclusively toward Electronic System Operators rather than children or parents. Available sanctions range from written warnings and administrative fines to temporary suspension of services or platform features and, in cases of serious or repeated violations, termination of platform access within Indonesian territory (Government Regulation No. 17 of 2025).

The Regulation further requires operators to obtain explicit parental consent for users below seventeen years of age, apply the highest privacy settings by default, prohibit commercial profiling of children, and establish reporting mechanisms for harmful online content (Government Regulation No. 17 of 2025).

Age verification primarily relies upon age-inferential technology. Instead of requiring official identity documents, operators may estimate users' ages through behavioural and contextual indicators, including patterns of interaction and content consumption. The Regulation also establishes collaborative monitoring between government authorities and Electronic System Operators for reporting online content considered harmful to children (Government Regulation No. 17 of 2025; Minister of Communication and Digital Affairs Regulation No. 9 of 2026).

3.3 Comparative Regulatory Characteristics

Comparison with neighbouring jurisdictions demonstrates that Indonesia forms part of a broader regional trend toward regulating children's access to social media platforms. Australia adopted the Online Safety Amendment (Social Media Minimum Age) Act 2024, which prohibits users below sixteen years of age from maintaining accounts on designated social media services. The Australian framework requires platforms to take reasonable steps to verify users' ages while expressly prohibiting exclusive reliance on government-issued identity

documents for age verification (Online Safety Amendment (Social Media Minimum Age) Act 2024; Cahyaningsih & Sasono, 2026).

Malaysia adopted the Online Safety Act 2025, which similarly establishes a minimum social media age of sixteen years but implements verification primarily through electronic know-your-customer procedures based on official identity documents (Online Safety Act 2025; Mayer Brown, 2025).

These regulatory frameworks illustrate three distinct approaches to age assurance. Indonesia adopts behavioural age inference, Australia applies a reasonable-steps approach using multiple verification options, whereas Malaysia relies predominantly on identity document-based electronic verification.

3.4 Impact Assessment

3.4.1 Technical and Institutional Feasibility

The findings indicate that the implementation of PP Tunas presents substantial technical and institutional challenges. Although the Regulation adopts behavioural age-inference as a less intrusive alternative to document-based verification, existing studies demonstrate that this approach relies upon continuous behavioural profiling, creating concerns regarding privacy, accuracy, and discriminatory outcomes (Shaffique & van der Hof, 2026). Industry practice likewise illustrates the limitations of artificial intelligence-based age estimation, including its vulnerability to inaccurate classification and user manipulation (Antara, 2026; Biometric Update, 2026). Furthermore, while the Regulation simultaneously promotes data minimisation and privacy-by-default, behavioural age inference inherently depends upon continuous monitoring of user activity, creating an apparent inconsistency between its verification mechanism and its data protection objectives. The absence of measurable criteria for platform risk classification further increases implementation uncertainty for regulated operators (Center for Indonesian Policy Studies, 2026).

Institutional readiness constitutes an additional challenge. The findings show that Indonesia has yet to establish the independent data protection authority mandated under the Personal Data Protection Law, leaving supervisory functions temporarily exercised by the Ministry of Communication and Digital Affairs (Lexology, 2025; Mahkamah Konstitusi Republik Indonesia, 2026). This institutional arrangement coincides with continuing concerns regarding public-sector data security following previous national data-centre incidents (Kompas, 2025). The literature further recommends the establishment of an independent supervisory institution comparable to Australia's eSafety Commissioner in order to strengthen oversight, improve accountability, and separate regulatory enforcement from supervisory functions (Tech for Good Institute, 2026). In addition, the Regulation raises broader legal questions regarding cross-border data governance and the potential interaction between its enforcement mechanisms and Indonesia's international trade commitments.

3.4.2 Impact on Minors

The findings suggest that PP Tunas is founded upon a legitimate objective of protecting children from documented online harms, including exploitation, grooming, and trafficking. However, the effectiveness of the chosen regulatory mechanism depends heavily upon active parental supervision. Consequently, children lacking stable family environments or effective parental support may receive less protection than intended. Similarly, children who depend upon digital communities for educational, psychological, or social support may experience unintended restrictions on beneficial online participation. Existing policy analyses further suggest that focusing regulatory intervention primarily on parental consent does not directly address platform design characteristics, including recommendation algorithms, engagement optimisation, and messaging architecture, that contribute significantly to online risks (Tech for Good Institute, 2026). Public responses from adolescent users likewise indicate that some perceive the Regulation as insufficiently reflecting the realities of contemporary digital participation (Kompasiana, 2026).

3.4.3 *Impact on Business and Market Structure*

The findings also demonstrate significant implications for electronic system operators. PP Tunas assigns primary responsibility for compliance to digital platforms while leaving several technical requirements insufficiently defined. This regulatory uncertainty may increase implementation costs, particularly for domestic operators with more limited technological and financial resources. Economic policy analysis has therefore suggested that compliance obligations may inadvertently strengthen the market position of large multinational platforms while reducing the competitiveness of smaller domestic providers (Institute for Development of Economics and Finance [INDEF], 2026). Industry observations similarly indicate that major global platforms had already introduced age restrictions, parental controls, and content moderation mechanisms before PP Tunas entered into force, whereas domestic developers continue to identify.

4. Discussion

4.1 *Comparative Perspective: Indonesia, Australia and Malaysia*

Indonesia's measure is best understood beside the two regional regimes that adopted comparable restrictions in the same period. Australia legislated first in form, through the Online Safety Amendment (Social Media Minimum Age) Act 2024, which bars users under sixteen from holding accounts on age-restricted platforms and took effect on 10 December 2025. The Australian model requires platforms to take reasonable steps to enforce the age limit, expressly prohibits reliance on government identity documents as the sole method, demands that reasonable alternatives and privacy safeguards be offered, and is backed by substantial penalties reaching tens of millions of Australian dollars (Cahyaningsih & Sasono, 2026). Malaysia adopted a similar minimum age of sixteen under its Online Safety Act 2025, which received royal assent in May 2025 and entered into force on 1 January 2026; enforcement of the under-sixteen account ban under its subsidiary codes began on 1 June 2026, and the Malaysian approach leans towards mandatory electronic know-your-customer verification using official identity documents (Mayer Brown, 2025).

Two comparative observations follow. The first concerns the claim, advanced on the Regulation's announcement, that Indonesia was the first non-Western jurisdiction, and the first in Southeast Asia, to adopt so broad a measure.

The second observation concerns method. The three regimes embody three different philosophies of verification: Indonesia's behavioural inference, Australia's layered reasonable-steps duty with an express bar on identity-document monoculture, and Malaysia's identity-document-based electronic verification. Each carries a characteristic risk inference its pervasiveness and inaccuracy, document verification its exclusion of those without papers and its concentration of sensitive data, layered duties their indeterminacy. The comparison does not crown a winner. It shows instead, that the matter is so new and complex that, even in the same region, no jurisdiction has reconciled the competing demands of protection, privacy and feasibility. Yet, Indonesia's graduated and risk-based design has a real claim to greater proportionality than a blanket ban, but the final evaluation will come in time.

4.2 *Balance and Concluding Observations*

Weighed in the round, PP Tunas is neither the breakthrough its proponents describe nor the failure its harshest critics allege. Its strengths are genuine. The graduated, risk-based structure is more discriminating than a single prohibition, and is in principle better suited to the reality that risk on social media derives from particular features rather than from platforms as undifferentiated wholes. The prohibition on the commercial profiling of children, the default application of the strictest privacy settings, and the direction of sanctions at platforms rather than at families or minors are defensible design choices that align the Regulation with the better international practice.

Its weaknesses are equally genuine, and they cluster around the operational and institutional layer rather than the protective aim. The verification method prescribed sits in tension with the privacy principles the same instrument proclaims; the data-custody infrastructure has a recent record that undermines confidence; the supervisory architecture lacks the independent authority that the Personal Data Protection Law itself requires; the age thresholds are stated inconsistently as between the regulatory text and its official presentation; and the compliance burden is imposed without the technical parameters that would allow it to be met evenly. Several of these gaps were anticipated by civil-society observers, who criticised the speed of the drafting process and the limited study that preceded it (Tempo, 2025). None of these is a defect of *intention*. Each is a defect of *completion* the gap between a protective command and the architecture that would make it work. The following table summarises the balance.

Table 2. Strengths and Weaknesses of PP Tunas

Strengths	Weaknesses
<ul style="list-style-type: none"> - graduated, risk-based design more proportionate than a blanket prohibition. - commercial profiling of minors prohibited; strictest privacy settings applied by default. - sanctions directed at platforms rather than at minors or parents. - regulation of toxic engagement design and provision for screen-time and digital-wellness features. - early regional positioning that may influence emerging ASEAN standards. 	<ul style="list-style-type: none"> - age-inferential verification entails pervasive behavioural observation, in tension with the - regulation’s own data-minimisation and privacy-by-default commands. - data-custody infrastructure of uncertain resilience following the 2024 national-data-centre breach. - no independent data-protection authority in place; the enforcing ministry also supervises. - age thresholds stated inconsistently between the regulatory text and official communication. - compliance imposed without measurable technical parameters, with costs falling unevenly on smaller domestic operators.

The instrument addresses a real and urgent problem with a tool that is innovative in conception but looks unfinished in execution. Its effectiveness will be measured less by the number of accounts deactivated than by whether the operational and institutional gaps identified here are closed: whether an independent supervisory authority is established, whether the verification method is reconciled with the privacy guarantees the Regulation itself proclaims, and whether the technical parameters of risk classification are specified with enough precision to permit consistent and contestable enforcement. Given Indonesia’s particular infrastructural vulnerabilities and the scale of its young and connected population, the possibility for errors is unusually large.

4.3 Open Questions and Directions for Future Research

Four main questions remain open. A first avenue for future research is constitutional. This assessment tests PP Tunas against the information freedoms of Articles 28C and 28F and the limitation clause of Article 28J, but the deeper question it opens is also doctrinal: what standard of review should the Constitutional Court develop for administrative measures that restrict digital rights in the name of child protection? Indonesia lacks settled proportionality jurisprudence for executive-issued restrictions of this kind, and PP Tunas offers a concrete vehicle through which such a standard could be elaborated.

The second is one of standing. Where the Government sanctions a platform and the platform responds by cutting off lawful users like an influencer who earns a living on the service, a small trader who sells through it those users suffer a concrete loss but have no obvious defendant. Do they sue the platform, which merely executed the restriction, or the State, which imposed it? Who will pay the damages? PP Tunas does not say, and the point is not academic: it determines whether a class action by affected citizens is even possible, and against whom.

The third concerns how behavioural age-inference operates over time. For what we understand by the public information and the provisional regulations, all the users based in Indonesia will be constantly scrutinized. Does the monitoring stop once a certain number of users has been authorised - and so will be restricted only to the new ones - or does it run continuously for all? What happens when a minor reaches the next age band - must the account be “rebuilt” or ask a second parental authorization? And how is an account that represents no natural person at all treated by a system that infers a human age: they will receive a special permission to exist? There will be special accounts for working or married minors? The Regulation authorises the method without answering any of these, leaving its everyday operation to be settled - or not - in practice.

Finally, as last doubt, we can question the relationship between PP Tunas and Indonesia’s external commitments, including the problem whether enforcement actions against foreign platforms could intersect with obligations under trade arrangements — a matter that merits dedicated analysis beyond the scope of this assessment. Each of these is a candidate for the empirical and doctrinal work that the Regulation’s implementation will, in time, make possible.

5. Conclusion

This study examined Indonesia's Government Regulation No. 17 of 2025 (PP Tunas) through a doctrinal legal analysis combined with a comparative assessment of Australia and Malaysia. The findings demonstrate that PP Tunas represents one of Indonesia's most comprehensive regulatory initiatives for protecting children in digital environments by introducing a risk-based framework that combines age classification, platform responsibility, parental involvement, and enhanced privacy obligations.

The analysis also shows that the Regulation's principal challenges lie not in its protective objective but in its operational implementation. Several legal and institutional issues remain unresolved, including inconsistencies in age thresholds, the reliance on behavioural age-inference technologies that may conflict with personal data protection principles, the absence of measurable technical standards for platform risk classification, and the lack of an independent personal data protection authority responsible for supervising data processing. These institutional and technical gaps may reduce legal certainty for both platform operators and users while limiting the effectiveness of the regulatory framework.

From a comparative perspective, Indonesia adopts a distinct regulatory approach compared with Australia and Malaysia by relying primarily on behavioural age assurance rather than document-based identity verification or broad reasonable-step obligations. Although this graduated and risk-based model has the potential to provide a more proportionate balance between child protection and digital access, its long-term effectiveness will depend upon transparent implementation standards, robust institutional oversight, and safeguards capable of reconciling child protection with constitutional rights and personal data protection.

This study contributes to the emerging scholarship on digital platform governance by demonstrating that effective child online safety regulation requires not only protective legal mandates but also coherent institutional design, technological accountability, and regulatory certainty. Future policy development should therefore prioritize the establishment of an independent supervisory authority, the clarification of measurable compliance standards, and the adoption of privacy-preserving age verification mechanisms that strengthen both public trust and regulatory effectiveness.

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