



**SOCIAL
MEDIA**

ADVISORY
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No More Social Media for You – Child Protection Measures Introduced by the Ministry of Communication and Digital Affairs

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On 6 March 2026, the Ministry of Communication and Digital Affairs (“**MOCD**”) issued MOCD Regulation No. 9 of 2026 on the Implementing Regulation of the Government Regulation No. 17 of 2025 on Governance of Electronic System Operation in Child Protection (“**MOCD Reg. 9/2026**”). This regulation establishes a framework for Electronic System Operators (*Penyelenggara Sistem Elektronik*) to fulfil their obligations to protect children as users of electronic systems.

MOCD Reg. 9/2026 introduces several notable provisions that significantly affect the operation of electronic systems for both users and operators. This article highlights the main measures, particularly those relating to children’s use of social media and the procedure for filing objections to administrative sanctions.

A. Restrictions on Children’s Access to Social Networking and Social Media Services

The rapid development of the digital era has led to widespread social media use, including among children under 16. Social media is no longer used solely for personal or recreational purposes but is also commonly integrated into school-related learning. However, under MOCD Reg. 9/2026, access to social media by children under 16 is now restricted.

The regulation classifies social networking and social media services as Products, Services, and Features with a high-risk profile. These services are classified as high-risk because they enable online social interaction between two or more users, allow users to connect with a broad user base, and permit users to upload and share content.

In line with these classifications and the applicable age restrictions, Electronic System Operators are required to deactivate accounts belonging to children. According to the MOCD’s official website, the first phase of account deactivation began on 28 March 2026 and targets high-risk social media platforms, including YouTube, TikTok, Facebook, Threads, Instagram, X, Bigo Live, and Roblox.

B. Procedures for Filing Objections to Administrative Sanctions by Electronic

Electronic System Operators that fail to meet their child protection obligations may be subject to administrative sanctions in the form of:

- (i) written warnings
- (ii) administrative fines
- (iii) temporary suspension of business operations; and/or
- (iv) access termination.

Operators may file an objection (*Keberatan*) against any imposed sanction. The objection must be submitted in writing to the Directorate General of the Digital Ecosystem or to the Minister within 21 days from either:

- (i) the date the operator receives the sanction decision; or
- (ii) the date the decision is published on the Ministry’s official website.

The Directorate General or the Minister must decide the objection within 20 days of receipt, either by upholding or rejecting it. If the objection is upheld, a revised decision will be issued in accordance with the request. If no decision is issued within this period, the objection is deemed automatically upheld.

The formal decision must be issued no later than five days after the end of the 20-day review period and delivered to the operator within seven days of issuance, either by email or to its registered address. If the operator remains dissatisfied, it may file a claim with the State Administrative Court to assess whether the decision or action involves an abuse of authority.

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