Desk Review

Social Media Age Restriction Laws:
What Australia and the UK Have Done
and What It Means for Nigeria

1. Introduction

Children around the world are spending more time online than ever before. While the internet offers enormous opportunities for learning, creativity, and connection, it also exposes young people especially children to serious risks including cyberbullying, exploitation, exposure to harmful content and online grooming.

Governments across the world are responding to these risks by introducing laws that restrict or regulate children's access to social media. Two of the most closely watched examples are Australia and the United Kingdom, both of which have recently passed legislation setting a minimum age for social media access.

Nigeria is currently at a critical decision point. The Child Online Access Protection Bill (HB 244), which passed the House of Representatives in December 2025, is currently awaiting Senate consideration. Nigeria's Federal Ministry of Communications, Innovation and Digital Economy also opened a public consultation in March 2026 on restricting social media access for children under 16.

This review examines what Australia and the UK have done, how effective their approaches have been, and what Nigeria can realistically learn and adapt from their experiences.

2. Australia: The Strictest Law, The Hardest Test

2.1 What the Law Says

Australia became the first country in the world to legislate a hard minimum age of 16 for social media access, with the Online Safety Amendment (social media Minimum Age) Act taking effect in December 2025. The law applies to major platforms including Instagram, TikTok, Snapchat, Facebook, and X (formerly Twitter). It does not apply to messaging apps like WhatsApp, or to platforms considered primarily educational.

Minimum Age	16 years
Effective Date	December 2025
Platforms Covered	Instagram, TikTok, Facebook, Snapchat, X
Penalty for Platforms	Fines of up to AUD 50 million for systemic non-compliance

2.2 What Has Happened Since

The initial results appeared promising. Age-restricted platforms removed access to approximately 4.7 million under-16 accounts across Australia by mid-December 2025. Three in five Australians reported believing the ban was effective, and many parents said they noticed positive changes in their children's behaviour.

However, independent research tells a more complicated story. A University of Newcastle study found that more than 85% of teenagers under 16 continued using restricted platforms despite encountering age checks. Of those, between 54% and 68% simply continued using accounts they already had before the ban took effect. Social media use remained flat among 12- to 13-year-olds, dropped slightly among 14- to 15-year-olds, and actually grew among older teenagers.

The most significant weakness identified was the age verification method: most platforms relied on self-declaration, meaning a child was simply asked to enter their date of birth. This method is easy to bypass, and even Australian authorities have criticized it as insufficient.

2.3 Key Gaps

- Verification relied on self-declared age, which children easily falsified.

- No biometric or identity-linked verification system was mandated.
- The law focused on removing access but did not clearly invest in alternatives for children.
- Enforcement falls on platforms, but the mechanisms to hold platforms accountable are still being developed.

Australia's experience confirms a lesson that is important for Nigeria: passing the law is the easier step. Making it work is an entirely different challenge.

3. United Kingdom: Building the Machine Before the Ban

3.1 What the Law Says

The United Kingdom took a different approach from Australia. Rather than starting with an outright ban, the UK built regulatory infrastructure first. The Online Safety Act 2023 required social media platforms to conduct risk assessments, introduce age assurance measures, apply safer default settings for younger users, and moderate harmful content actively.

Only in April 2026 did the UK move toward an actual minimum age restriction, with the Children's Wellbeing and Schools Act 2026 receiving Royal Assent on 29 April 2026. Under this new law, the government is required to introduce under-16 social media restrictions within 12 months, following broadly the same model as Australia.

Minimum Age	Under 16 (ban incoming — regulations due by April 2027)
Regulatory Body	Ofcom (Office of Communications)
Platform Fines	Up to £18 million or 10% of global annual revenue
Criminal Liability	Executives face up to 2 years in prison for ignoring enforcement notices
Investment in Alternatives	£500M in youth enrichment, £3B+ in youth centres and sport facilities

3.2 What Has Happened Since

The UK's approach is widely regarded as more systematic than Australia's because it built the enforcement machinery first. Ofcom launched investigations into more than 90 online services and issued six fines for non-compliance, including £800,000 against one gaming platform and £1 million against an adult content site.

However, even the UK's more robust system has faced enforcement challenges. VPN usage surged by between 1,000% and 1,800% among internet users in the period around enforcement dates. Organizations working with children reported increased VPN use specifically among under-16s in the months following enforcement, meaning the children the law was designed to protect were actively finding ways around it.

3.3 What the UK Is Doing Differently

One of the most significant differences between the UK approach and Australia's is the investment in what children do instead of social media. The UK government committed substantial public funding to offline enrichment activities, recognizing that children who are banned from social media need safe and engaging alternatives.

- £500 million allocated to enrichment activities including sport and the arts.
- £132.5 million directed to schools for extracurricular programmes.
- Over £3 billion committed to youth centres and grassroots sport infrastructure.

The UK model demonstrates that a restriction without an alternative is incomplete. Children need to have somewhere meaningful to go when online spaces are restricted.

4. Comparing Australia and the United Kingdom

Area	Australia	United Kingdom
Minimum Age	16 years	Under 16 (regulations due 2027)
Approach	Immediate ban on access	Regulation first, then ban
Enforcement Body	eSafety Commissioner	Ofcom
Platform Penalties	AUD 50M for systemic failure	£18M or 10% global revenue
Age Verification Method	Mainly self-declaration	Age assurance required by law
Investment in Alternatives	Limited	£500M+ in offline activities
Main Challenge	Easy to bypass; VPN use	VPN use; still being enforced
Effectiveness So Far	Partial — 85% still accessed platforms	Infrastructure stronger; ban not yet active

5. What This Means for Nigeria

5.1 Where Nigeria Currently Stands

Nigeria's Child Online Access Protection Bill (HB 244) passed the House of Representatives in December 2025 and is currently awaiting Senate consideration. The statistics driving the urgency of this bill are sobering: nine in ten Nigerian children face at least one form of cyber risk, and 80% of harmful content involving minors stays online for more than 48 hours before being removed.

Unlike a simple access ban, Nigeria's bill includes several important components. It proposes an E-Commissioner, a dedicated department within the Ministry of Communications, Innovation and Digital Economy to act as a watchdog for child safety online. It also mandates Internet Service Providers to block access to violent or illegal content, requires removal of intimate images and videos, and includes digital literacy provisions for children, parents, and educators.

Funding for the E-Commissioner's office is proposed through a child online protection tax. While the intent is clear, the reliability of this funding source will be critical to whether the law works in practice.

5.2 The Enforcement Problem

Nigeria's biggest challenge in implementing any social media age restriction is not the law itself but it is verification. Both Australia and the UK have struggled because their systems rely on users telling the truth about their age. Nigeria would face the same problem, with the added complication that VPNs are already widely used across the country and are freely available and with the fact that Nigeria's dearth of data has always been a problem across all systems and sectors in Nigeria.

5.3 The Investment Question

The UK's experience highlights something Nigeria's bill does not yet clearly address: children who are restricted from social media need safe, engaging alternatives. The UK committed billions of pounds to youth programmes, sports facilities, and school enrichment activities alongside its legislation.

Nigeria's child protection budget environment is very different. But the principle still applies. Any restriction policy that does not invest in what children do instead of social media risks creating a policy gap pushing children toward less visible and potentially more dangerous online spaces, or simply leaving them with nothing

6. Recommendations for Nigeria

Based on the experiences of Australia and the United Kingdom, and Nigeria's existing infrastructure and legislative context, the following recommendations are offered:

6.1 Explore a Dedicated Child-Safe Browser

Rather than relying solely on individual platforms to enforce age limits, Nigeria should consider mandating or incentivizing a certified child-safe browser mode for devices used by children under 16. This means the restriction is built into the gateway the browser itself rather than depending on each app to do the right thing. ISPs and device manufacturers could be required to offer this as a default option, with age-verified accounts needed to unlock full internet access. This shifts the burden away from children being honest and toward the infrastructure being protective.

6.2 Address Incoming Content, Not Just What Children See

Most age restriction policies focus on what children can access. But social media works in both directions. A content filter controls what the algorithm pushes to a child's feed, it does nothing to stop an adult from deliberately sending a harmful message, inappropriate content, or grooming communication directly to a child's inbox. Nigeria's legislation should go further by requiring platforms to set all verified underage accounts to private by default, restrict direct messages from unconnected adults, and implement AI-powered screening of incoming messages for grooming language or explicit content. Protecting children online is not only about what they search for, it is also about who can reach them.

6.3 Establish and Resource the E-Commissioner's Office

The proposed E-Commissioner must be adequately resourced and given genuine enforcement powers including the ability to fine platforms and require content removal with clear timelines. Without a functioning enforcement body, the law will remain symbolic.

6.4 Pair Restriction with Investment in Alternatives

Nigeria should develop a complementary strategy that invests in offline enrichment and safe online alternatives for children and young people, recognizing that restriction without alternatives risks pushing children toward less regulated digital spaces.

6.5 Integrate Digital Literacy into Schools and Communities

Digital literacy provisions in Nigeria's bill are a strength that should be developed fully. Children, parents, teachers, and community leaders all need practical education on online safety, recognizing risks, and responsible digital behaviour.

7. Conclusion

The global movement to protect children from the harms of unregulated social media access is real and growing. Australia and the United Kingdom have shown both the importance of acting and the difficulty of doing so effectively. The lesson is not that the law is unnecessary, it is that the law alone is never enough.

Nigeria has an opportunity to learn from both countries' experiences before finalizing its own approach. With an existing identity infrastructure in the NIN, a bill that includes more than just an age restriction, and a child protection community that is actively engaged in this conversation, there is genuine potential for Nigeria to build a more thoughtful and effective model.

What is required is political will, adequate funding, community investment, and an honest acknowledgement that protecting children online is not a one-time legislative act, it is an ongoing commitment.