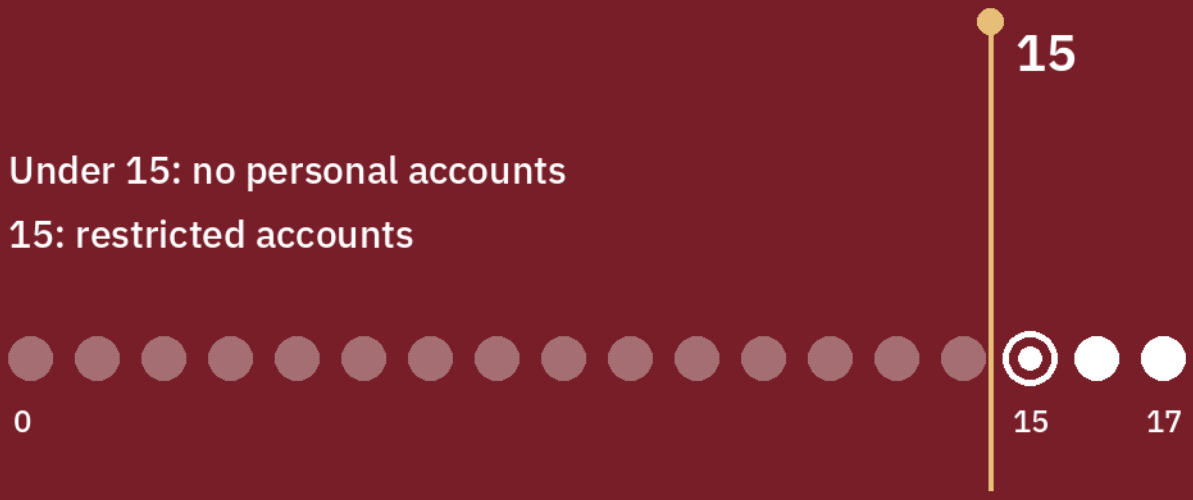
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Age Limits Online

The UAE's Child Digital Safety Framework: the 2025 Decree-Law and the Under-15 Rule

EPIC Research Team

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Age Limits Online: The UAE's Child Digital Safety Framework

The 2025 Decree-Law, the Under-15 Social Media Rule and the Compliance Window to 2027

EPIC – Emirati Perspectives and Insight Centre

EPIC-PP-2026-044 · AI Governance · 17 November 2026 · EPIC Research Team

Abstract

The UAE now has a dedicated legal framework for children's safety online. Federal Decree-Law No. 26 of 2025 on Child Digital Safety was issued on 1 October 2025 and took effect on 1 January 2026 (UAE Legislation 2025). It applies to digital platforms and internet service providers operating in the UAE or directed at users in the country, sets up a Child Digital Safety Council chaired by the Minister of Family, and provides for a national system that classifies platforms by the risk they pose to children (WAM 2025). Platforms already operating had one year to comply, so the Decree-Law becomes fully enforceable in January 2027 (UAE Legislation 2025, art. 18; Baker McKenzie 2026).

Cabinet Resolution No. 106 of 2026 then set the first concrete age rule. From 30 June 2026 children under 15 may not create, use or operate personal social media accounts, and accounts held by 15-year-olds must carry extra restrictions (UAE Legislation 2026, art. 3). Parental consent is not an exception, self-declared age is not accepted as verification, and platforms have 12 months from entry into force to comply (UAE Legislation 2026, arts. 3, 4 and 8).

This paper sets out what the two instruments require, how far implementation had gone by 17 November 2026, what survey evidence says about children's use of social media in the UAE, and how the UAE rule compares with Australia's under-16 minimum age, the nearest working precedent. It finds that the legal design is clear on age limits and verification but that the platform classification system, the list of administrative penalties and any public compliance data were not yet published on the federal government portal at the time of writing.

Keywords: UAE; child digital safety; Federal Decree-Law No. 26 of 2025; Cabinet Resolution No. 106 of 2026; social media minimum age; age verification; TDRA; National Media Authority; Child Digital Safety Council; online safety; children's data

1. Scope, sources and method

The paper covers the period from the issue of the Decree-Law in October 2025 to 17 November 2026. It relies on four kinds of source. The first is the text of the instruments themselves as published on the UAE Legislation platform, which carries an English translation and states that the Arabic text prevails in case of conflict (UAE Legislation 2026). The second is official statements from the Emirates News Agency (WAM) and the federal government portal. The third is analysis by two international law firms, used for interpretation and for points the instruments leave open. The fourth is survey and enforcement data: a 2024 survey of UAE children and parents and Australian government and company statements on that country's minimum age law.

The English text of the Decree-Law was first unavailable to this paper: the platform's download file returned an HTTP 403 response to automated requests. A rendered copy of the record page, retrieved on 17 November 2026, carries the full English translation of all 20 articles, and the provisions below were checked against it (UAE Legislation 2025). As with the resolution, the platform states that the Arabic text prevails in case of conflict. The Cabinet Resolution's English text was also read in full.

Dates of future deadlines that are not stated as calendar dates in the instruments are EPIC calculations and are labelled as such.

2. The 2025 Decree-Law

2.1 Scope

WAM announced the Decree-Law on 26 December 2025. It applies to internet service providers and to digital platforms "whether operating within the UAE or targeting users within the UAE", a list that includes websites, search engines, smart applications, messaging applications, forums, online gaming platforms, social media, live streaming, podcasts, streaming and video-on-demand services and e-commerce platforms (WAM 2025). It also applies to those responsible for the care of children and defines their duties (WAM 2025). Baker McKenzie notes that only two internet service providers are licensed under the UAE telecommunications law, du and e& (Baker McKenzie 2026).

The record on the UAE Legislation platform gives an issue date of 1 October 2025, publication in Official Gazette No. 809 (supplement 1) on 14 October 2025 and an effective date of 1 January 2026 (UAE Legislation 2025). The text has 20 articles (UAE Legislation 2025).

2.2 Main obligations

The Decree-Law sets the framework and leaves much of the detail to later instruments. Its main elements are these.

A risk-based classification system. All platforms operating in or directed at the UAE are to be classified "based on an assessment of their risks and impact on children", by type, content, usage volume and impact, with controls and restrictions for different age groups (WAM 2025; UAE Legislation 2025, art. 6). The federal portal says the classification will define the appropriate age groups for each platform, the age verification mechanisms required and the obligations that follow from each class (UAE Government Portal 2026).

Children's data. Platforms may not collect or use the personal data of children under 13 unless a parent or guardian gives clear consent that can easily be withdrawn, the purpose is explained, and the data is not used for targeted advertising or commercial purposes (UAE Legislation 2025, art. 7(1); UAE Government Portal 2026). Platforms used for educational or health purposes can be exempted from this prohibition by Cabinet resolution (UAE Legislation 2025, art. 7(3)).

Gambling. Children may not be given access to online commercial games or betting, and both platforms and internet service providers must take technical and administrative measures to enforce this (UAE Legislation 2025, art. 9).

Platform tools. The portal lists the tools platforms must provide: privacy settings on by default, parental controls, age-based content ratings, daily usage limits and rest periods, simple reporting of harmful content, use of artificial intelligence to detect and remove harmful content, and immediate

reporting of child sexual abuse material (UAE Government Portal 2026; UAE Legislation 2025, art. 10(1)).

Caregivers. Parents and guardians must supervise children's digital activity, use parental controls, avoid creating accounts for children on platforms that are not suitable for their age and avoid exposing children online in ways that threaten their privacy or dignity, which Clyde & Co calls "sharenting" (UAE Legislation 2025, art. 13; Clyde & Co 2026). Baker McKenzie observes that "it remains to be seen how such obligations will be enforced in practice" (Baker McKenzie 2026).

2.3 Institutions and enforcement

The Decree-Law creates the Child Digital Safety Council, chaired by the Minister of Family, as "an advisory and coordinating body" across federal and local government and the private sector (WAM 2025; UAE Legislation 2025, arts 4 and 5). The Telecommunications and Digital Government Regulatory Authority (TDRA) issues policies and standards and supervises internet service providers, while other competent authorities monitor platform obligations in their own areas (UAE Legislation 2025, arts 10 and 11). The Cabinet is to issue a regulation listing administrative penalties (art. 16), and authorities may order closure or partial or total blocking where a violation is established (art. 10(3)).

Entities already subject to the law on its issue must regularise their status within one year of its entry into force, a period the Cabinet may extend (UAE Legislation 2025, art. 18). Digital Policy Alert's record places the end of that period on 1 January 2027 (Digital Policy Alert 2026). Both law firms give January 2027 as the date of full enforceability (Clyde & Co 2026; Baker McKenzie 2026).

3. Cabinet Resolution No. 106 of 2026

3.1 The age rule

The Cabinet issued Resolution No. 106 of 2026 on 17 June 2026. It was published in Official Gazette No. 826 on 29 June 2026 and took effect on 30 June 2026, the day after publication (UAE Legislation 2026, art. 9). WAM reported it on 18 June 2026 (WAM 2026c).

The resolution covers any platform that lets users create public or semi-public accounts, supports social interaction or the publication of content, or relies on algorithmic systems to display, rank or recommend content, whether free or paid and wherever the provider is based (UAE Legislation 2026, art. 1). It applies to all such platforms whose services are available in the UAE or directed at users there (art. 2).

Article 3 sets three bands:

- Under 15: children may not create, use or operate personal accounts. Platforms must not allow account creation and must not give these children access to "the full features" of a platform, including posting, commenting, sharing, joining public groups or open channels, or large-scale interactive spaces (art. 3(1) and 3(2)).
- Aged 15 but under 16: access is allowed, but accounts must carry restrictions. These include content classification and filtering, limits on public sharing and on contact with users unknown to the child and the caregiver, tools to set permitted hours and daily or night-time limits, parental controls, and the restriction or disabling of high-risk features such as "unrestricted private

messaging, open live streaming, intensive algorithmic recommendation systems" (art. 3(3) and 3(4)).

- Aged 16 and over: the resolution imposes no band-specific restrictions, though the Decree-Law's general duties towards children under 18 continue to apply.

Article 3(5) states that the consent of a caregiver "or any other person shall not be recognized as an exception". Caregivers may adjust the settings of 15-year-olds' accounts through parental controls only within the limits the resolution sets.

3.2 Age verification

Article 4 is the most technically demanding part. Verification must achieve "a high level of accuracy", collect only the data needed, avoid retaining biometric data or identity documents longer than necessary, avoid unjustified discrimination or technical exclusion, be able to integrate with approved national verification systems, and be open to review and audit by TDRA (art. 4(1)). Permitted methods are a digital government identity or a scanned official document with biometric matching, artificial intelligence age estimation including biometric means, approved and licensed verification providers in the UAE, or other mechanisms approved by the Council (art. 4(2)). Self-declaration "shall not be recognized" (art. 4(3)).

At the Council's media briefing on 1 July 2026, TDRA officials named UAE PASS, official identity documents, AI-powered age estimation and state-approved providers as the mechanisms in view. They said the government's role "is confined exclusively to regulation and oversight of platforms' compliance", without monitoring personal accounts or tracking individuals' activity (WAM 2026d).

3.3 Other platform and caregiver duties

Platforms must detect and suspend or disable accounts opened by children under 15, prevent circumvention, and refrain from targeting children with advertising based on tracking and behavioural profiling (UAE Legislation 2026, art. 5). Contextual advertising that does not rely on profiling is permitted. Platforms must also build awareness tools into their interfaces, carry out periodic risk assessments and report regularly to the authorities (art. 5).

Caregivers must not enable a child to hold an account in breach of the resolution, must not circumvent verification or give false information, must supervise the child's digital activity and must raise the child's awareness of risks (art. 6).

3.4 Oversight and the transition

Oversight is split. The National Media Authority supervises obligations relating to content, and TDRA supervises technical obligations (art. 7(1) and 7(2)). Either may issue warnings, order closure or partial or total blocking, or impose penalties drawn from the list of administrative penalties to be issued under the Decree-Law (art. 7). Both report periodically to the Council (art. 7(3)).

Platforms have a transitional period of 12 months from the resolution's entry into force (art. 8(1)). On EPIC's calculation from the 30 June 2026 effective date, the period runs to about 30 June 2027. Figure 1 places this alongside the other dates.

Figure 1. UAE child digital safety instruments and deadlines, 2016 to 2027



Earlier laws are shown by year only. Open grey markers are compliance deadlines; the Resolution 106 end date is an EPIC calculation (12 months from entry into force).
Sources: UAE Government Portal 2026; UAE Legislation 2025; UAE Legislation 2026; WAM 2026a; WAM 2026b; Digital Policy Alert 2026; Baker McKenzie 2026.

Figure 1. UAE child digital safety instruments and deadlines, 2016 to 2027

4. Implementation to November 2026

The Council held its first meeting on 12 February 2026. It adopted a governance framework, agreed to develop a national classification system for platforms and identified social media as the "first priority track" (WAM 2026a). In February 2026 the Education, Human Development and Community Development Council discussed regulating children's social media use at its second meeting of the year. The Minister of Family told it that the first phase would focus on social media and "age-based access management" before other services were covered according to risk (Economy Middle East 2026).

On 30 April 2026 the Council held a workshop on the risk-based classification system, reviewing criteria based on content, communication and commercial practices and proposed obligations such as safer default settings and limits on high-risk features (WAM 2026b). The Cabinet resolution followed in June, and the Council presented it to media on 1 July 2026 (WAM 2026d). At that briefing the Minister described the national framework for protecting children and families as comprising "more than 50 legislative and regulatory instruments" (WAM 2026d). The National Media Authority said it would introduce national standards for children's media content and a framework for the age classification of media content (WAM 2026d).

Three elements were still missing from the public record on 17 November 2026. The federal portal's list of the legal framework for children's digital safety names the Decree-Law, Resolution No. 106 of 2026, the Child Rights Law of 2016, the Cybercrimes Decree-Law of 2021 and the Media Regulation Decree-Law of 2023 (UAE Government Portal 2026). It does not list a decision issuing the platform classification system or the list of administrative penalties to which Article 7 of the resolution refers.

EPIC found no official publication of either. Nor has any authority published figures on accounts verified, restricted or removed. This is not evidence that the instruments do not exist in draft, only that they were not public.

5. What the evidence says about children's use

There is little recent public data on how children in the UAE use social media. The most detailed available source is a survey of 1,000 parent and child pairs, with children aged 3 to 17, conducted online by Toluna for Kaspersky and the UAE Cyber Security Council and released in October 2024 (Kaspersky 2024). Its main findings are shown in Figure 2.

Figure 2. Selected findings on children's digital use in the UAE, 2024 survey (per cent)

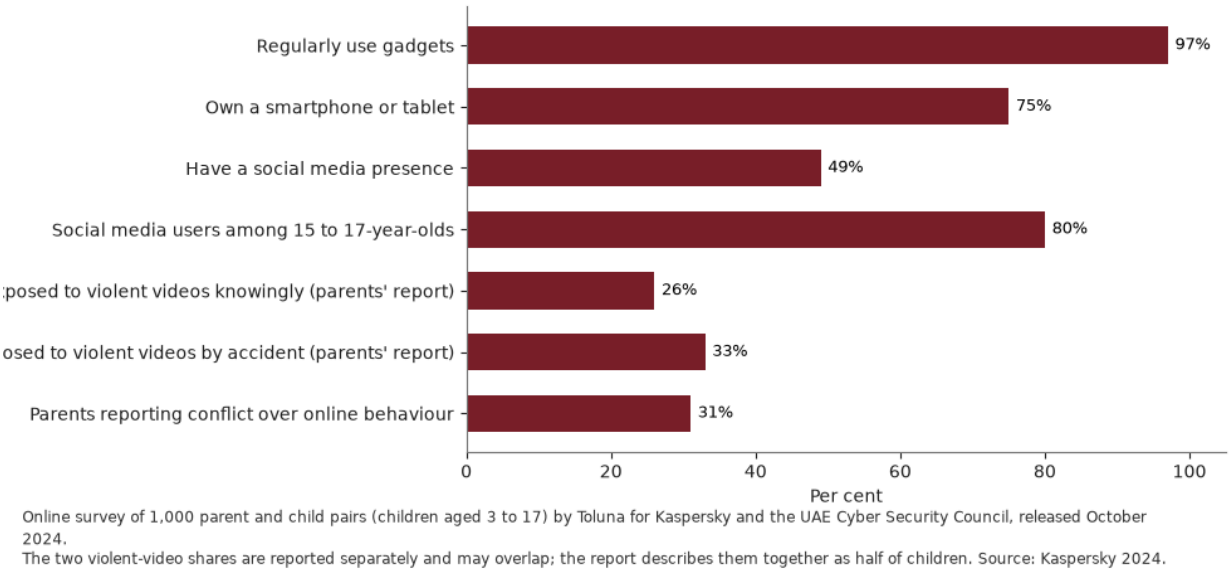


Figure 2. Selected findings on children's digital use in the UAE, 2024 survey (per cent)

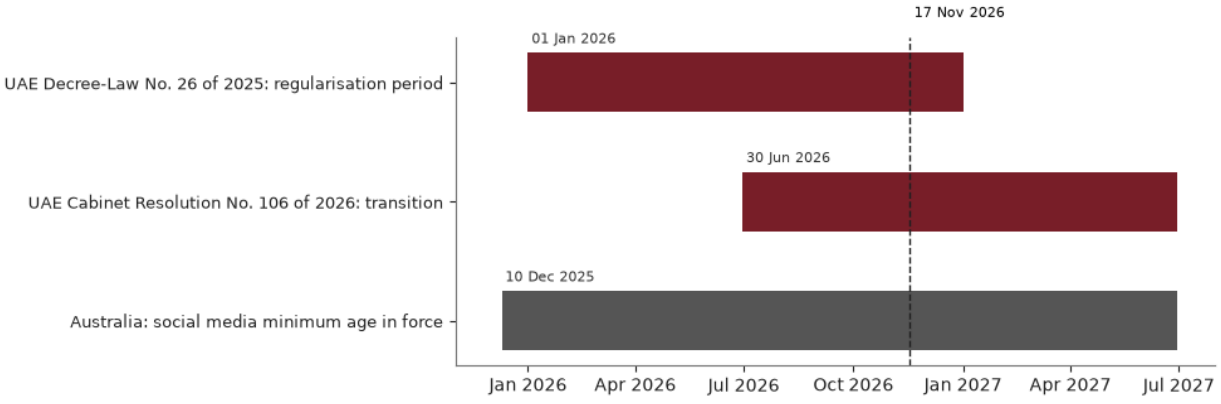
According to the survey, 97% of children regularly use gadgets and 75% have their own smartphone or tablet. Just under half (49%) have a social media presence, and the share rises with age to 80% among 15 to 17-year-olds (Kaspersky 2024). Parents reported that half of children had been exposed to violent videos online, 26% knowingly and 33% by accident (the report gives the two shares separately and does not explain why they sum to more than half), and 31% of parents said they had conflicts with their children over online behaviour, most often about time spent on devices (Kaspersky 2024).

These figures need care. The survey was online, commissioned by a security company and a government council, and predates both instruments. The social media figure for the under-15 groups is not given in the report's text, so the survey cannot show how many children the new rule will directly affect. Its findings are nonetheless consistent with the reasons given in official statements, which cite exposure to inappropriate content, unsafe contact, data collection and excessive use (WAM 2026c), and with the Ministry of Health and Prevention's reference at the July briefing to sleep disorders, anxiety, social isolation and reduced concentration (WAM 2026d). One further risk, the online radicalisation of minors, is examined in EPIC paper 047 (online-radicalisation-of-minors) using European and British evidence; it is not repeated here.

6. Comparison with Australia

Australia is the nearest precedent for a national minimum age that is in force. Its law took effect on 10 December 2025 and sets the minimum age at 16 (Prime Minister of Australia 2026). Within days, according to preliminary eSafety Commissioner data released by the government on 16 January 2026, more than 4.7 million accounts held by under-16s had been deactivated, removed or restricted (Prime Minister of Australia 2026). Meta reported that by 30 June 2026 it had removed access to more than 750,000 Facebook and Instagram accounts in Australia that it assessed as belonging to under-16s, using methods including AI analysis of profile content (Meta 2026).

Figure 3. Compliance windows: UAE instruments and Australia's minimum age law



UAE bars show the period platforms have to comply. The Resolution 106 end date is an EPIC calculation. The Australian bar shows the law in force from 10 December 2025.
Sources: UAE Legislation 2025; UAE Legislation 2026; Baker McKenzie 2026; Prime Minister of Australia 2026.

Figure 3. Compliance windows: UAE instruments and Australia's minimum age law

Three differences stand out. The UAE threshold is lower, at 15, but the UAE adds a separate restricted band for 15-year-olds. The UAE resolution is more prescriptive on verification: it lists the acceptable methods and rules out self-declaration in the text of the instrument (UAE Legislation 2026, art. 4). And the UAE has given platforms a longer formal transition, 12 months for the resolution, whereas Australia's figures show platforms acting from the first days (Prime Minister of Australia 2026). Figure 3 sets out the timing.

The Australian case also shows the value of published numbers. The 4.7 million figure gave a public measure of early compliance within six weeks, even though ministers said the eSafety Commissioner was still assessing what it showed about individual platforms (Prime Minister of Australia 2026). The UAE resolution requires platforms to report periodically to the authorities and the regulators to report to the Council (UAE Legislation 2026, arts. 5 and 7), but it does not require publication.

7. Design questions

Verification and privacy. The resolution asks for high accuracy and data minimisation at the same time. Identity-based methods are accurate but involve official documents; estimation methods collect less identity data but may be less accurate near the age threshold. Article 4 tries to resolve this by limiting retention and requiring audit (UAE Legislation 2026, art. 4(1)). How TDRA audits verification in practice will decide whether both aims are met.

Circumvention. The resolution requires platforms to prevent circumvention and bars caregivers from helping children around the rules (arts. 5 and 6). Enforcement against caregivers is the least developed part of the framework. Neither instrument, as summarised in official sources, sets out how a caregiver breach would be identified or what penalty would follow.

Two regulators. Splitting content oversight (National Media Authority) from technical oversight (TDRA) follows existing mandates. It means a single platform may answer to both on related issues. The Council's coordinating role and the regulators' duty to report to it (art. 7(3)) are the mechanisms meant to keep the approach consistent.

Classification still to come. The Decree-Law's central idea is that obligations should follow risk. Until the classification system is issued, the resolution's social media rules are the only age-specific obligations in force, and services such as gaming, messaging and streaming are covered only by the Decree-Law's general duties.

8. Policy implications

Publish the remaining instruments well before the deadlines. Platforms face full enforceability of the Decree-Law in January 2027 and the end of the resolution's transition around June 2027 (Figure 3). The classification system and the penalties list determine what compliance means for most services. Publishing them early would give platforms and families time to adjust.

Publish compliance data. A short periodic statement of accounts verified, restricted and removed, by platform, would let the public judge whether the rule works, as Australia's early figures did. It would also support the continuous monitoring of the decision's implementation and impact that the National Media Authority has promised (WAM 2026d).

Build a baseline now. The best public survey predates the rules and does not report social media use by single year of age. A repeat survey, ideally with a published method and age breakdown, would allow a before-and-after comparison.

Explain the caregiver duties. Families need practical guidance on what the law expects of them, especially for 15-year-olds, whose accounts caregivers may adjust only within the resolution's limits. The Council has said it will develop tools and guidance for parents (WAM 2026d).

Related EPIC work on the UAE's digital governance includes papers on cybersecurity governance (EPIC-PP-2026-026), data sovereignty (EPIC-PP-2026-009) and the national AI strategy (EPIC-PP-2026-028). They are not repeated here.

9. Limitations

The Decree-Law was read in a rendered copy of its record page after the download file was refused; the law firms are used for interpretation only. The Cabinet resolution was read in an official English translation; the Arabic text prevails. The survey evidence is from 2024, was collected online and was commissioned rather than independent. Australian figures come from government and company statements and are preliminary. No UAE compliance data was public at the time of writing, so this paper describes the design of the rules, not their effect. Links were checked on 17 November 2026.

References

Baker McKenzie. 2026. "United Arab Emirates Issues New Child Digital Safety Law." 8 January 2026. https://www.bakermckenzie.com/en/insight/publications/2026/01/uae-issues-new-child-digital-safety-law (accessed 17 November 2026).

Clyde & Co. 2026. "UAE Issues Landmark Child Digital Safety Law: Federal Decree-Law No. 26 of 2025." 26 January 2026. https://www.clydeco.com/en/insights/2026/01/uae-issues-landmark-child-digital-safety-law (accessed 17 November 2026).

Digital Policy Alert. 2026. "Design Requirement in Federal Decree by Law Regarding Child Digital Safety (No. 26/2025)." Record of events to 1 January 2027. https://digitalpolicyalert.org/change/21349-design-requirement-in-federal-decree-by-law-regarding-child-digital-safety-no-262025 (accessed 17 November 2026).

Economy Middle East. 2026. "UAE Considers Age-Based Social Media Regulations for Children." 16 February 2026. https://economymiddleeast.com/news/uae-considers-age-based-social-media-regulations-children/ (accessed 17 November 2026).

Kaspersky. 2024. Growing Up Online: UAE Kids Report. Survey conducted by Toluna for Kaspersky and the UAE Cyber Security Council, released October 2024. https://media.kasperskydaily.com/wp-content/uploads/sites/37/2024/11/04125002/Kaspersky-UAE-Kids-Report_English.pdf (accessed 17 November 2026).

Meta. 2026. "Meta's Compliance with Australia's Social Media Ban." 12 August 2026, updated 9 November 2026. https://about.fb.com/news/2026/08/metas-compliance-with-australias-social-media-ban/ (accessed 17 November 2026).

Prime Minister of Australia. 2026. "4.7 Million Accounts Deactivated, Removed or Restricted." Media release, 16 January 2026. https://www.pm.gov.au/media/4-7-million-accounts-deactivated-removed-or-restricted (accessed 17 November 2026).

UAE Government Portal. 2026. "Children's Digital Safety." https://u.ae/en/information-and-services/social-affairs/Priority-groups/children/Childrens-digital-safety (accessed 17 November 2026).

UAE Legislation. 2025. "Federal Decree by Law Regarding Child Digital Safety." Record of Federal Decree by Law No. (26) of 2025: issued 1 October 2025, effective 1 January 2026, Official Gazette No. 809 (supplement 1), 14 October 2025. English translation. https://uaelegislation.gov.ae/en/legislations/3912 (accessed 17 November 2026; rendered page).

UAE Legislation. 2026. "Cabinet Resolution No. (106) of 2026 Regarding the Regulation of Children's Access to Social Media Platforms." English translation; issued 17 June 2026, effective 30 June 2026, Official Gazette No. 826, 29 June 2026. https://uaelegislation.gov.ae/en/legislations/4506 (accessed 17 November 2026).

WAM (Emirates News Agency). 2025. "UAE Government Issues Federal Decree-Law on Child Digital Safety." 26 December 2025. https://www.wam.ae/en/article/15xvbqx-uae-government-issues-federal-decree-law-child (accessed 17 November 2026).

WAM. 2026a. "Child Digital Safety Council Holds Inaugural Meeting, Sets Framework, Priorities." 12 February 2026. https://www.wam.ae/en/article/bypcbux-child-digital-safety-council-holds-inaugural (accessed 17 November 2026).

WAM. 2026b. "Child Digital Safety Council Discusses Safety Mechanisms in Cyberspace." 30 April 2026. https://www.wam.ae/en/article/17749n7-child-digital-safety-council-discusses-child (accessed 17 November 2026).

WAM. 2026c. "UAE Cabinet Issues Resolution Regulating Children's Access to Social Media Platforms." 18 June 2026. https://www.wam.ae/en/article/c0scy35-uae-cabinet-issues-resolution-regulating-childrens (accessed 17 November 2026).

WAM. 2026d. "Minister of Family: UAE Advancing Regulatory Framework That Enables Children to Learn, Create, Develop Digital Skills in Safe, Balanced Environment." 1 July 2026. https://www.wam.ae/en/article/c103ld4-minister-family-uae-advancing-regulatory-framework (accessed 17 November 2026).

Sources: EPIC-PP-2026-044

All links checked 17 November 2026 (Asia/Dubai). "Route" records how each source was obtained.

Dated source log

Date checked	Key	Route	Status
17 Nov 2026	UAE Legislation 2025	Opened (rendered page); the download file returned HTTP 403	Retrieved, English text arts 1 to 20 read; issued 1 Oct 2025, effective 1 Jan 2026, Gazette 809 (supp. 1)
17 Nov 2026	UAE Legislation 2026	Opened (rendered page)	Retrieved, English text arts 1 to 9 read; issued 17 Jun 2026
17 Nov 2026	WAM 2025	Opened (rendered page)	Retrieved; dated 26 Dec 2025
17 Nov 2026	WAM 2026a	Opened (rendered page)	Retrieved; dated 12 Feb 2026
17 Nov 2026	WAM 2026b	Opened (rendered page)	Retrieved; dated 30 Apr 2026
17 Nov 2026	WAM 2026c	Opened (rendered page)	Retrieved; dated 18 Jun 2026
17 Nov 2026	WAM 2026d	Opened (rendered page)	Retrieved; dated 1 Jul 2026
17 Nov 2026	UAE Government Portal 2026	Opened	Retrieved; page undated
17 Nov 2026	Baker McKenzie 2026	Opened	Retrieved; dated 8 Jan 2026
17 Nov 2026	Clyde & Co 2026	Opened	Retrieved; dated 26 Jan 2026
17 Nov 2026	Digital Policy Alert 2026	Opened	Retrieved; event record
17 Nov 2026	Economy Middle East 2026	Opened	Retrieved; dated 16 Feb 2026
17 Nov 2026	Kaspersky 2024	Opened PDF	Retrieved; released Oct 2024
17 Nov 2026	Prime Minister of Australia 2026	Opened	Retrieved; dated 16 Jan 2026
17 Nov 2026	Meta 2026	Opened	Retrieved; dated 12 Aug 2026, updated 9 Nov 2026
17 Nov 2026	eSafety Commissioner releases and compliance update	Requested	Not retrieved: connection error. Not used
17 Nov 2026	Ofcom children's codes	Requested	Not retrieved: HTTP 403. Not used
17 Nov 2026	World Bank population aged 0 to 14 (API)	Requested	Not retrieved: timeout. Not used

Calculations by EPIC

- End of the transition under Cabinet Resolution No. 106 of 2026: 30 June 2026 plus 12 months = about 30 June 2027.