

ARTICLE

# A Digital Milestone: Understanding the UAE's New Social Media Ban for Minors Under 15

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## INTRODUCTION

On 18 June 2026, the United Arab Emirates (the “**UAE**”) issued Cabinet Resolution No. (106) of 2026 (the “**Resolution**”) establishing a minimum age requirement of 15 years for social media use and access. This was within 3 days of the United Kingdom (the “**UK**”) introducing a proposal to ban social media for children under the age of 16. These measures go beyond a simple prohibition on social media access by introducing world-leading safeguards that restrict high-risk platform features, including livestreaming and interactions with unknown users for children under 16.<sup>1</sup>

Such developments within days of each other demonstrate the growing global and regional concerns over the exploitation of minors online, including exposure to inappropriate content, unsafe interactions, data privacy violations and digital addiction. The Resolution marks a pivotal shift in the UAE’s regulatory landscape serving to implement and enforce the foundational provisions of Federal Decree-Law No. 26 of 2025 on Child Digital Safety (the “**CDS Law**”),<sup>2</sup> enacted in October 2025 and taking effect on 1 January 2026.<sup>3</sup> Together, this integrated legislative framework establishes a strict compliance and enforcement regime governing how children interact within the digital realm.

## WHY THE UAE HAS INTRODUCED A RESOLUTION

The Resolution introduces a structured, age-appropriate framework designed to regulate children's access to social media in a manner that prioritises safety, wellbeing and healthy development. Rather than restricting access outright, the framework seeks to ensure that children can benefit from digital technologies while being protected from age-inappropriate risks. It establishes a minimum age of 15 for personal social media accounts, imposes additional safeguards for users aged 15 to under 16 and permits participation in non-harmful content under defined conditions. At its core, the framework is intended to support children's development, strengthen family involvement and promote a more balanced relationship between children and digital technologies.

The introduction of the Resolution reflects the growing recognition that children are being exposed to digital platforms at increasingly younger ages and that existing regulatory approaches must evolve to address emerging risks. As technology becomes more integrated into everyday life, the UAE has adopted a preventative approach that seeks not only to respond to harm but also to reduce the likelihood of harm occurring in the first place. The framework acknowledges the importance of ensuring that children's development continues to be shaped by meaningful social interaction, education, cultural engagement and real-world experiences alongside their use of technology.

More broadly, the Resolution signals the UAE's long-term vision for a digital future that supports children's wellbeing whilst remaining consistent with national values and societal priorities. It reflects a commitment to fostering a safe and balanced online environment through coordinated action by regulators, platforms and families. By emphasising responsible digital participation, parental engagement and age-appropriate safeguards the framework aims to ensure that technological advancement enhances growth in a way that does not undermine children's development and future opportunities.<sup>4</sup>

## SCOPE OF APPLICATION AND COMPLIANCE FRAMEWORK

The Resolution has already come into effect and applies universally to all individuals and social media platforms operating within the UAE or directing their services toward users in the country as set out under Article 2 of the Resolution. To enforce this threshold, platforms are mandated to implement robust, accurate and reliable age-verification mechanisms, including digital identity verification and artificial intelligence-supported biometric technologies. Crucially, the simple self-declaration of age will no longer be accepted as a valid form of verification.

In practice, platforms are granted a transitional grace period of up to 12 months to bring their operations into full alignment with these new standards as mentioned under Article 8 of the Resolution. Within this timeframe, social media providers must actively monitor and disable any existing accounts operated by children under the age of 15, adopt systems to prevent users from bypassing age-verification protocols and strictly refrain from processing or utilizing children's personal data for targeted advertising or behavioural profiling,<sup>5</sup> as specified under Article 5 of the Resolution.<sup>6</sup>

Recognizing the practical challenges associated with implementation, the framework providing a 12-month transition period enables platforms to adopt the necessary measures in a phased and manageable manner. Additional guidance and technical requirements may also be issued by the relevant authorities to support compliance and facilitate a consistent approach to implementation across the sector.<sup>7</sup> This pivotal legislative shift underscores the UAE's progressive approach to lawmaking, ensuring that its statutory frameworks evolve alongside modern digital realities to uncompromisingly prioritize child safety.

**Federal Decree by Law No. (26) of 2025  
Regarding Child Digital Safety**

**We, Mohamed bin Zayed Al Nahyan, President of the United Arab Emirates,**

- Having reviewed the Constitution;
- Federal Law No. (1) of 1972 Regarding the Competences of Ministries and the Powers of Ministers, as amended;
- Federal Decree by Law No. (3) of 2003 Regarding the Regulation of the Telecommunications, as amended;
- Federal Law No. (3) of 2016 Regarding the Child Rights Law (Wadeema), as amended;
- Federal Decree by Law No. (34) of 2021 Regarding the Countering Rumors and Cybercrimes, as amended;
- Federal Decree by Law No. (45) of 2021 Regarding the Protection of Personal Data;
- Federal Decree by Law No. (55) of 2023 Regarding the Regulation of Media;
- Federal Decree by Law No. (42) of 2024 Regarding the Establishment and Regulation of the Education, Human Development, and Community Council; and
- Upon the proposal of the Minister of Family, and the approval of the Cabinet.

**Hereby promulgate the following Decree by Law:**

**Article (1)**

**Definitions**

For the purposes of implementing the provisions of this Decree by Law, the following terms and expressions shall have the meanings assigned to each of them, unless the context requires otherwise:



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## **IMPACT ON MINOR USERS AND CONDITIONAL ACCESS CONTROLS**

In terms of direct application, this legislative framework fundamentally rewrites how minors interact with digital platforms in the UAE. Individuals under the age of 15 are subject to an absolute prohibition, barring them from creating accounts, maintaining a social media presence or accessing the full features of these platforms, as set out under Article 3 of the Resolution. Furthermore, the Resolution eliminates any parental loophole, stipulating that parental consent cannot be utilized to bypass or exempt a child under the age of 15 from this restriction.

For minors who meet the age threshold, specifically those aged 15 and 16, access is no longer unrestricted. Platforms are legally required to enforce strict operational parameters for this demographic. This conditional usage model mandates the implementation of rigorous parental controls, age-appropriate content filtering, restricted user-to-user interactions and regulated time limits on daily usage to mitigate digital overreliance.<sup>8</sup>

## **A MINOR'S PERSPECTIVE**

Whilst it is inevitable that some tech-savvy children may attempt to bypass age restrictions and access controls, the Resolution is specifically designed to minimize opportunities for such circumvention. A key feature of the framework is that responsibility is placed not only on users and families but also on social media platforms, which are required to implement effective age assurance and safety mechanisms capable of detecting and preventing unauthorized access.

The regulatory framework further strengthens compliance by exposing platforms to enforcement action where they fail to meet their obligations. Depending on the nature and severity of the breach, authorities may impose administrative penalties or in serious cases, order partial or complete blocking of a platform's services. Given the potential commercial and operational consequences of non-compliance, platforms are likely to adopt robust verification and monitoring measures to reduce the risk of children bypassing the prescribed safeguards.

As a result, although no regulatory system can entirely eliminate attempts to evade restrictions, the combination of platform accountability, regulatory oversight and significant enforcement powers is intended to make circumvention substantially more difficult and less widespread in practice.

## **WHAT ABOUT THE CHILDREN WHO ARE ALREADY EXPOSED?**

The framework acknowledges that social media has become an established part of many children's daily lives and therefore adopts a gradual and supportive approach to implementation. Rather than relying solely on restrictions, the Resolution seeks to facilitate a managed transition by providing practical guidance and encouraging healthier digital habits among children and their families.

To support this transition, families will have access to awareness initiatives, guidance materials and tools designed to promote balanced technology use. These measures are intended to encourage greater participation in activities such as sports, education, creative pursuits and other age-appropriate forms of engagement, while helping children develop new routines and reduce overreliance on social media platforms.

More broadly, the approach reflects the Resolution's objective of fostering children's overall wellbeing by striking an appropriate balance between digital participation and real-world social, cultural and developmental experiences. It also reinforces the shared responsibility of both platforms and families in creating a safer and healthier digital environment for children.<sup>9</sup>

## **HOW PARENTS/CAREGIVERS AND GUARDIANS MUST COMPLY**

The Resolution places significant responsibility on parents and other caregivers in supporting children's safe use of digital platforms. In addition to the obligations imposed on social media providers, caregivers are expected to play an active role in ensuring compliance with the framework and protecting children from online risks.

Set out under Article 6 of the Resolution, caregivers must not facilitate or permit a child to create or access a social media account where doing so would breach the applicable age requirements. They are also prohibited from undermining age verification measures, including by providing inaccurate information or otherwise assisting a child in circumventing the platform's access controls.

Beyond compliance obligations, the Resolution emphasises the importance of ongoing parental supervision and digital education. Caregivers are expected to monitor children's online activities appropriately, take reasonable steps to prevent exploitation or exposure to harmful content, and promote safe and responsible digital behaviour. This includes helping children understand the risks associated with social media and encouraging online practices that are suitable for their age, maturity and developmental needs. Caregivers may also be subject to any additional responsibilities imposed under the wider child digital safety legislative framework and its implementing regulations.<sup>10</sup>

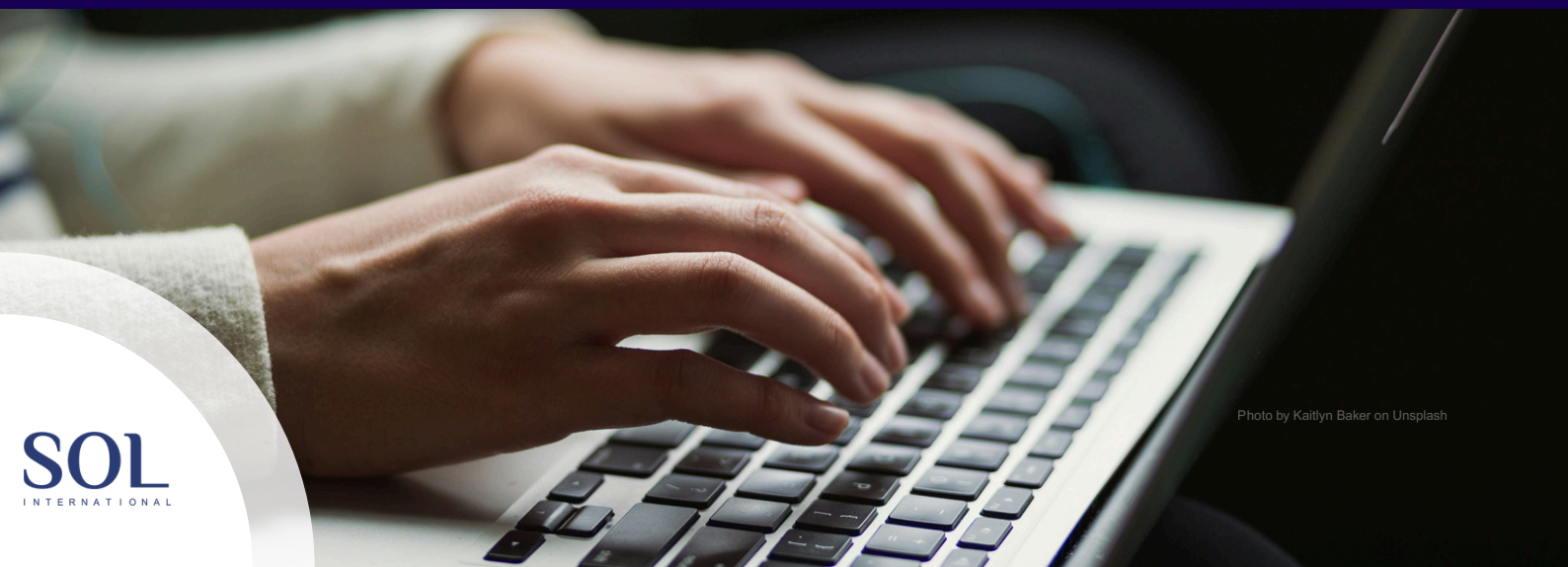


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## HOW SCHOOLS MUST COMPLY

The Resolution recognises schools as key partners in promoting children's digital wellbeing and supporting the implementation of the wider child digital safety framework. Alongside the obligations imposed on social media platforms and caregivers, educational institutions are expected to foster digital literacy, online safety awareness and responsible digital behaviour among students. This may include incorporating digital safety principles into educational programmes, awareness initiatives and age-appropriate learning activities that help children understand online risks such as cyberbullying, harmful content, privacy concerns and online exploitation.

The framework also acknowledges the important role that teachers, parents and caregivers play in reinforcing safe online practices. By supporting training initiatives, awareness programmes and the distribution of guidance materials, schools can help ensure a consistent approach to digital safety both inside and outside the classroom. More broadly, the Resolution adopts a preventative approach aimed at developing critical thinking skills, responsible technology use and healthier digital habits, enabling children to engage with online environments more safely and confidently as they grow.<sup>11</sup>

## THE IMPACT OF THE RESOLUTION ON SOCIAL MEDIA PLATFORMS

The Resolution confirms that responsibility for enforcement rests with the designated regulatory authorities and integrates non-compliance into the wider child digital safety regime, rather than establishing a separate penalties framework of its own. As a result, breaches are addressed through the enforcement mechanisms and administrative sanctions set out under Article 5 and briefly addressed under Article 7 of the Resolution.

Where a social media platform is found to have violated its obligations or failed to meet the required standards, the competent authorities may take a range of corrective and enforcement measures. These include warnings, administrative penalties, platform restrictions or in more serious cases, partial or complete blocking of the service. Consistent with the principle of graduality, enforcement action is expected to be proportionate to the nature and severity of the breach.<sup>12</sup>

The Resolution is likely to require an initial period of operational adjustment, particularly in relation to the implementation of age assurance mechanisms and enhanced child safety features. However, many major social media platforms have already begun introducing similar measures in response to evolving regulatory expectations in other jurisdictions, meaning that a number of the required safeguards may already be partially in place.



## OVERSIGHT AND SUPERVISION OF SOCIAL MEDIA PLATFORMS

Article 7 and Article 8 of the Resolution provide that regulatory oversight of social media platforms is divided between the National Media Authority (the “NMA”) and the Telecommunications and Digital Government Regulatory Authority (the “TDRA”). The NMA is responsible for monitoring compliance with obligations relating to children's digital and media content, while the TDRA oversees adherence to the technical requirements established under the framework. Where either authority identifies non-compliance or negligence, it may take enforcement action, including issuing warnings, ordering partial or full platform blocking, closure measures or imposing administrative penalties. Any enforcement action must be applied progressively, reflecting the principle of graduality.

Both the NMA and the TDRA are required to provide periodic reports to the Child Digital Safety Council (the “CDSC”) detailing the level of compliance achieved by social media platforms, together with any enforcement measures and penalties imposed for violations. This reporting mechanism is intended to support ongoing regulatory monitoring and accountability.

The CDSC plays a central coordinating role by evaluating the risks and impacts associated with children's use of social media platforms, recommending measures to mitigate those risks, and facilitating cooperation among relevant federal and local authorities to ensure effective implementation of the regulatory framework.

In addition, the Council may issue guidance documents, standards and technical or regulatory requirements necessary for implementation. Such guidance may be developed following recommendations from the NMA and TDRA acting within their respective areas of responsibility.<sup>13</sup>

## THE DIFFERENCE BETWEEN THE EXISTING CDS LAW AND THE RESOLUTION

A distinguishing feature of the Resolution is its emphasis on prevention rather than solely enforcement. While existing cybercrime and child protection legislation remains critical in addressing unlawful conduct and responding to harm once it has occurred, this framework adopts a more proactive approach aimed at reducing risks before they materialise.

To achieve this, the Resolution introduces a range of preventative safeguards, including age-based access restrictions, age verification requirements, platform compliance obligations, parental oversight measures and safety-by-design standards. By imposing these obligations at the outset, the framework seeks to create a safer digital environment for children and minimise exposure to harmful content and online risks before they arise.<sup>14</sup>

### Cabinet Resolution No. (106) of 2026

#### Regarding the Regulation of Children's Access to Social Media Platforms

##### The Cabinet:

- Having reviewed the Constitution;
- Federal Law No. (1) of 1972 Regarding the Competences of Ministries and the Powers of Ministers, as amended;
- Federal Decree by Law No. (3) of 2003 Regarding the Regulation of the Telecommunications, as amended;
- Federal Law No. (3) of 2016 Regarding the Child Rights Law “Wadeerna”, as amended;
- Federal Decree by Law No. (34) of 2021 Regarding Countering Rumors and Cybercrimes, as amended;
- Federal Decree by Law No. (55) of 2023 Regarding Media Regulation;
- Federal Decree by Law No. (42) of 2024 Regarding the Establishment and Regulation of the Education, Human Development and Community Development Council;
- Federal Decree by Law No. (11) of 2025 Establishing and Regulating the National Media Authority;
- Federal Decree by Law No. (26) of 2025 Regarding Child Digital Safety; and
- Upon the proposal of the Minister of Family and the approval of the Cabinet,

Hereby resolves as follows:

## CONCLUSION

Ultimately, this legislative intervention establishes the UAE as the pioneer within the Arab region to enforce such comprehensive digital age restrictions. By implementing these measures, the nation aligns its statutory framework with recent global benchmarks enacted across the UK, Australia and various European jurisdictions. Through this Resolution, the UAE successfully strikes a critical regulatory balance, preserving necessary digital access for youth while embedding the safeguards required to guarantee their safety online. The impact and the execution of the Resolution remains to be seen. Nevertheless, it lays the foundation for a safer, more secure and accountable digital environment for future generations.

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# Sarah Malik FCIArb

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Sarah Malik is an award-winning lawyer who achieved 'Litigator of the Year' at the first GCC Women in Law Awards 2022 and received an honourable mention as 'Law Firm Leader of the Year' at the same awards. SOL was set up in 2018 and has become internationally recognized brand of repute in all aspects of dispute resolution. In 2022, SOL was listed as a 'Firm to Watch in Dispute Resolution: Arbitration and International Litigation' by Legal 500 EMEA. In 2023, Sarah was recognized in the Arbitration Powerlist in Private Practice in the Middle East by Legal 500 EMEA.



Sarah is a published author of two legal texts. She is also appointed as Adjunct Faculty in Law teaching LLM and LLB students in Dubai, LLB students in Riyadh and Fashion Law students in Milan. Sarah acts as Counsel in multi-jurisdictional disputes and is a sought after international public speaker on thought leadership. Sarah holds various international advisory and Board positions.

Sarah is also retained as a personal advisor to high net-worth clients, acts as external GC, and undertakes sports, fashion, and entertainment law. She runs multiple businesses in addition to SOL and is recognized for her business acumen.

# Prarthana Kumar

Legal Intern

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Prarthana Kumar joined SOL International Ltd. in June 2026 as a Legal Intern. She recently graduated with an LLB (Hons) in Law from Middlesex University, where she developed a strong foundation across a broad range of legal disciplines and a particular interest in commercial and international legal practice. Prarthana has gained practical legal experience in banking and finance, wills and estates, and dispute resolution. These experiences have strengthened her legal research, analytical and drafting skills, while providing valuable insight into both contentious and non-contentious matters.



At SOL International, Prarthana supports the firm's legal team on a variety of domestic and cross-border matters. Her responsibilities include conducting legal research, drafting and legal correspondence, reviewing legal documents, preparing case materials and assisting with litigation and arbitration matters. Prarthana is currently working towards qualifying as a solicitor. She has a particular interest in international arbitration, commercial litigation and cross-border dispute resolution and is committed to developing her expertise in these areas while contributing to the firm's international practice.