DEPARTMENT OF THE PRIME MINISTER AND CABINET
TE TARI O TE PIRIMIA ME TE KOMITI MATUA

12 August 2026

Ref: OIA-2026/27-0056

[redacted]

Tēnā koe [redacted],

Official Information Act request relating to Information withheld in response to OIA-2024/25-0888

Thank you for your Official Information Act 1982 (the Act) request, which was received by the Department of the Prime Minister and Cabinet (DPMC) on 20 July 2026. You requested:

> *I make a request under the Official Information Act 1982. This is a new request.*
>
> *It concerns information DPMC withheld in its response of 19 June 2025 to a previous request, reference OIA-2024/25-0888, published at https://www.dpmc.govt.nz/sites/default/files/2025-07/dpmc-roia-oia-2024-25-0888.pdf.*
>
> *I was not the requester in that matter. The documents below are identified by reference to that published response, so they should be readily locatable.*
>
> *Information requested*
>
> *1. The emails exchanged in confidence as part of the process to formulate advice, and the draft talking points, for the announcement to the media on 11 May 2025 that the Minister of Education, Hon Erica Stanford, would be leading the government work investigating possible restrictions on access to social media by young people. These were withheld in full under sections 6(a), 9(2)(f)(iv) and 9(2)(g)(i) in OIA-2024/25-0888.*
>
> *2. The briefings provided by DPMC's Policy Advisory Group to the Prime Minister identified as relevant in OIA-2024/25-0888, withheld in their entirety under sections 9(2)(f)(iv) and 9(2)(g)(i).*
>
> *3. The information redacted from the covering emails released as Item 1 of OIA-2024/25-0888 ("RE: Copy of Draft Bill", 29 April 2025, between the Prime Minister's Chief of Staff and DPMC's Policy Advisory Group) under sections 9(2)(f)(iv) and 9(2)(g)(i).*
>
> *4. Any advice, briefing, comment or assessment prepared by DPMC concerning the draft Member's Bill titled Social Media (Age Appropriate Users) Bill, including any advice on its content, feasibility, or the policy process for taking it forward.*
>
> *5. Any briefing, aide-mémoire, talking points, meeting record, file note or advice held by DPMC concerning a proposal to restrict or age-restrict social media access for persons under 16, or concerning the Children's Online Safety Society, B416, or the Before16 Charitable Trust, for the period 1 January 2024 to 31 December 2024. (My earlier request to DPMC covered 2025 onwards only; this item covers the preceding year.)*
>
> *Search terms*
>
> *To assist, I ask that searches include all of the following names, which refer to the*

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same initiative or its representatives: "B416", "Before16", "Before 16", "Before16 Charitable Trust", and "Children's Online Safety Society". I note that the aide-mémoire provided to the Prime Minister on 17 April 2025 was sent under the name Children's Online Safety Society rather than B416, so a search confined to "B416" would not capture it. I also ask that searches include Cecilia Robinson, Anna Mowbray, Anna Curzon, Blair Knight, Malindi MacLean, Nicole Green, Dr Samantha Marsh, Dr Maneesh Deva, and Holly Brooker (credited as the source of Appendix 3 to the aide-mémoire, in connection with "Makes Sense").

Public interest and the withholding grounds

Sections 9(2)(f)(iv) and 9(2)(g)(i) are both subject to the public interest test in section 9(1), and the balance has materially changed since June 2025:

– More than a year has passed since the advice was tendered and the announcement made.
– The policy is no longer under consideration but public: the Government announced the work programme, the Prime Minister publicly proposed restricting under-16 access, and legislation has since been introduced and considered by select committee. The confidentiality of advice and the protection of free and frank expression carry less weight once the decision has been taken and announced.
– The public interest in understanding how this policy was developed is high. The published record shows an aide-mémoire from an advocacy organisation reaching the Prime Minister on 17 April 2025, being forwarded to officials with the instruction that the Prime Minister "will be keen to respond to this – could we please work something up?", a draft Member's Bill being provided to officials on 29 April, and the policy being announced within weeks. Where an organised group lobbying to shape legislation appears to have influenced the development of a Government policy, the public interest in seeing the advice that shaped it is significant.
– Where any individual's personal contact details appear, I ask that they be redacted under section 9(2)(a) rather than used to withhold whole documents.

On section 6(a): I note this ground is not subject to the public interest test, and that it was applied to emails and draft talking points concerning a domestic announcement about which Minister would lead a domestic work programme. If section 6(a) is relied on again, please identify specifically which information attracts it and explain how the security or defence of New Zealand, or its international relations, would be prejudiced, as section 19 requires. If section 6(a) applies to only part of the material, please release the balance under section 17.

For transparency and ease of reference I have included a copy of the response to OIA-2024/25-0888 as highlighted in your request attached as Appendix A.

In relation to parts [1], [2] and [3] of your request, the information identified as relevant to OIA-2024/25-0888 as referenced has been reassessed under the Act and continues to be withheld under the same withholding grounds as listed below:

- s6(a), to protect the security or defence of New Zealand or the international relations of New Zealand
- s9(2)(f)(iv), to maintain the confidentiality of advice tendered by or to Ministers and officials
- s9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinion.

In relation to your comment regarding section 6(a) of the Act, the refusal ground covered email discussions or correspondence between DPMC officials and another country around the issue of restricting access to social media for younger people. To release the information provided in confidence by another country would risk our relationship with that country.

In relation to parts [4] and [5] of your request, searches were completed with the parameters you have given (including each individually named person) and the information identified as in scope remain the emails and briefings withheld in full in our previous response to you for OIA-2024/25-0888.

Nothing else has been identified as relevant to your request.

You have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the Act.

This response will be published on the DPMC website during our regular publication cycle. Typically, information is released monthly, or as otherwise determined. Your personal information including name and contact details will be removed for publication.

Nāku noa, nā



Janine Smith
Deputy Chief Executive, Policy and Delivery Unit

DEPARTMENT OF THE PRIME MINISTER AND CABINET
TE TARI O TE PIRIMIA ME TE KOMITI MATUA

19 June 2025

[redacted]

Ref: OIA-2024/25-0888

Dear [redacted]

Official Information Act request relating to social media use and young people

Thank you for your Official Information Act 1982 (the Act) request received by the Department of the Prime Minister and Cabinet (DPMC) on 12 May 2025. You requested:

> *"Any information held, produced or received by the Department of Prime Minister and Cabinet since November 27, 2023 related to:*
> - *An age limit for social media use*
> - *The impacts of social media use on young people."*

On 9 June 2025, I wrote to you extending the time limit for response by 11 working days, to 26 June 2025. The additional time was needed to complete consultations before a final decision was made on your request. I am now in a position to respond.

Information for Release

Please find attached a copy of emails identified as being relevant to your request, as set out in the table below.

Item	Date	Subject Line	Decision
Item 1	29/04/2025	RE: Copy of Draft Bill	Release covering emails, some information withheld under: s9(2)(a) s9(2)(f)(iv) s9(2)(g)(i) Refuse copy of Bill under: s18(d)
Item 2	21/04/2025	Re: Aide Memoire to Rt Hon Christopher Luxon - Protecting Children's Safety Online	Release with some information withheld under: s9(2)(a)

As marked on the released documents, some information has been withheld under the following sections of the Act:

- 9(2)(a) of the Act, to protect the privacy of individuals.
- 9(2)(f)(iv), to maintain the confidentiality of advice tendered by or to Ministers and officials
- 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinion.

Attached to the email for Item 1 was a copy of the draft Member's Bill. The draft Bill is publicly available on the National Party website at: assets.national.org.nz/SocialMediaAge-

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RestrictedUsersBill.pdf. Your request as it relates to the draft Member's Bill is refused under section 18(d) of the Act, on the basis that the draft Bill is already currently available.

Information Withheld

There are some emails that have been withheld in full. These were some emails exchanged in confidence as part of the process to formulate advice and some draft talking points for the announcement to the media on 11 May 2025 that the Minister of Education, Hon Erica Stanford would be leading the government work investigating possible restrictions of access to social media by young people. These emails have been withheld under the following sections of the Act:

- 6(a), to protect the security or defence of New Zealand or the international relations of New Zealand
- 9(2)(f)(iv), to maintain the confidentiality of advice tendered by or to Ministers and officials
- 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinion.

The announcement made by the Prime Minister was reported widely at the time in the media, such as on this RNZ item: www.rnz.co.nz/news/political/560623/social-media-ban-for-young-people-to-be-investigated-luxon.

The only other information identified as relevant to your request are some briefings provided by DPMC's Policy Advisory Group to the Prime Minister. These briefings are provided to the Prime Minister in confidence to support him in his role as leader of the Government and chair of Cabinet.

These briefings are withheld in their entirety under the following sections of the Act:

- 9(2)(f)(iv), to maintain the confidentiality of advice tendered by or to Ministers and officials
- 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinion.

Where section 9 of the Act applies, in making my decision, I have considered the public interest considerations in section 9(1) of the Act. No public interest has been identified that would be sufficient to outweigh the reasons for withholding that information.

You have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the Act.

This response will be published on the Department of the Prime Minister and Cabinet's website during our regular publication cycle. Typically, information is released monthly, or as otherwise determined. Your personal information including name and contact details will be removed for publication.

Yours sincerely



Janine Smith
Deputy Chief Executive, Policy

Item 1

From: ^Parliament: Cameron Burrows
To: Nikki Hurst
Cc: s9(2)(a): PM's Office
Subject: RE: Copy of Draft Bill
Date: Tuesday, 29 April 2025 1:51:39 pm
Attachments: image001.png
Social Media (Age Appropriate Users) Bill.pdf

Thanks Nikki

As I mentioned to Janine, s9(2)(f)(iv), s9(2)(g)(i)

Thanks
Cam

Cameron Burrows
Chief of Staff
Office of Rt Hon Chris Luxon

s9(2)(a)

From: Nikki Hurst <Nikki.Hurst@dpmc.govt.nz>
Sent: Tuesday, 29 April 2025 8:06 AM
To: Cameron Burrows <Cameron.Burrows@parliament.govt.nz>
Subject: Copy of Draft Bill

~~SENSITIVE~~ UNCLASSIFIED

Morning Cam,

Janine has let me know that the PM is interested in social media policy, and that there is a draft bill in this direction.

s9(2)(f)(iv), s9(2)(g)(i) could I please have access to the draft?

Nikki Hurst
Advisor
Policy Advisory Group
Department of the Prime Minister and Cabinet
P s9(2)(a)
M s9(2)(a)
E nikki.hurst@dpmc.govt.nz

[Copy of the draft Member's Bill that was attached to this email is publicly available at: https://assets.national.org.nz/SocialMediaAge-RestrictedUsersBill.pdf]

Released under the Official Information Act 1982

From: s9(2)(a): PM's Office
To: Nikki Hurst
Subject: Re: Aide Memoire to Rt Hon Christopher Luxon - Protecting Children"s Safety Online
Date: Monday, 21 April 2025 1:43:24 pm
Attachments: image001.png
Outlook-cid_image0.png

Hi there,

Yes - all good.

Let touch base on Wednesday.

s9(2)(a)

Get Outlook for iOS

From: Nikki Hurst <Nikki.Hurst@dpmc.govt.nz>
Sent: Monday, April 21, 2025 11:11:03 AM
To: s9(2)(a): PM's Office Anna Clark [DPMC] <Anna.Clark@dpmc.govt.nz>
Subject: Fw: Aide Memoire to Rt Hon Christopher Luxon - Protecting Children's Safety Online

~~IN CONFIDENCE~~ UNCLASSIFIED

Kia ora s9(2)(a) & Anna,

I'm still on leave tomorrow (Tuesday), but will get on to this Wednesday. I'm guessing we wouldn't actually send anything through until the PM is back from Europe at any rate.

Nikki Hurst
Advisor
Policy Advisory Group
Department of the Prime Minister and Cabinet
P s9(2)(a)
M s9(2)(a)
E nikki.hurst@dpmc.govt.nz

cid:image002.png@01D43609.296F69C0

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From: s9(2)(a): PM's Office
Sent: Friday, 18 April 2025 11:44 am
To: Nikki Hurst <Nikki.Hurst@dpmc.govt.nz>; Anna Clark [DPMC] <Anna.Clark@dpmc.govt.nz>
Cc: s9(2)(a): PM's Office
Subject: FW: Aide Memoire to Rt Hon Christopher Luxon - Protecting Children's Safety Online

FYI/FYA.

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PM will be keen to respond to this – could we please work something up? (When people are back!)

Many thanks
s9(2)(a)

From: s9(2)(a): PM's Office
Sent: Friday, 18 April 2025 11:41
To: Cecilia Robinson s9(2)(a)
Subject: RE: Aide Memoire to Rt Hon Christopher Luxon - Protecting Children's Safety Online

Good morning Cecilia,

Thank you very much for your email and for sharing this aide-memoire. I will pass it to the Prime Minister and to some of my colleagues for their information. We will come back to you.

Have a happy Easter.

Best regards
s9(2)(a)

s9(2)(a)
Office of the Prime Minister, Rt Hon Christopher Luxon
D: s9(2)(a) | M: s9(2)(a)
Parliament Buildings, Wellington 6160

From: Cecilia Robinson s9(2)(a)
Sent: Thursday, 17 April 2025 15:58
To: Christopher Luxon <Christopher.Luxon@parliament.govt.nz>
Cc: s9(2)(a): PM's Office
Subject: Re: Aide Memoire to Rt Hon Christopher Luxon - Protecting Children's Safety Online

Dear Prime Minister Luxon,

On behalf of the Children's Online Safety Society, I'm pleased to share the attached Aide Memoire outlining urgent steps to address the growing harm children face through unrestricted access to social media.

Building on your strong leadership in removing cellphones from schools, we believe there is now a critical opportunity to lead on broader online safety—at a time when New Zealand is falling behind other nations such as Australia, the UK and the US.

We recommend two key actions:

1. **Child Online Safety Legislation**, with obligations on platforms, a regulator, and enforceable standards; and

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2. **A National Awareness Campaign** to support parents and build consensus for change.

We would welcome the opportunity to discuss how this work could align with your Government's priorities for the wellbeing and safety of our tamariki.

Ngā mihi,
Cecilia Robinson

Cecilia Robinson
Co-CEO & Founder
s9(2)(a)



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AIDE MEMOIRE

From Children's Online Safety Society to Rt Hon Christopher Luxon

Protecting children's online safety: Solutions to prevent harm

17 April 2025

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Purpose of this briefing

To provide you with a high-level briefing on required Government action to address online harm to children. In short, a legislative fix is required as in other comparable countries. We are an outlier.

Summary of the problem and our recommended solution

Evidence shows that children and young people in New Zealand are exposed to a range of harms through unrestricted access to social media, including:

- mental health deterioration;
- cyberbullying;
- exposure to harmful, exploitative and violent content; and
- access to predators, grooming and sexual exploitation.

There is an urgent need for action, as the mental health of young people is being significantly harmed. This presents an opportunity for the Government to lead this action and prioritise the mental health, wellbeing and safety of children and young people in New Zealand in the lead-up to the 2026 general election, and building on the excellent work you have done on cell phones in schools.

Overseas jurisdictions, including Australia, the United Kingdom, the European Union and the United States have introduced legislation to protect young people online. We have not.

Children's Online Safety Society recommends a two-pronged solution of:

- **Child online safety legislation**: that would broadly include – obligations on certain social media platforms in relation to children under 16 years of age; a broad definition of social media platforms; an independent regulator to implement the framework; and industry codes and standards. The legislation would be broadly aligned with the Australian model.
- **Public awareness and education campaign**: that would include a national multimedia campaign to inform parents, build public consensus, and create a new norm around children's online habits.

Children's Online Safety Society recommends that the Government immediately initiates a policy process to develop a regulatory framework to protect children from online harm, with a view to introducing legislation in the next Parliamentary term.

Appendix 1 provides further information on the problem and solutions.

Appendix 2 provides a classification of online risks to children.

Appendix 3 provides a comparison of features of comparable international frameworks.

APPENDIX 1

Children's Online Safety Society

The Children's Online Safety Society is a group of New Zealanders that are concerned about the harmful impact of social media on our youth, and are committed to advocating for Government action and community awareness.

Social media is leading to several harms for children and young people

Children and young people in New Zealand are exposed to a range of harms through unrestricted access to social media.[1] These include mental health deterioration, cyberbullying, exposure to pornography, grooming, disordered eating, sextortion and exploitation, and violent content. Research and international examples show the negative impact of early and unsupervised use of these platforms.[2]

A continued failure to address the risks of social media to New Zealand's youth will lead to:

- continued and unsustainable demands on health, education and justice portfolios;
- New Zealand falling further behind comparative jurisdictions and potentially being in breach of the United Nations Convention on the Rights of the Child (UNCROC) to prioritise children's rights and online safety by failing to take adequate, proactive steps; and
- comparatively unhealthy and unproductive generations of New Zealanders, due to the residual issues from mental health illnesses, and unhealthy sexual and relationship impacts originating from social media harm.

In general, regulation of social media attempts to balance individuals' freedom of expression and the risk of online harm. However, overseas jurisdictions have recognised that there is an exception to this general approach for children and young people.[3] The vulnerability of children and young people to the harms associated with social media supports the need for proactive steps to be taken to protect them.

Currently, New Zealand is an outlier compared to other jurisdictions including Australia, the United Kingdom, the European Union, and the United States. All of these jurisdictions have legislative frameworks to address online harm for young people (see **Appendix 3** below for a comparison of features of comparable international frameworks). The lack of online child safety regulation in New Zealand presents an opportunity for the Government to proactively address these harms, prioritise the wellbeing of young people and align our regulations with comparable jurisdictions.

Proposed solution

We recommend a two-pronged approach to addressing social media harm for children, consisting of child online safety legislation and a public education campaign.

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1 Online risks arise when a child: (a) engages with and/or is exposed to potentially harmful content; (b) experiences and/or is targeted by potentially harmful contact; (c) witnesses, participates in and/or is a victim of potentially harmful conduct; and (d) is party to and/or exploited by a potentially harmful contract: Sonia Livingstone and Mariya Stoilova (2021) *The 4Cs: Classifying Online Risk to Children*. See **Appendix 2** below for more details.

2 For example, Netsafe's report from the Global Kids Online study (Pacheco and Melhuish, 2019) found that a quarter of children (9-17 years old) had been bothered or upset by something that happened online in the last year and nearly half of these children (46 percent) said they were fairly or very upset by that online experience. Almost half of teenagers (13-17) had been exposed to potentially harmful online content – including self-harm (20 percent) and suicide (17 percent) material. Of the teenagers who reported being exposed to potentially harmful content, 28 percent said they were "fairly" or "very" upset, and that number was higher for girls (38 percent) compared to boys (18 percent).

3 Professor Miriam Lips and Dr Elizabeth Eppel (2022) *Mapping Media Content Harms: A report prepared for Department of Internal Affairs* at 12.

Child online safety legislation

We recommend that the Government begins a policy process to develop a regulatory framework to protect children from online harm, with a view to introducing legislation in the next Parliamentary term.

We also recommend that the National Party includes this legislation in its election commitments for the 2026 election, to obtain a clear mandate for its enactment.

As a starting point, the design of the legislation should be broadly based on the Australian Online Safety Act 2021 (as amended by the Online Safety Amendment (Social Media Minimum Age) Act 2024). This could include the following features:

- obligations on certain social media platforms in relation to children under 16 years of age. This could take the form of the Australian approach, which requires platforms to take "reasonable steps" to prevent children under the age of 16 from having an account including age verification, or a requirement for platforms to provide warning labels and content advisories for children under 16;

- a broad definition of social media platforms, with the ability to include or exclude particular platforms in this definition through secondary legislation, to future-proof policy and ensure risk-proportionate regulation of social media platforms based on the risk of harm to children on that platform;

- an independent statutory body to regulate the framework – this could be a newly established regulator or a reformed and fully independent Netsafe with a new scope, powers, governance structure, and funding model. The regulator would be broadly modelled on Australia's eSafety Commissioner[4] and / or the UK's Ofcom Online Safety division,[5] and oversee implementation of industry codes, enforce standards, and ensure compliance with an age-based social media framework. We note that Netsafe, in its current form, does not have the independence or enforcement capability required to fulfil this role, therefore structural and legislative changes would be essential for Netsafe to fulfil this role effectively;

- industry codes and standards broadly aligned with those in Australia,[6] which would be approved, monitored and enforced by the new regulator; and

- enforcement mechanisms such as detection, prevention, removal, reporting and fines.

Public awareness and education campaign

We also recommend that the Government launch a national multimedia campaign to inform parents, build public consensus, and create a new norm around children's online habits. This should include:

- a formal statement acknowledging social media as high-risk for under-16s, stating that the Government cannot guarantee child safety on social media platforms and does not recommend their use for children under 16 years of age;[7] and

- information on current and emergent harms, media literacy and critical thinking skills to identify, avoid or respond to harmful content, and building skills to identify misinformation.

---

4 The eSafety Commissioner's role includes: awareness raising and education about online safety issues; investigating complaints about online abuse and illegal and restricted content; approving, monitoring and enforcing industry codes and standards; and collaborating with governments, organisations, advocates, community groups and tech industry representatives to guide regulatory policy: What we do | eSafety Commissioner.

5 Under the UK Online Safety Act 2023, Ofcom is responsible for publishing and enforcing Codes of Practice and other guidance: Ofcom's approach to implementing the Online Safety Act.

6 Register of industry codes and industry standards for online safety | eSafety Commissioner.

7 As an example, the U.S. Surgeon General made a statement saying "we cannot conclude social media is sufficiently safe for children and adolescents and [this Advisory] outlines immediate steps we can take to mitigate the risk of harm to children and adolescents."

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APPENDIX 2

The CO:RE classification of online risk to children

	Content Child engages with or is exposed to potentially harmful content	Contact Child experiences or is targeted by potentially harmful *adult* contact	Conduct Child witnesses, participates in or is a victim of potentially harmful *peer* conduct	Contract Child is party to or exploited by potentially harmful contract
Aggressive	Violent, gory, graphic, racist, hateful or extremist information and communication	Harassment, stalking, hateful behaviour, unwanted or excessive surveillance	Bullying, hateful or hostile communication or peer activity e.g. trolling, exclusion, shaming	Identity theft, fraud, phishing, scams, hacking, blackmail, security risks
Sexual	Pornography (harmful or illegal), sexualization of culture, oppressive body image norms	Sexual harassment, sexual grooming, sextortion, the generation and sharing of child sexual abuse material	Sexual harassment, non-consensual sexual messaging, adverse sexual pressures	Trafficking for purposes of sexual exploitation, streaming (paid-for) child sexual abuse
Values	Mis/disinformation, age-inappropriate marketing or user-generated content	Ideological persuasion or manipulation, radicalisation and extremist recruitment	Potentially harmful user communities e.g. self-harm, anti-vaccine, adverse peer pressures	Gambling, filter bubbles, micro-targeting, dark patterns shaping persuasion or purchase
Cross-cutting	**Privacy violations** (interpersonal, institutional, commercial) **Physical and mental health risks** (e.g., sedentary lifestyle, excessive screen use, isolation, anxiety) **Inequalities and discrimination** (in/exclusion, exploiting vulnerability, algorithmic bias/predictive analytics)			

Source: Livingstone & Stoilova, 2021

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APPENDIX 3

Features of comparable international frameworks

Online Safety Legislation	Australia	UK	EU	USA	Canada	NZ
Online Safety Law	Online Safety Act 2021	Online Safety Act 2023	Digital Services Act	In Progress – Draft KOSPA / COPPA 2.0	In Progress – Draft Bill C-63	Nil
Safety by Design approach	Y	Partially	Y	IP	IP	N
Secure by Design approach	–	Y	Y	IP	IP	N
Narrow coverage / Content focused (narrow focus on illegal content like CSAM, content that is harmful to children)	Y	Y	Y	IP	IP	N
Broad coverage / Systems focused (safety by design, child safety, design principles, privacy)	–	Y	Y	IP	IP	N
Duty of care approach	Y	Y	–	IP	IP	N
Risk Mitigation approach	Y	Y	Y	IP	IP	N
Detailed definition of illegal / harmful content and different approaches of the law to different types	Y	Y	–	IP	IP	N
Flexible definition of illegal content / material and law applies to all types of illegal content / material	–	–	Y	IP	IP	N
Generative AI legal capabilities	Y	Y	Y – AI Act	IP	IP	N
Algorithm / dark pattern restrictions	IP	Y	Y	IP	IP	N
Bans on targeted advertising profiling children	IP	Partially	Y	IP	IP	N
Transparency reports						
Strong transparency and reporting requirements with prescribed metrics. Includes detailed risk assessments.	Y	Y	Y	IP	IP	N
Risk Assessment required	Y Due 21 June 2025	Y Due July 2025	Y Due 16 March 2025	IP	IP	N
Voluntary reporting	N	N	N	IP	IP	Y
Independent Regulator						
Independent Regulator or competent authority → enforcement power → information gathering power	Y eSafety	Y Ofcom	Y Digital Services Coordinator/ Commission	IP	IP	N
The Industry drafts standards or Codes, which are approved, monitored and enforced by the Regulator	Y	N	Y	IP	IP	N
Regulator "holds the pen" / defines the standards or codes	N	Y	N	IP	IP	N
Strong powers to enforce compliance / redress – strong penalties / fines for non-compliance	Y 30,000 penalty units (currently AUD $9.9m)	Y up to £18 million or 10% GAT	Y up to 6% GAT	IP	IP	N
Turn off / service restriction powers – for failures to comply	N	Y	Y	IP	IP	N
Strong public facing complaints system	Y	Y	Y	IP	IP	N

Source: Holly Brooker, Makes Sense 2025

Released under the Official Information Act 1982