

CLIENT ALERT

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Building a Safer Digital World for Kids: Compliance Brief for ESOs Under Indonesia's GR 17/2025

The Indonesian Government has issued Government Regulation No. 17 of 2025 on the Governance of the Organization of Electronic Systems in Child Protection (GR 17/2025), which came into effect on 27 March 2025. This regulation was issued to implement Law No. 1 of 2024 on the Second Amendment to Law No. 11 of 2008 on Electronic Information and Transactions, specifically under Article 16A and Article 16B. It establishes a new regulatory framework for Electronic System Organizers (ESO) whose platforms are accessible to users under the age of 18.

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Although the regulation is already in force, ESOs are given a two-year transition period until 27 March 2027 to comply with the rules. During this time, they are expected to review and adjust their systems, policies, and internal procedures to meet the requirements.

Scope of Application

GR 17/2025 applies to both domestic and foreign ESOs, whether public or private. ESOs fall within the scope of the regulation if their platforms are specifically designed for children or reasonably likely to be accessed by children in Indonesia.

Self-Assessment and Risk Category

Furthermore, ESOs are required to conduct a self-assessment to determine the level of risk its platform may pose to child users. Based on this assessment, the platform must be classified under one of the following risk categories:

Risk Level	Description
High-Risk	Platforms that allow unsolicited interactions, contain addictive or harmful content, expose users to violent or sexual material, or negatively impact a child's mental or physical health.
Low-Risk	Platforms that do not exhibit any of the characteristics associated with high-risk platforms.

The results of this self-assessment must be submitted to the Ministry of Communication and Digital Affairs (MOCD), which has the authority to verify and, if necessary, reclassify ESOs' risk determinations.

Compliance Obligations: Age-Based Access, Privacy Settings, and Governance Duties

GR 17/2025 sets out age-based rules governing children's access to digital platforms, with consent requirements and access permissions varying depending on the child's age and the platform's risk classification. It establishes a minimum age of 3 years for online service use and groups children into five developmental categories to guide the appropriateness of features, content, and access levels.

To assist compliance efforts, GR 17/2025 categorizes child users into the following five developmental age groups:



ESOs are required to use these age classifications as a guide when configuring their platforms. This obligation aims to ensure that the features, content, and access levels are suitable for children at different stages of development. In fulfilling this duty, ESOs must consider the best interests of the child and ensure that access and usage are conducted safely and responsibly. Further technical provisions regarding the applicable age thresholds and their classifications will be detailed in a forthcoming Ministerial Regulation.

This segmentation is designed to align platform access with the child's developmental stage. Where account registration is required, ESOs must observe the applicable minimum age thresholds and implement the corresponding consent or objection procedures, as set out in the table below:

Age Group	Permitted Access	Consent Requirement	Access Condition
under 13 years	(a) services specifically designed for children; and (b) Low-risk platforms.	Parental or guardian consent is required.	Access is granted once parental or guardian consent is obtained within 24 hours.
13 to below 16 years	low-risk platforms		
16 to below 18 years	(a) low-risk platforms; and (b) High-risk platforms.	The child's consent may be relied upon.	(a) Access is granted to children under 17 only after parental or guardian consent is obtained within 24 hours; and (b) For children aged 17, access is granted if no objection is raised by a

			parent or guardian within 6 hours of notification.
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ESOs are also required to implement age verification mechanisms that are proportionate to the platform's risk level, ensuring that only eligible users may access the services. In parallel, platforms designed for, or likely to be accessed by, children must be configured by default to the highest level of privacy. While users may modify these settings, any changes must be supported by a Data Protection Impact Assessment (DPIA) and may be implemented on a permanent or temporary basis. These requirements also complement the broader obligations under Law No. 27 of 2022 on Personal Data Protection, and ESOs should ensure consistency across their internal privacy governance frameworks.

Key Platform Duties for Child Protection

In addition to access and privacy requirements, ESOs are also required to comply with the following key operational obligations, among others:

- (a) set clear age limits, verification mechanisms, and provide accessible reporting tools;
- (b) provide clear and accessible information that can be easily understood by children and their parents or guardians, among others age limitation in using the platforms, relevant privacy notice and community guidelines;
- (c) display clear indicators when tracking children's activity or location;
- (d) ensure third parties, including vendors or contractors to comply with child protection standards; and
- (e) appoint a child's personal data protection officer in line with personal data protection laws.

GR 17/2025 also identifies several prohibited practices considered detrimental to child safety, among others any use of deceptive interface designs (dark patterns) that manipulate user decisions, any collection of geolocation data without necessity and explicit consent; and profiling children.

Compliance Timeline and What ESOs Should Do Now

GR 17/2025 allows a two-year transition period until 27 March 2027 for ESOs to align with the regulatory requirements. During this time, administrative sanctions will not be imposed. Following the end of the transition period in 2027, any violation may be subject to certain sanctions ranging from a written warning to temporary suspension and access termination.

In more serious cases, non-compliance may also trigger criminal liability under Indonesia's Child Protection Law, particularly where harm or exploitation of children is involved. To mitigate these risks and ensure compliance, ESOs are expected to adopt core safeguards such as conducting a DPIA, applying default high-privacy settings, applying age verification, and providing child-friendly reporting

tools. These obligations apply not only to future platforms but also to existing ones and are essential to safeguarding child users at every stage of their digital experience.

While the regulation allows a two-year transition period, this should not be viewed as a reason to delay compliance as the ESOs may need to reconfigure their platform architecture, update data processing protocols (including parental consent flows), and implement robust age assurance mechanisms that align with the new requirements. This may involve deploying AI-based content filtering systems, revising user interface designs to reflect child-friendly defaults, strengthening data encryption standards, and conducting regular audits to demonstrate compliance. In addition, ESOs may need to review and possibly renegotiate third-party vendor contracts to ensure all service providers involved in data handling or user interaction adhere to the new child protection standards.

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We were named '**2023 In-House Counsel Choice – Most Recommended Law Firm**' by Hukum Online. These awards recognise our milestones as a recognised mid-size law firm. We were also rewarded the '**2023 Project Finance Deal of the Year**' and '**2023 Firm to Watch**' by Asian Legal Business (ALB), and a finalist of the '**2023 TMT Firm of the Year**'. In 2024, we proudly achieved recognition as '**2024 Best Midsize Full-Service Law Firms**' by Hukum Online.



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