

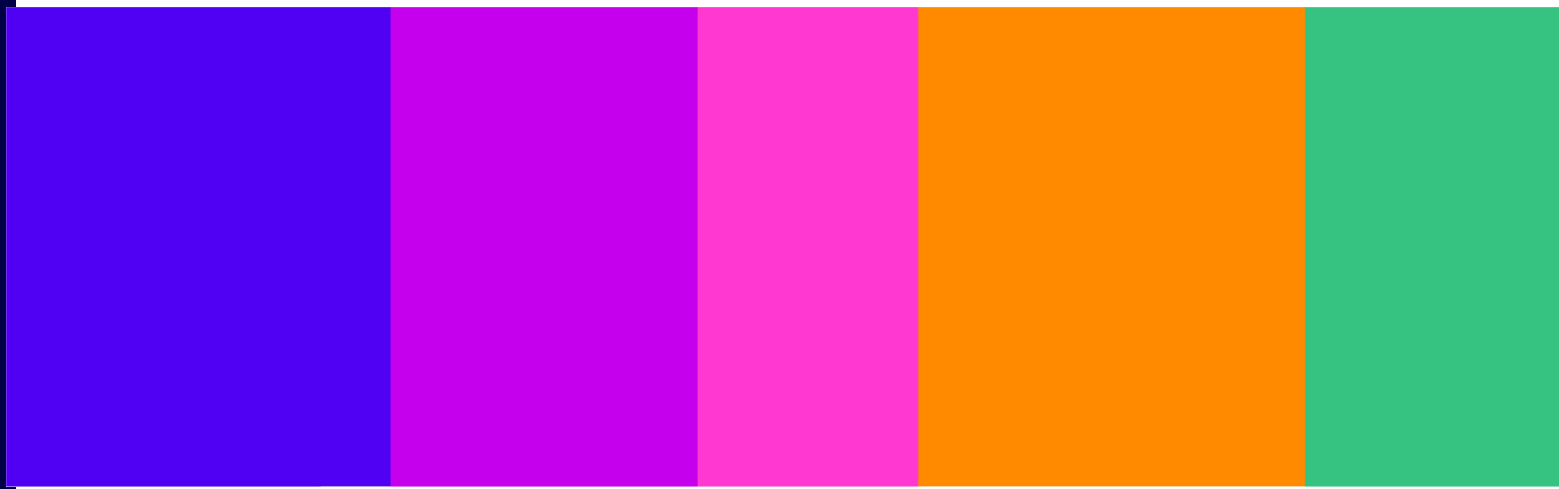
# Report on the use of app stores by children

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Report prepared under section 161 of the  
Online Safety Act 2023

Published 29 October 2026

For more information on this publication, please visit [ofcom.org.uk](https://www.ofcom.org.uk).



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# 1. Overview

**Ofcom has carried out an assessment of the role that app stores play in children's online experiences.** This includes assessing the current use and effectiveness of age assurance by app store providers. In line with our duties under the Online Safety Act 2023 (the Act), this report also explores whether children's online safety could be better protected by the greater use of age assurance or particular kinds of age assurance by app store providers, or by other measures. App stores are not currently regulated services under the Act.

**App stores play an important role in shaping children's online experiences.** App stores act as a key gateway through which children discover and access regulated services. They set rules for app developers and curate which apps children can discover, helping them to make choices and managing their ability to download. Our research found that three-quarters of children who go online said they most commonly did this using apps downloaded from an app store.

**App stores are part of the child's online user journey, along with devices, operating systems and regulated services.** App stores are not the only way that children access regulated services, and while all actors in this ecosystem have a part to play in keeping children safe online, it is the responsibility of regulated services to ensure they meet their children's safety duties, including regularly reviewing whether children are present on their services, and using highly effective age assurance where required.

**App stores could make greater use of highly effective age assurance to better protect children online.** All of the app stores we analysed relied on children declaring their age. While a small number used additional checks in limited circumstances, they did not consistently use any age assurance method to correctly establish if the user was a child, providing little incentive for children to self-declare an accurate age. App stores cannot play their part in reliably protecting children if highly effective age assurance is not used to determine which of their users are children.

**Highly effective age assurance alone is not enough.** App stores would also need reliable information about the age suitability and risk of children encountering harm on the apps they make available. Together, this could enable them to consistently apply effective age-based protections to keep children safe. Tools for parents and carers to support their children's online experiences could play a complementary role alongside age assurance and age-based protections.

**In our July 2026 Report on the Use of Age Assurance (July 2026 Age Assurance Report), we identified the need for continued innovation from the wider tech industry to strengthen existing protections for children under the Act.** Developments in system-level age assurance and approaches to make reliable age information available to app developers could help minimise unnecessary friction for users and support service-level protections for children. There have been some emerging developments from industry, and we want to see continued innovation to deliver better online safety outcomes for children.

**The approaches explored in this app store report raise important technical, policy and compliance considerations about any potential future regulatory model that involves app stores.** If the government decides to regulate app stores or introduce additional children's safety duties, they will need to consider which services would be in scope, regulatory and technical design, and interaction with the existing regulatory framework.

**Alongside this report, we have also published our [rapid assessment of highly effective age assurance at 16](#) to inform parliamentary debate on the draft social media ban regulations.** In that

assessment we identify that app stores, together with other parts of the ecosystem, could play a role in supporting implementation of the new age restrictions. Regardless of any future regulatory role for app stores, it is the responsibility of regulated services to demonstrate that their overall age assurance process is highly effective to meet both their existing duties and any new obligations.

## 2. Introduction, our duties and navigating the report

### Ofcom's general duties

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- 2.1 Ofcom is the UK's independent regulator for communications services, including telecommunications, post, broadcast TV and radio, as well as spectrum, and on-demand programme services. Under the Act, Ofcom is also the UK regulator for online safety. Under the Act, Ofcom's job is to make online services safer for the people who use them, especially children.

### Purpose of this report

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- 2.2 This report is produced and published in accordance with section 161 of the Act, to:
- a) assess what role app stores play in children encountering content that is harmful to children, search content that is harmful to children or regulated provider pornographic content by means of regulated apps<sup>1</sup> which the app stores make available;
  - b) assess the extent to which age assurance is currently used by providers of app stores, and how effective it is; and
  - c) explore whether children's online safety would be better protected by the greater use of age assurance or particular kinds of age assurance by such providers, or by other measures.
- 2.3 The findings in this report may inform the Secretary of State for the purpose of deciding whether and how to exercise the powers to regulate app stores in sections 215 and 216 of the Act.

### Legislative and regulatory context

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- 2.4 The Act is clear that responsibility for protecting children from harmful content rests with providers of regulated services, namely regulated user-to-user services, search services and services on which pornographic content is published or displayed. The Act does not place obligations on providers of app stores.
- 2.5 See our [January 2025 Age Assurance and Children's Access Statement](#) (January 2025 Statement) together with our [Guidance on highly effective age assurance and other Part 5 duties](#) (Part 5 HEAA guidance) and our [April 2025 Statement on Protecting Children from Harms Online](#) (April 2025 Statement) together with our [Guidance on highly effective age assurance for Part 3 services](#) (Part 3 HEAA Guidance) and accompanying regulatory documents and guidance for further detail.<sup>2</sup>
- 2.6 Part 5 of the Act imposes specific duties on service providers that display or publish pornographic content on their online services (Part 5 services). Specific duties are imposed on these services to use a form of age assurance that is highly effective at correctly

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<sup>1</sup> This means an app for a regulated service under the Act.

<sup>2</sup> See Volume 5: Annexes, specifically A4. Legal framework: Duties of providers and Ofcom in relation to the protection of children (A4.1 – A4.106).

determining whether a particular user is a child.<sup>3</sup> This is to ensure that children are not normally able to encounter such content on these services and also that the services keep easily understandable, durable, and up-to-date written records detailing their compliance measures. To comply, age assurance must be applied before a user is able to view any pornographic content or access the relevant service, unless the user has been determined to be an adult.

- 2.7 In July 2025, our [Protection of Children Code of Practice for user-to-user services](#) (Protection of Children Code) came into force. Under Part 3 of the Act, user-to-user services, including services that may host user-generated content that is harmful to children (including pornography), and search services are required to carry out a children's access assessment to determine if they are "likely to be accessed by children". Where a user-to-user service determines that it is likely to be accessed by children it must undertake a children's risk assessment to assess the level of risk of children encountering content harmful to children. It must also comply with duties requiring them to mitigate and manage risks relating to such content. For the purposes of the Act this includes primary priority content (PPC)<sup>4</sup>, priority content (PC)<sup>5</sup> and non-designated content (NDC).<sup>6</sup>

## Ofcom's duty to assess and report on use of app stores by children

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- 2.8 Section 161 of the Act requires Ofcom to assess what role app stores play in children encountering harmful content by means of regulated apps that app stores make available. Accordingly, this report focuses on app stores' role in children encountering harmful content through regulated apps, rather than on harmful content that may be present on app stores themselves. References throughout this report to "harmful content" should also be understood as content harmful to children within the meaning of the Act. This report does not assess app stores' role in children encountering illegal content under the Act.
- 2.9 For the purpose of section 161 of the Act and this report, the word "app" includes an app for use on any kind of device, and references to app stores should be read accordingly.<sup>7</sup> As a result, app stores are considered by reference to their function of making apps available for download or purchase to users.
- 2.10 In performing this function, app stores are not considered to be either user-to-user or search services under the Act.<sup>8</sup> This does not preclude providers of app stores from operating other services or functionalities that may separately fall within scope of Part 3 of the Act.
- 2.11 While we consider app stores in their wider context, this report is not intended to represent our final view on other parts of the wider ecosystem, such as devices and operating systems, and whether they can or should play a role in protecting children online.

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<sup>3</sup> Section 236(1) of the Act: "a child means a person under the age of 18".

<sup>4</sup> Section 61 of the Act.

<sup>5</sup> Section 62 of the Act.

<sup>6</sup> Section 60(2)(c) of the Act.

<sup>7</sup> Section 161(5) of the Act.

<sup>8</sup> Section 146(11)(b) of the Act includes app stores, through which a mobile app for a regulated service may be downloaded or otherwise accessed, as an example of an access facility.

- 2.12 Under sections 215 and 216 of the Act, the Secretary of State may by regulations amend any provision of the Act to make provision for or in connection with the regulation of app stores. Having considered Ofcom's report, the Secretary of State may make regulations where they consider that there is a material risk of significant harm to an appreciable number of children presented by either of the following, or by both taken together:
- a) harmful content present on app stores, or
  - b) harmful content encountered by means of regulated apps available in app stores.

## Recent developments in the wider policy and regulatory landscape

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- 2.13 We have recently published reports and wider assessments related to age assurance and content harmful to children, which we have considered in this report where relevant.
- 2.14 In July 2026, we published our [July 2026 Age Assurance Report](#), which assessed how regulated services have implemented and used age assurance to protect children from online harm. This showed that age checks by regulated services have increased significantly and are increasingly shaping children's online experiences.
- 2.15 In October 2026, we published our statutory [report on content that is harmful to children](#), and our advice on whether and how it is appropriate to make changes to the categories of this content in the Act.
- 2.16 Alongside this report, we have published a [rapid assessment of highly effective age assurance at 16](#) to inform parliamentary debate on the new age restrictions. Where relevant, we have considered the role that other parts of the tech sector, including app stores, might play in providing an accurate determination of age or age group.
- 2.17 Following publication of the draft regulations later this year, we will consult on draft guidance on highly effective age assurance at 16 to help services understand and comply with their future obligations.

## What are app stores?

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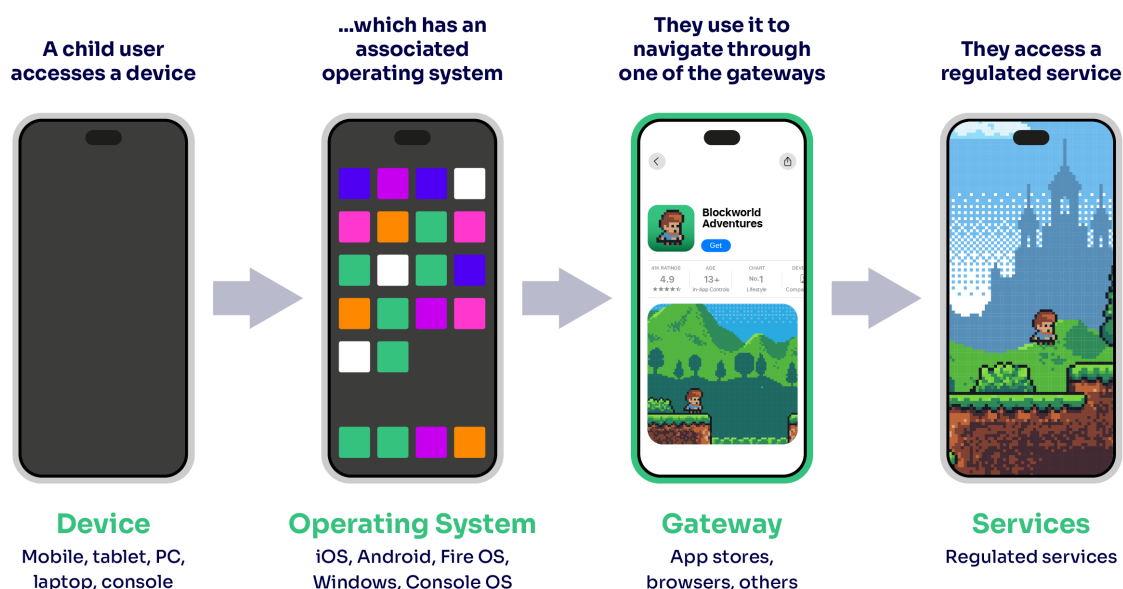
- 2.18 For the purposes of this report, app stores are digital distribution platforms that allow users to discover, download and access apps on their devices. They provide a platform for app developers<sup>9</sup> to make their apps available to users. App stores may perform a range of functions that support the distribution and use of apps, including app submission and review, app listing and age ratings, search and discovery, download and installation, parental controls, and reporting and enforcement. The functions performed by app stores, and the way they are performed, vary.
- 2.19 App stores form part of a wider ecosystem through which users can access regulated services. This ecosystem includes the device and operating system, as well as the different gateways available to them to access services. App stores are one example, with others

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<sup>9</sup> The individual or organisation responsible for operating and maintaining an app.

including web browsers, pre-installed apps, or sideloading.<sup>10</sup> The availability and significance of these gateways vary across devices and operating systems.

**Figure 1: app stores are one of several gateways through which children can reach regulated services**



## Distinguishing between regulated and unregulated apps and services

- 2.20 Apps are software products that users can download, install and use on their devices. App stores make a broad range of apps available. Where an app contains a regulated service, the Act refers to these as regulated apps.
- 2.21 Not all apps available through app stores are regulated services under the Act. For example, social media services may be regulated user-to-user services, whereas a banking app may sit outside the scope of the Act.<sup>11</sup> Similarly, some AI chatbots may be regulated user-to-user or search services, while others may not.<sup>12</sup>
- 2.22 Whether an app is regulated under the Act depends on the functionalities present on the service. For example, a game may include single player and multiplayer functionality. The multiplayer functionality may fall within scope as a user-to-user service where it enables users to generate content directly on the service, while the single-player functionality may not.

<sup>10</sup> Sideloading is the installation of applications through a distribution channel other than the app stores made available as part of the device or operating system. This may include alternative app stores and non-app store distribution channels such as direct downloads from websites, software providers, and file-sharing services.

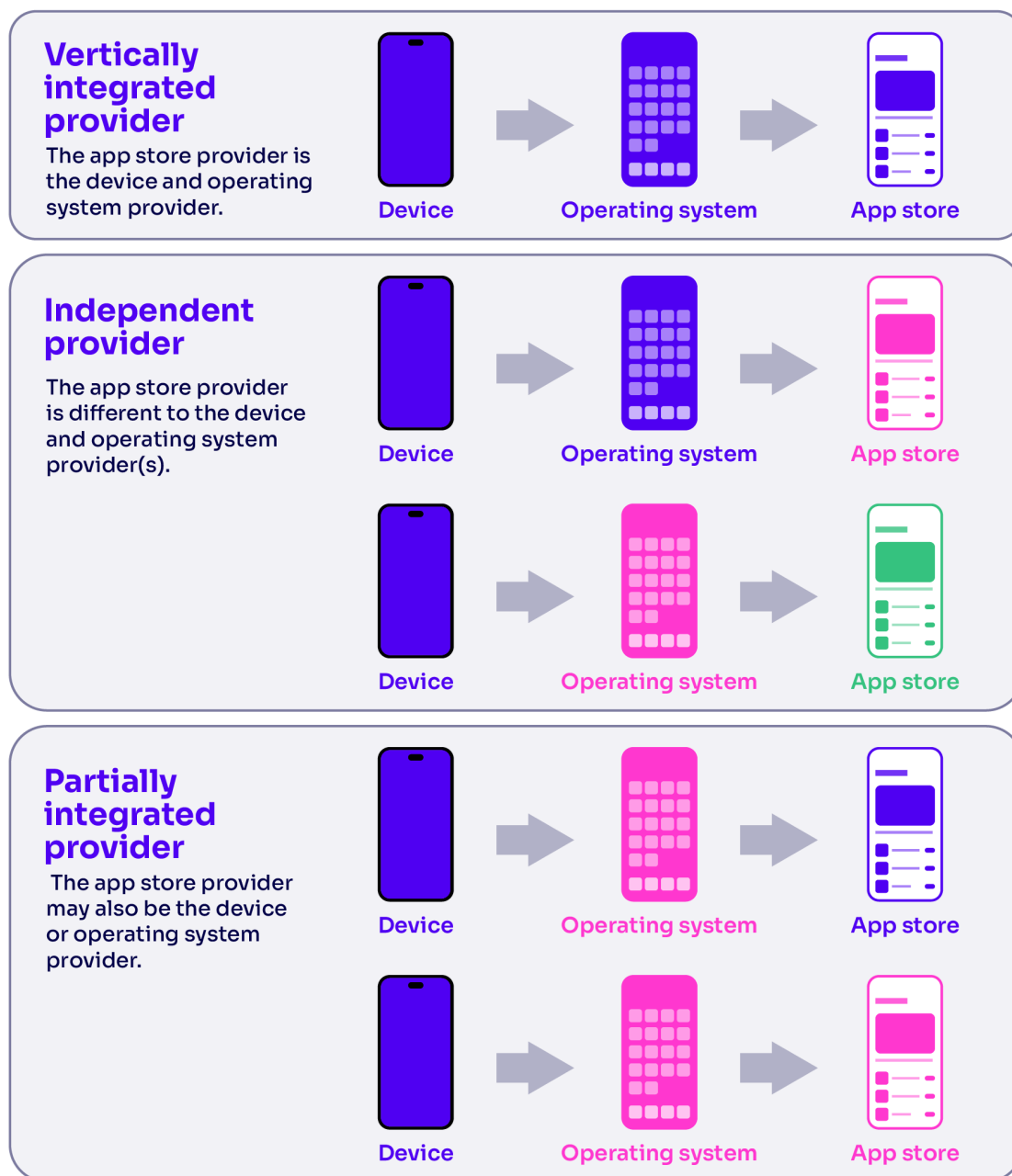
<sup>11</sup> Refer to our [Overview of regulated services](#) for more information.

<sup>12</sup> Ofcom, 2024. [Open letter to UK online service providers regarding Generative AI and chatbots](#).

## Types of app stores and how they operate

- 2.23 App stores vary according to the devices they serve, the types of apps they distribute and the way they operate. One way app stores can be categorised is by the type of device they support. These include:
- **Mobile app stores**, which make apps available for smartphones and tablets
  - **Desktop app stores**, which make apps available for desktop and laptop computers
  - **Console app stores**, which make apps, including games, available for games consoles
  - **Other connected devices**, such as smart TVs, extended reality devices and wearables
- 2.24 App stores can also vary according to the types of apps they distribute. Some app stores are general-purpose and distribute a broad range of apps, including social media, entertainment and gaming apps. Others are more specialised, focusing primarily on particular categories of apps, such as gaming services.
- 2.25 App stores also differ in how they are integrated into the wider ecosystem. Some app stores are operated by the same provider that controls the device and/or operating system (vertically integrated app stores). Others are independent of the device and/or operating system provider. Some devices and operating systems also allow users to access more than one app store, including those operated by third parties.

Figure 2: App stores vary in how they are integrated into the wider ecosystem



2.26 Research we commissioned identified a non-exhaustive list of 82 app stores available in the UK.<sup>13</sup> However, a relatively small number of app stores account for the vast majority of apps users download through app stores. These app stores are therefore particularly important gateways through which children may encounter regulated apps. Our recent survey found that 9 in 10 children in Great Britain who use app stores to download apps said that they used Apple App Store and Google Play Store most often on their main device.<sup>14</sup>

<sup>13</sup> [MTM London, 2026. App Store Technical Deep Dive.](#)

<sup>14</sup> For GB children who use app stores to download apps, 89% said that they most often used Apple App Store or Google Play Store on their main device. Source: [Ofcom, 2026. Children's Use of App Stores.](#)

## Interpreting this report

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- 2.27 The analysis in this report is based on evidence primarily gathered between November 2025 and August 2026. To produce this report, we have drawn from four main evidence sources, including:
- a) Our 2025 [Call for Evidence on age assurance and app stores](#) (our 2025 Call for Evidence) into the use of age assurance and app stores.<sup>15</sup>
  - b) Formal information notices issued to a sample of eight app store providers, in which we requested information about how they review apps and their protections for children.
  - c) Research into app stores and the wider digital ecosystem, involving desk research and avatar-style testing on a sample of app stores using child avatar accounts of different ages.<sup>16</sup>
  - d) An Ofcom survey with children aged between 8 and 17 and their parents where we asked about their experiences on app stores.<sup>17</sup>
- 2.28 We have also drawn on multiple additional research sources which explore children and parents' online experiences and attitudes: the Children's Online Safety Tracker (COST), Children's Passive Online Measurement (CPOM), and the Children and Parents' Media Literacy Tracker. Annex 1 sets out the detail and methodology of these in more detail.
- 2.29 This report primarily focuses its analysis on app stores operated by eight app store providers: Apple, Epic Games, Google, Microsoft, Nintendo, Samsung, Sony Interactive Network Europe (SIENE), and Valve. We used our statutory information gathering powers under the Act to issue information notices to these eight app store providers in January 2026. Throughout the report, we refer to this set of app stores as the "analysed app stores".
- 2.30 The analysed app stores provide coverage across the main device and operating system environments through which children may access regulated apps, considering their relevance to children, the availability of regulated apps and the evidence available to us about how they operate.
- 2.31 While we identify the app stores included in our analysis, we present findings in an aggregated or anonymised way. The exceptions are where referring to publicly available information and in our analysis of the most downloaded apps by accounts belonging to people under 18 in the UK. This reflects our focus on understanding the systems and processes used across app stores and the role they play in children's experiences, rather than assessing the performance of individual app store providers.
- 2.32 The analysed app stores do not represent all app stores available in the UK, many of which are many smaller, alternative or more specialised. In selecting the app stores for analysis, we also considered the relevance of device types to children's access to regulated services. We therefore did not include app stores primarily associated with devices such as smart TVs and wearables, as these provide more limited access to regulated services under the Act.

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<sup>15</sup> Ofcom, 2025. Call for Evidence on Age Assurance and App Stores.

<sup>16</sup> MTM London, 2026. App Store Technical Deep Dive.

<sup>17</sup> Ofcom, 2026. Children's Use of App Stores.

- 2.33 Further research considered three other app stores to provide a more complete picture of the wider app store landscape.<sup>18</sup> While these app stores are not the primary focus of this report, we draw on findings from this research where relevant.
- 2.34 App store providers may have introduced changes to their services, policies or protections since the evidence for this report was gathered. The report should therefore be read as an assessment of the evidence available at the time the research was undertaken.

## Report structure

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- 2.35 The remainder of this report is structured as follows:
- **Section 3** describes a representative child user journey through an app store
  - **Section 4** describes the child safety systems and processes on app stores
  - **Section 5** sets out our assessment of the role app stores play in children encountering harmful content and the extent to which age assurance is currently used and effective
  - **Section 6** explores whether children's online safety would be better protected through the greater use of age assurance, particular kinds of age assurance, or other measures
  - **Annex 1** sets out our methodology, including the evidence sources used in this report
  - **Annex 2** sets out our analysis of underage app downloads by children
  - **Annex 3** provides a glossary of terms used throughout the report

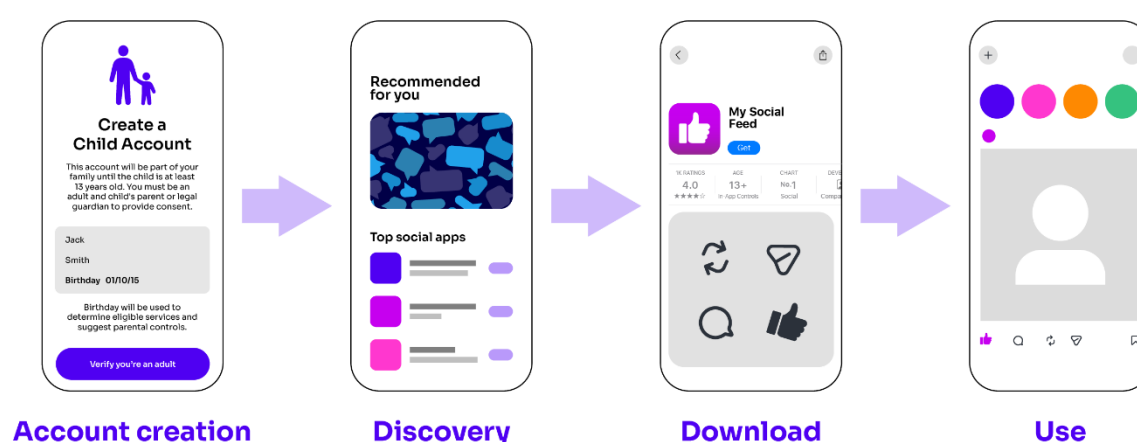
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<sup>18</sup> MTM London, 2026. App Store Technical Deep Dive.

# 3. Representative child user journey on an app store

- 3.1 In this section, we set out the representative child user journey, which broadly reflects the user journey of the analysed app stores to inform this report. While individual app stores may operate differently, this section highlights the common features and stages.
- 3.2 We focus on the four key stages of a child's journey on an app store, setting out at a high level what children see and do at each stage:

Figure 3: the four key stages of a child's journey on an app store



- **Account creation:** Children, or their parent or carer on their behalf, can create accounts on app stores.<sup>19</sup> Account creation is typically required before children can download apps, although some app stores may allow limited access to app store content without an account.
  - **Discovery:** the stage at which a child may encounter apps on app stores through browsing, searching, recommendations, rankings or other features. These features are often designed to promote apps that are popular, relevant or tailored to a user's engagement with the app store.
  - **Download:** the stage at which a user can download and install an app from the app store.
  - **Use of an app:** once an app has been downloaded, a child may be able to access and use the app, subject to additional user registration or access requirements that may be set by the app developer, such as age checks, age-based restrictions or parental controls applied within the app itself, or by other parties.
- 3.3 This report focuses on these four stages because they are the points in the child user journey where the analysed app stores were most likely to apply age-based protections for children, such as age gates<sup>20</sup> or parental controls.

<sup>19</sup> Accounts can be created during device or operating system setup, through an ecosystem account registration process, or directly within the app store itself.

<sup>20</sup> A point from which access should not be allowed unless a user provides an age result that meets specific defined criteria.

3.4 Figure 4 shows the four key stages in the child user journey and a non-exhaustive list of what the child can do alongside the systems and processes that app stores may operate behind the scenes at each stage.

**Figure 4: Representative child user journey through an app store and associated systems and processes**

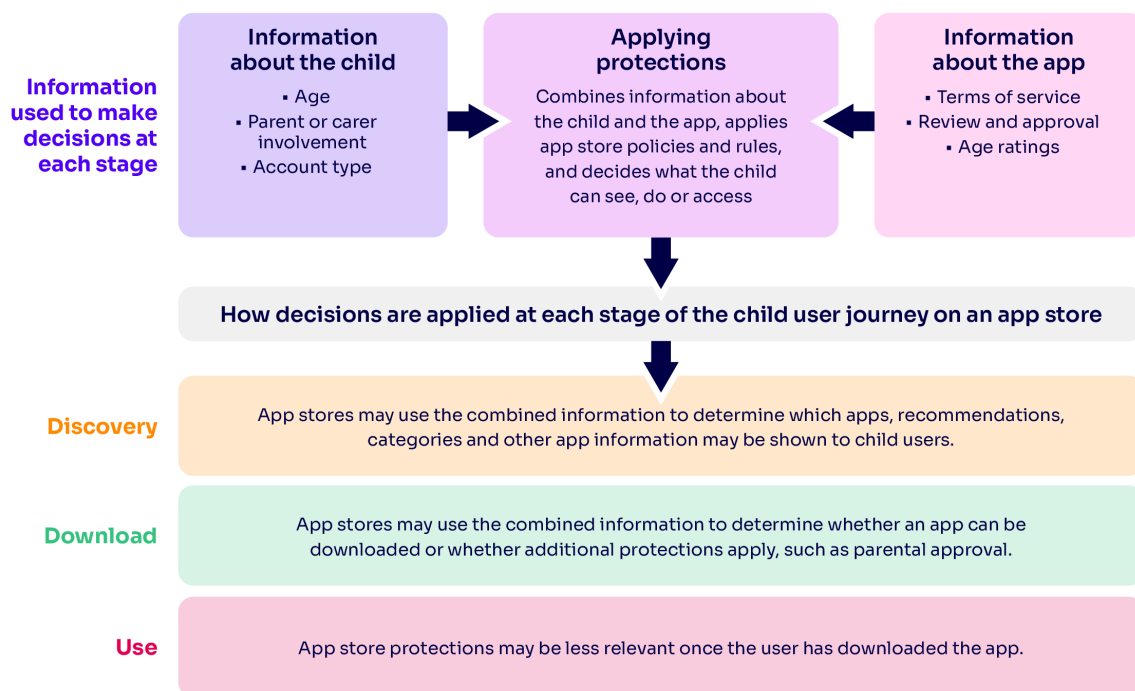
|                         | What the child does                                                                                                                                                                                                                                                            | Behind-the-scenes systems and processes                                                                                                                                                                                                                                                                                                             |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Account creation</b> | <ul style="list-style-type: none"> <li>Creates or logs into an account for the app store</li> <li>May provide their age or date of birth</li> <li>A parent or carer may be involved in setting up or managing the account through a supervised account<sup>21</sup></li> </ul> | <ul style="list-style-type: none"> <li>Information about the user's age is established</li> <li>Account settings, supervised accounts and parental controls may be established and linked to the child's account</li> </ul>                                                                                                                         |
| <b>Discovery</b>        | <ul style="list-style-type: none"> <li>Searches for apps, browses categories and views app listings</li> <li>May receive app recommendations or promoted apps</li> </ul>                                                                                                       | <ul style="list-style-type: none"> <li>Apps are reviewed and approved before being made available</li> <li>Age ratings help determine how apps are presented to children</li> <li>Search, ranking and recommendation systems shape which apps the child sees</li> <li>Age-based protections may further limit visibility of certain apps</li> </ul> |
| <b>Download</b>         | <ul style="list-style-type: none"> <li>Attempts to download or install an app on their device</li> <li>May be asked to confirm their age or obtain parental approval</li> </ul>                                                                                                | <ul style="list-style-type: none"> <li>Age-based protections determine whether the app can be downloaded</li> <li>Approval mechanisms may require a parent or carer to authorise download</li> </ul>                                                                                                                                                |
| <b>Use of an app</b>    | <ul style="list-style-type: none"> <li>Uses the app after downloading it</li> <li>May report problems or inappropriate content</li> </ul>                                                                                                                                      | <ul style="list-style-type: none"> <li>The app store may continue to monitor apps, receive user reports, and take enforcement action where its rules are breached</li> </ul>                                                                                                                                                                        |

<sup>21</sup> Where a parent account is linked to a supervised child account for the purposes of managing parental controls.

## 4. App store systems and processes

- 4.1 This section describes the representative child safety systems and processes across the analysed app stores, including approaches currently used to determine a user's age, assess apps and apply protections. Not every app store we analysed implements all these systems and processes, nor do they operate them in the same way.
- 4.2 App stores use information about both users and apps to determine what protections should apply throughout the child user journey. The systems and processes described in this section can be understood through three connected elements: information about the child, information about the app, and the protections applied by the app store. Information about the child, including their age, may be used to determine account structures and parental involvement. Information about the app provided by developers may be used to assess its suitability for different users. App stores can then use this information to apply protections at different stages of the user journey, including discovery, download and use.

**Figure 5: app stores use information about both users and apps to make decisions about the protections applied at different stages of the child user journey.**



### Information about the user

- 4.3 App stores may use information about the user, including their age, to determine which protections should apply to them.

## Age information

- 4.4 Age information is obtained when an account is created and may subsequently be used to determine account type and age-based protections that apply throughout the app store experience. This can involve self-declaration<sup>22</sup> or an age assurance process.
- 4.5 Where a user is found to be below a specified age, additional steps can be required to involve a parent or carer in the account creation process.

## Verifiable parental consent

- 4.6 While methods for obtaining verifiable parental consent vary, they typically involve a child self-declaring their age and providing an adult's email address.<sup>23</sup> The adult is then invited to undergo an age check themselves to prove they are an adult and is then invited to approve the child's self-declared age.
- 4.7 Currently, verifiable parental consent is deployed primarily as a means of obtaining parental consent for the purposes of processing data for users under 13 years old,<sup>24</sup> rather than to determine if a user is above or below a certain age. Where the app store relies on the adult self-declaring their age, this would not constitute verifiable parental consent.
- 4.8 For app stores, verifiable parental consent can be triggered where a user declares that they are below a specified age. The outcome of the adult's age check can then be used to establish the account structure applied to that user and subsequently give parents, carers or the assigned adult the option of using parental controls.
- 4.9 In our April 2025 Statement we said we were not aware that verifiable parental consent was being used as a form of age assurance and did not therefore include it in our guidance as a method that it is capable of being highly effective. However, we explained that in considering the potential applicability of verifiable parental consent as a method of age assurance, service providers need to be able to ensure that the email supplied by the child is indeed that of the child's parent or carer.<sup>25</sup>

## App store account structures

- 4.10 App stores can use age information, and where applicable the outcome of the VPC process, to assign users to different account structures. While the terminology may differ, account structures determine the level of autonomy afforded to a user, whether a parent, carer or assigned adult is involved in managing the account, and how parental controls apply throughout the app store journey.
- 4.11 The account structures observed across the analysed app stores for this report generally distinguish between child, teen and adult user accounts:
- **Child accounts** (under 13) are typically supervised through a linked parent, carer or assigned adult account.

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<sup>22</sup> Section 230(4) of the Act makes clear that requiring "a user to self-declare their age (without more)" is not to be regarded as a form of age assurance for the purposes of the Act.

<sup>23</sup> As verifiable parental consent does not verify the child's relationship with the parent or carer, all references to 'parental' involvement should be taken to mean the parent, carer or the assigned adult.

<sup>24</sup> This only applies where a service relies on consent as its lawful basis for processing a child's data.

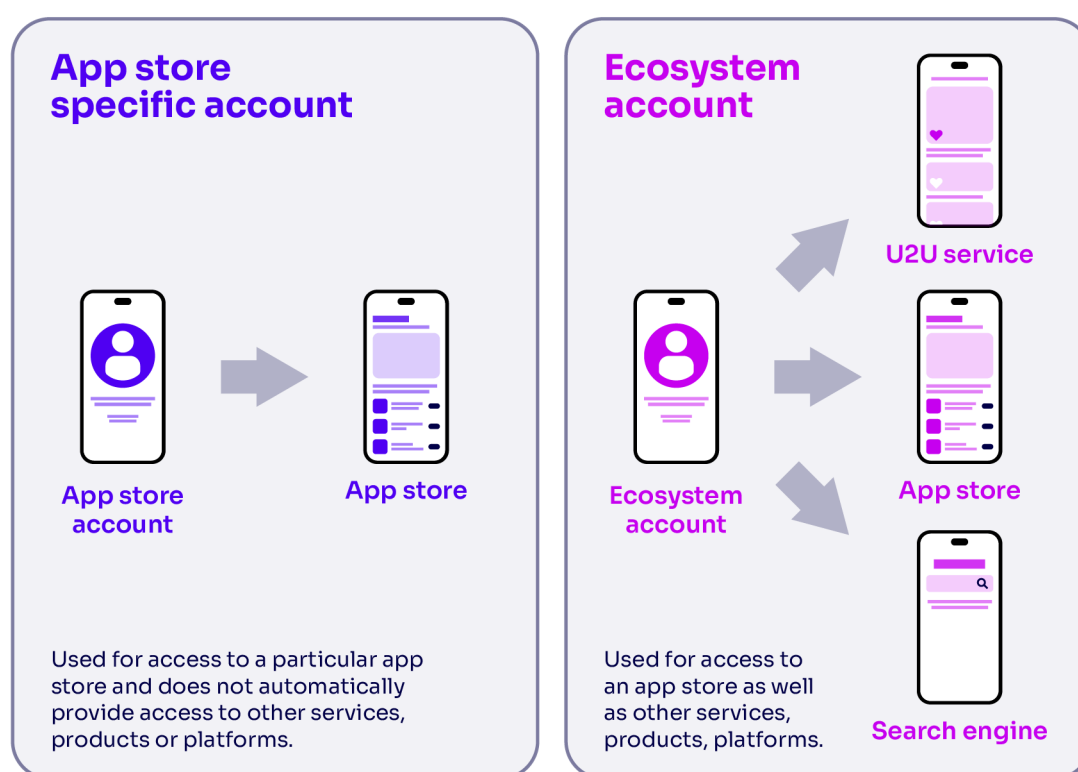
<sup>25</sup> Ofcom, 2025. April 2025 Statement on Protecting Children from Harms Online (April 2025 Statement), paragraphs 13.381 to 13.382.

- **Teen accounts** (ages 13 to 17) may also be supervised through a linked parent, carer or assigned adult account, although this is not always required.
- **Adult accounts** (18 and above) are managed by the user.

4.12 There are two broad account models used by app store providers:

- **App store-specific accounts:** used for access to a particular app store and does not automatically provide access to other services, products or platforms.
- **Ecosystem accounts:** used for access to an app store as well as other services, products, platforms.

**Figure 6: App stores use different types of account structures. Some app stores use accounts that are specific to the app store. Others form part of a wider ecosystem that provides access to multiple services**



## Information about the app

4.13 App stores can use information about apps to determine whether, how and to which users an app is made available on the app store. Typically, information about the app is obtained from app developers when an app is submitted for inclusion on an app store. App stores can assess this information against their terms of service as part of the review process and an age rating is assigned before the app is made available. Age ratings may be determined by the app store or a third party.

## Terms of service

4.14 App stores publish terms of service, policies or developer requirements that set out the standards that apps must meet to be made available, and remain available, through the app

store. These policies provide the framework against which apps can be assessed during the app review process.

- 4.15 Terms of service cover a broad range of issues relating to apps and app developers. They can prohibit certain categories of content or functionality, such as illegal content, gambling services, sexually explicit material, or deceptive and fraudulent practices, from being made available on the app store.<sup>26</sup>
- 4.16 Terms of service also establish requirements that app developers must meet, including requirements relating to app content and functionality, the information app developers are required to provide about their apps, and additional requirements for apps intended for children.
- 4.17 App stores may set requirements relating to the accuracy of information provided by developers during the age rating process in their developer terms of service. For example, app stores can prohibit developers from providing misleading or inaccurate information when completing age rating questionnaires or other app submission materials.

## Developer provided information

- 4.18 Before an app can be made available on an app store, app developers can be required to submit information about the app. This can include information about the app's content, functionality, intended audience and other characteristics relevant to the app store's requirements. App stores can require developers to provide this information through questionnaires, declarations or other forms as part of the app submission process.
- 4.19 The information provided by developers can then be used by app stores during the review process, as well as to assign an app age rating. During app review, app stores can assess the app, and information about the app provided by developers against their terms of service and other requirements. This assessment usually involves a combination of automated checks and human review of the app and the information provided by the developer.
- 4.20 Following review, app stores can decide whether an app can be made available through the app store, whether changes are required, or whether the app does not meet the app store's requirements.

## Age ratings

- 4.21 Age ratings are one of the primary mechanisms that app stores use to signal the suitability of apps for different age groups and to support age-based protections within the app store environment. They are typically assigned before an app is made available on an app store, using either an app store's own age rating system or a third-party system from a ratings body. For example, the Apple App Store<sup>27</sup> and Samsung Galaxy Store<sup>28</sup> use their own age rating systems. On the other hand, the Google Play Store, PlayStation Store, Nintendo eShop, Microsoft and Xbox Store and Epic Games Store use International Age Rating

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<sup>26</sup> MTM London, 2026. App Store Technical Deep Dive.

<sup>27</sup> Apple App Store, 2026. Available at: <https://developer.apple.com/help/app-store-connect/reference/app-information/age-ratings-values-and-definitions/> (accessed 23 October 2026)

<sup>28</sup> Samsung Galaxy Store, 2026. Available at: <https://seller.samsungapps.com/guidePopup.as?numcid=0202020000&localeLanguage=en&viewmore=0202020400> (accessed 23 October 2026)

Coalition (IARC),<sup>29</sup> a third-party system that enables app developers to obtain age ratings across multiple jurisdictions through a single rating process.

- 4.22 Under the IARC framework, developers complete a questionnaire about an app's content, features and functionalities. The responses are then used to generate age ratings under the age classification systems of participating ratings authorities. In the UK and most of Europe, IARC issues age ratings using the Pan-European Game Information (PEGI) classification system. As a result, apps distributed through participating app stores will receive PEGI age ratings such as PEGI 3, PEGI 7, PEGI 12, PEGI 16, or PEGI 18. Certain non-gaming apps may receive a Parental Guidance Recommended (PGR) rating rather than a numerical age-based rating. This is common for apps that host user-generated content or facilitate user-to-user interaction.<sup>30</sup>
- 4.23 There can be inconsistencies in the age rating of an app between app stores that use different age rating systems, but also sometimes between app stores that use the same age rating system. For example, WhatsApp is rated 13+ (may not be suitable for children under the age of 13) on the Apple App Store,<sup>31</sup> PEGI PGR (a warning that these apps can offer a broad variety of user generated or curated content) on the Google Play Store,<sup>32</sup> and PEGI 3 (suitable for all age groups) on the Microsoft Store.<sup>33</sup> WhatsApp has been given a different PEGI rating across two app stores despite using the same age rating classification system. As a result, parents and children may receive different indications of an app's suitability, and potentially face different restrictions on accessing an app, depending on the child's age and which app store is used.
- 4.24 Age ratings are distinct from a service's minimum age requirement. A service's minimum age requirement is the minimum age for a user to create an account or use the service, typically specified in its terms of service. By contrast, the age rating of an app on an app store is intended to indicate the age group for which an app is considered suitable based on the criteria and verification process established by a ratings body or app store. In some cases, a service's minimum age requirement may be different to an app store age rating. Neither of these are a signal as to whether an app or service is regulated under the Act.

## Applying protections

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- 4.25 App stores can use information about the user's age, together with information about apps, including the age rating, to apply age-based protections at different stages of the app store user journey. These protections can affect what child users encounter on the app store, and whether they are able to download certain apps. Once an app has been downloaded, the degree to which app stores can influence a user's experience may be more limited.
- **Discovery:** protections can be applied in different ways. For example, app stores can limit the appearance of particular apps in search results, browsing experiences, recommendations or promotional content based on an app's age ratings and a user's

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<sup>29</sup> IARC, 2026. Available at: <https://globalratings.com/> (accessed 23 October 2026)

<sup>30</sup> PEGI, 2026. Available at: <https://pegi.info/> (accessed 23 October 2026)

<sup>31</sup> Apple App Store, 2026. Available at: <https://apps.apple.com/us/app/whatsapp-messenger/id310633997> (accessed 23 October 2026)

<sup>32</sup> Google Play Store, 2026. Available at: [https://play.google.com/store/apps/details?id=com.whatsapp&hl=en\\_GB](https://play.google.com/store/apps/details?id=com.whatsapp&hl=en_GB) (23 October 2026)

<sup>33</sup> Microsoft Store, 2026. Available at: <https://apps.microsoft.com/detail/9nksqgp7f2nh?hl=en-GB&gl=GB> (accessed 23 October 2026)

age or account settings. They can also recommend or highlight apps that are considered more appropriate for the user. The extent to which these protections apply may depend on factors such as whether a user is signed in to an account.

- **Download:** protections can restrict whether a child user is able to download, install or purchase an app. For example, app stores can prevent child users from downloading apps that exceed the age rating applicable to their account or require approval from a parent, carer or assigned adult before a download can take place.
- **Use:** once an app has been downloaded, the app developer is generally responsible for the content and functionality available within the app. The app developer may apply additional age checks, restrictions or protections. App stores can also require them to implement specific reporting mechanisms for users, or they may reassess apps and age ratings following updates, user reports or suspected policy breaches. User reporting mechanisms may allow users to report concerns about apps to both the app developer and the app store; this can allow users to report where an app contains content that appears inconsistent with its age rating or otherwise breaches app store policies.

## Parental controls

- 4.26 Parental controls are tools that enable parents and carers to exercise control over the types of experiences their children have online. They can be applied through the account structures described in paragraph 4.11 and can restrict which apps a child can discover, download or purchase.
- 4.27 App store parental controls generally fall into two broad categories:
- **Discovery controls**, which can affect the apps a child user is able to view, browse, search for or be recommended on the app store; and
  - **Download and purchase controls**, which can restrict the download or purchase of apps on the app store, or require parental approval before these actions can take place.
- 4.28 Parental controls can be linked to age ratings or categories of apps. They can restrict access to apps by requiring parental approval for download, or limiting access based on information about the app such as age rating or app category.
- 4.29 The way parental controls apply is often determined by the type of account the user has. Child accounts may have parental controls applied automatically, while parental controls for teen accounts may require a parent, carer or assigned adult to actively set them up.
- 4.30 Section 3 and 4 set out the representative child user journey and the systems and processes used by the analysed app stores. This provides the context and analytical framework for the remainder of this report. In section 5, drawing on this understanding, we assess the role app stores play in children encountering harmful content by means of regulated apps, which app stores make available, and the extent to which protections, including age assurance, are currently used by app stores and how effective they are in practice.

## 5. How well do app store protections for children work?

- 5.1 This section considers the extent to which the analysed app stores provide access to the regulated services most frequently used by children and the significance of app stores as a gateway through which children encounter harmful content.
- 5.2 We then consider the extent to which analysed app stores currently use age assurance, and how effective those approaches are in practice. As app stores are not currently regulated services under the Act, they are not subject to children’s risk assessment duties or age assurance duties that apply to regulated services. In our assessment, we apply the ordinary meaning of “effective”, focusing on how well current approaches work in practice and whether they support the correct application of age-based protections, rather than whether they are “highly effective”<sup>34</sup> at determining whether a particular user is a child under the Act.
- 5.3 The application of age-based protections also depends on information about the app. We therefore assess the processes through which app stores assess and classify apps, namely terms of service, developer submitted information, app review processes and age ratings, as these inform the application of age-based protections. Finally, we consider the age-based protections available within app stores and assess how well they work in practice.

### App stores are a significant gateway to regulated apps where children may encounter harmful content

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- 5.4 Children make extensive use of apps. In our 2026 CPOM study, UK 8 to 14-year-olds using smartphones and/or tablets visited an average of 28 different apps in a month.<sup>35</sup> Many of the apps frequently used by children are regulated services. Among 8 to 14-year-olds, the most widely used apps included YouTube, WhatsApp, Roblox, Facebook, TikTok and Snap.<sup>36</sup> Recent survey evidence indicated that around three quarters (73%) of children aged 8 to 17 who said they downloaded apps from app stores on to a favoured device said they had done this at least once in the 4 weeks prior to research.<sup>37</sup>
- 5.5 The analysed app stores provide children access to many of these services. In 2025, across seven analysed app stores,<sup>38</sup> the ten most downloaded apps alone generated between 10 and 15 million downloads by under 18 accounts in the UK.<sup>39</sup> The total number of app downloads by children is likely to be substantially higher, as we expect many children have downloaded apps outside of the top ten most downloaded apps on each app store or used an over 18 account, neither of which are captured by this data. These downloads were

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<sup>34</sup> An age assurance process that is of such a kind and used in such a way that it is highly effective at correctly determining whether or not a particular user is a child (as in, whether they are under 18).

<sup>35</sup> Ofcom, 2026. Children’s Passive Online Measurement (CPOM) study.

<sup>36</sup> Ofcom, 2026. CPOM study.

<sup>37</sup> Among this group, 38% said they had tried to download an app (whether successful or not) two or three times during this four-week period. Source: Ofcom, 2026. Children’s Use of App Stores.

<sup>38</sup> [§<] did not provide this data in their response to our formal request for information issued 8 January 2026 since they do not collect it.

<sup>39</sup> [§<] Information received in response to our formal requests for information issued 8 January 2026.

heavily concentrated in the Apple App Store and Google Play Store, which accounted for almost 9 in 10 downloads across the seven analysed app stores.<sup>40</sup>

- 5.6 This demonstrates that app stores play a significant role in providing children access to regulated services in the UK. Many of the services most frequently used by children were made available through the analysed app stores, and several of these services are among the most downloaded by under 18 accounts.
- 5.7 The evidence we have links this access to children's exposure to harm. Our COST analysis found that 74% of 11 to 17-year-olds were exposed to harmful content over a four-week period on services that can be accessed through apps.<sup>41</sup> Several of these services are also among the most popular apps used and downloaded by children. We therefore consider that app stores are a significant gateway to regulated apps where children may encounter harmful content.
- 5.8 However, this does not imply responsibility or liability for harmful content encountered on those services. Further, app store providers are not regulated under the Act. Where an app is a regulated app, responsibility for protecting children from harmful content rests with that service provider.

## Web browsers provide an alternative gateway to many regulated services and are the main route to access porn

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- 5.9 Children can also access some regulated services through gateways other than app stores, including via web browsers. Where regulated services are available both through an app and through a web browser, our evidence suggests that children often access those services through apps. Among children aged 8 to 17 who go online, three quarters (75%) said they most commonly did this using apps that they downloaded from an app store, while two in ten (20%) said they most commonly used a web browser.<sup>42</sup>
- 5.10 The significance of child access via web browser may vary between services. Some services provide browser experiences that are broadly comparable to their app version, while others offer a reduced set of features and functionalities on the web version. The extent to which browser-based access provides a viable alternative may therefore depend on the design of the service itself. Other access gateways may also exist depending on the service and device, including sideloading, direct downloads and cloud gaming services.<sup>43</sup>
- 5.11 All general-purpose analysed app stores prohibited services whose primary purpose is to display pornographic content in their terms of service.<sup>44</sup> As such, children cannot ordinarily

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<sup>40</sup> Apple, Google responses to our formal requests for information issued 8 January 2026.

<sup>41</sup> Ofcom, October 2026. [Children's experiences of using online services](#)

<sup>42</sup> The remaining 5% either accessed apps in another way, did not remember, or did not know. Source: Ofcom, 2026. Children's Use of App Stores.

<sup>43</sup> MTM London, 2026. App Store Technical Deep Dive.

<sup>44</sup> See Apple App Store, App Review Guidelines (2026). Available at: [App Review Guidelines - Apple Developer](#); Google Play Store, Inappropriate Content - Play Console Help (2026). Available at: [Inappropriate Content - Play Console Help](#); Microsoft Store, Microsoft Store Policies (2026). Available at: [Microsoft Store Policies version 7.20 - Windows apps | Microsoft Learn](#); Samsung Galaxy Store, App Distribution Guide (2026). Available at: [App Distribution Guide | Samsung Developer](#) (all accessed: 23 October 2026).

access such services through app stores. Instead, web browsers represent the main gateway through which users access these services.<sup>45</sup>

- 5.12 This shows where app stores and web browsers play different roles in access to certain services. App stores play a significant role in enabling children access to many regulated services through which children may encounter harmful content, including social media, gaming, communications, livestreaming, and dating. Whereas web browsers may play a comparatively more important role in providing access to pornography services.

## Most analysed app stores do not currently use age assurance to determine the age of a user

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- 5.13 Through our assessment, we have seen that analysed app stores primarily rely on a user to honestly declare their age at account creation. All eight analysed app stores asked users to declare their age or date of birth during account creation.<sup>46</sup> This age information was the primary input used to determine whether parental consent was required, to assign users to account structures, and to determine the protections that apply to them. For app stores where no additional age checks were in place for users self-declaring as an adult, there is little incentive for children to self-declare an accurate age.
- 5.14 As the Act makes clear, self-declaration of age alone is not regarded as a form of age assurance under the Act, and available evidence tells us that it is not effective.<sup>47</sup> Ofcom's research highlights that 32% of 8 to 17-year-olds who go online said they had submitted a fake age online to access a new app or website.<sup>48</sup> MTM London's user journey testing found that, across app stores relying on self-declared age, a child who falsely claimed to be an adult was able to download an app with an 18 age rating. Restrictions on app downloads would have applied if the child had declared that they were under 18.<sup>49</sup>
- 5.15 Our evidence shows that app stores cannot effectively or reliably target protections at children where they primarily rely on a user self-declaring their age. Where analysed app stores rely on self-declared age information, age-based protections can only be applied to users who accurately report themselves as belonging to the relevant age group. Children under 13 who declare themselves to be adults, or to belong to an older child age group, are not placed in the correct child account and may not receive the available protections for their age.
- 5.16 Four analysed app stores required verifiable parental consent when the user declared they were under 13.<sup>50</sup> This involved an age check for the parent, carer or other adult to determine they are an adult. One other analysed app store also required parental involvement where a child declared they were under 13. The child account must be linked

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<sup>45</sup> Three quarters (75%) of those who have accessed pornographic content online before they were aged 16 or over did so on a free-to-access video-sharing site. Source: Ofcom, 2024. Barriers to proving age on adult sites.

<sup>46</sup> [3<] Information received in response to our formal requests for information issued 8 January 2026.

<sup>47</sup> Section 230(4) of the Act makes clear that requiring a user to self-declare their age (without more) is not to be regarded as a form of age assurance for the purposes of the Act.

<sup>48</sup> 32% of 8- to 17-year-olds who go online said that they had given a fake age online to gain access to a new app or to use a new site. Source: Ofcom, 2026. Children and Parents' Media Literacy Tracker. Children's User Age Wave 3 estimates that 34% of 8- to 12-year-olds with their own profile on at least one online service have a user age of at least 16 and over (YouGov). Source: Ofcom, 2026. p.12.

<sup>49</sup> MTM London, 2026. App Store Technical Deep Dive.

<sup>50</sup> [3<] Information received in response to our formal requests for information issued 8 January 2026.

to an existing account with an adult's declared date of birth.<sup>51</sup> For all five analysed app stores, these processes were dependent on the user first self-declaring as belonging to the relevant age group.

- 5.17 Further, none of the analysed app stores verified the relationship between the child and the adult. As discussed in section 4, at a minimum this relationship would need to be established with confidence for verifiable parental consent to be a reliable and robust means of determining the age of a child. Therefore, these processes did not mitigate the underlying reliance by the analysed app stores on self-declared age information to determine user age.
- 5.18 Two analysed app stores deployed additional steps aimed at determining whether a user is an adult in specific circumstances.
- One app store implemented age inference where a user declared they were over 18, based on information and activity associated with the user's account, including app store activity. Where this could not confidently establish that the user was over 18, the provider required additional age checks.<sup>52</sup> We have not included age inference in our non-exhaustive list of methods that we assess capable of being highly effective in our Part 3 HEAA guidance, and our age assurance report reinforced our longstanding concerns about the efficacy of age inference models.<sup>53</sup> The analysed app store also restricted access to "mature" content unless users completed an additional age check, such as a credit card check, ID verification, facial age estimation or email-based age estimation.<sup>54</sup>
  - Similarly, one app store required users to be logged into an active user account that had a valid credit card stored on the account in order to access "adult" apps. In both cases, the age check appears to be targeted at access to a specific category of apps, rather than determining a user's age to apply protections across the wider app store experience. While the checks may be recognised age assurance methods that are capable of being highly effective according to our Part 3 HEAA Guidance, its application is limited to age gating certain content rather than effectively and reliably targeting protections across the whole app store.<sup>55</sup>
- 5.19 Three analysed app stores deployed age assurance elsewhere within their wider ecosystems that did not appear to apply to their app store experiences.<sup>56</sup> These included restrictions on access to social and communications features and functionality within other services they provide beyond the app store. While age assurance may take place within a provider's broader ecosystem, it does not mean the result is available to, or used by, the app store or app developers. In the case of these three analysed app stores, the age assurance process implemented elsewhere in their ecosystem was not used to determine a user's age for the purpose of applying age-based protections within the app store.
- 5.20 Overall, most analysed app stores relied primarily on self-declared age information to determine a user's age. While some app stores took additional steps, these generally supplemented rather than replaced self-declaration. In addition, where age assurance was

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<sup>51</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>52</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>53</sup> Ofcom July 2026 Report on the Use of Age Assurance (July 2026 Age Assurance Report).

<sup>54</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>55</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>56</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

deployed elsewhere within a provider's wider ecosystem, the age data was not typically made available to or used by the app store. Consequently, app stores cannot effectively or reliably target age-based protections at children where they primarily rely on users self-declaring their age. To be more effective, age assurance would need to be used to target protections to child users at appropriate points in their app store experience.

## **App stores do not always have access to adequate information needed to determine app suitability and risk for children**

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### **Analysed app stores rely on developer provided information to identify and assess risks**

- 5.21 The analysed app stores use a combination of developer-provided information, automated review and human review when assessing apps before they are made available to the public.<sup>57</sup> These app stores reviewed and rejected a large number of apps, with Apple and Google reporting to have reviewed millions of apps globally in 2025.<sup>58</sup> Given the volume of app submissions and the breadth of issues considered during review, information provided by app developers appears to be an important input into app review processes. This information helps app stores or age rating bodies assess the suitability of apps and assign age ratings before an app is made available to users.
- 5.22 Our evidence is not clear on how many apps are rejected for containing harmful content or risky functionalities for children, as opposed to other reasons such as malware, technical bugs or illegal content. However, any protections that analysed app stores implement for children rely on the accuracy and completeness of information provided by app developers about the content, functionality, purpose, and sometimes the intended audience of their app. Six of the analysed app stores stated that every app submitted involved some human review, although the scope and depth of that review varied and was not always explained in detail.<sup>59</sup> Only two analysed app stores described additional requirements during the app review process for apps whose audience specifically includes children.<sup>60</sup> In our 2025 Call for Evidence on Age Assurance and App Stores (2025 Call for Evidence), one respondent raised concerns about the reliance app stores have on self-declared information by app developers to assign age ratings.<sup>61</sup> Taken together, evidence suggests app stores' ability to correctly identify the child safety risks on an app and apply age-based protections may be constrained where developer provided information is inaccurate or incomplete.

### **App stores seek to manage risks from user-generated content on apps by placing requirements on app developers**

- 5.23 Most analysed app stores recognised that there may be risks to children from user-generated content (UGC) and user-to-user interaction on apps in their app store terms of

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<sup>57</sup> [§] Information received in response to our formal requests for information issued 8 January 2026.

<sup>58</sup> 7,771,599 submissions were reviewed in 2024, including updates, with almost 25% rejected. Source: [§] response to our formal requests for information issued 8 January 2026; 1.75 million policy-violating apps were prevented from publication in 2025. Source: [§] response to our formal requests for information issued 8 January 2026.

<sup>59</sup> [§] Information received in response to our formal requests for information issued 8 January 2026.

<sup>60</sup> [§] Information received in response to our formal requests for information issued 8 January 2026.

<sup>61</sup> [§] response to our 2025 Call for Evidence on Age Assurance and App Stores (2025 Call for Evidence).

service. Six of the analysed app stores managed these risks through specific requirements for apps containing UGC or functionalities that enabled children to interact with other users. This included requiring that users have the ability to report UGC or block other users on the app and that app developers monitor and moderate UGC.<sup>62</sup> However, there are limits to how far the app review process can assess risk of harm from UGC, since this content may only materialise once an app is made available. Consequently, app stores can assess only the potential child safety risks from content or functionality before an app is made available.

- 5.24 The analysed app stores generally did not monitor apps continuously once they are made available to the public and the responsibility for risks arising from user interaction remains primarily with app developers. Only two analysed app stores proactively monitored apps once published, using automated systems and targeted human review, and the available evidence did not indicate exactly how they monitor for child safety risks.<sup>63</sup>
- 5.25 All eight analysed app stores reviewed apps when triggered by events such as app updates or user reports and indicated that they may review UGC when it is reported to them, but what this review process involves may vary depending on the app store.<sup>64</sup> In practice, given that app stores have limited visibility of in-app content, monitoring and moderating UGC on apps remains primarily the responsibility of providers of regulated apps. While user reporting to app stores may provide an additional route for harmful content on regulated apps to be identified reactively, its effectiveness is likely to depend on whether reporting mechanisms are clearly signposted, easily accessible and use to children, allow them to report relevant harms, and result in timely and appropriate remedial action. However, we do not have evidence on how app stores resource or operate these processes in a child-safety context.
- 5.26 Age ratings frameworks form a key part of how apps are classified and presented on app stores, as well as how age-based protections are applied. Our assessment suggests that current age ratings processes are designed to classify apps against predefined content and functionality criteria. As a result, apps that allow user-generated content or user interaction may not necessarily receive the appropriate age ratings to reflect the risk of harm to children that the app presents. While some app stores may supplement age ratings by signposting the presence of UGC or user interaction through labels, these indicators are typically informational.<sup>65</sup> This is significant because app stores commonly use age ratings as an input into discovery controls, download controls and other age-based protections for children.<sup>66</sup> Therefore, protections that rely on an app's age rating may not always be effective at protecting children from accessing apps that may expose them to harmful content.

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<sup>62</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>63</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>64</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>65</sup> MTM London, 2026. App Store Technical Deep Dive.

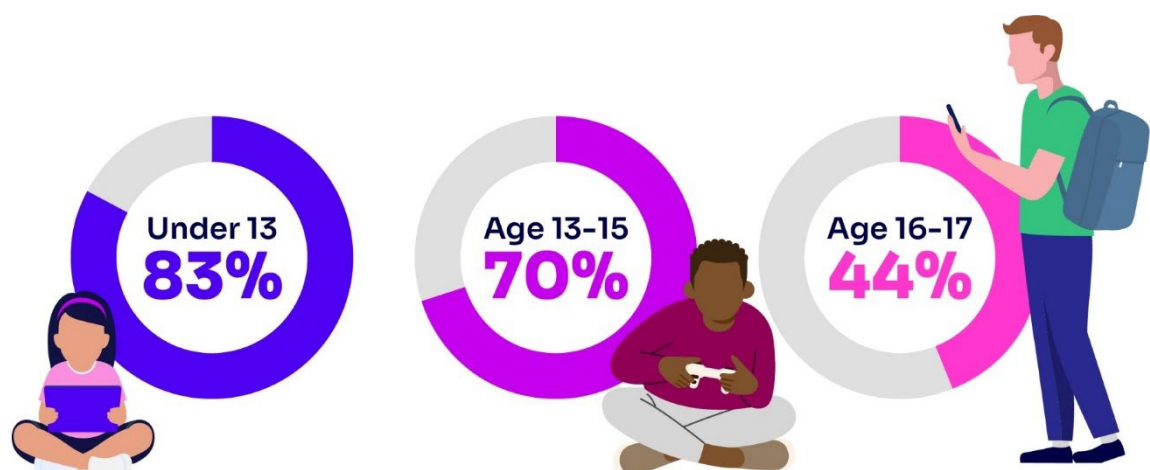
<sup>66</sup> MTM London, 2026. App Store Technical Deep Dive.

## Current protections for children depend on their age, the app store they use, and parental involvement

### Download controls are more likely to be applied to accounts belonging to children aged under 13

- 5.27 Download controls are more likely to apply automatically to children with accounts stating an age under 13 than to those aged 13 to 17. If a child declares themselves to be under 13 at account setup, parental controls which restrict app downloads were turned on by default for five analysed app stores, and parental or carer involvement was required.<sup>67</sup> For children aged 13 to 17, parents or carers were often required to take proactive steps to set up parental controls. Only two analysed app stores applied default download controls to children over 13.<sup>68</sup> For two analysed app stores, children with an account age of over 13 who were not supervised by a parent account could switch default download controls off without parental approval.<sup>69</sup> This shows that children may have very different experiences on app stores, and highlights the importance of determining children's ages accurately, particularly for children aged under 13.

**Figure 7: Percentage of parents of 8- to 17-year-olds with app download controls in place on at least one of their child's devices by age group**



- 5.28 Survey evidence indicated that two out of ten parents of 8- to 17-year-olds said they were unaware of app store download controls.<sup>70</sup> There was a notable difference in whether parents who were aware of parental controls to restrict the download of apps used them depending on their child's age (see figure 7). When app store protections are applied by default – generally for children under 13 – parents are more likely to be required to engage with parental controls at account setup when creating a supervised account which will increase their awareness of them. In our study, almost two-thirds (65%) of parents had a preference for default protections; four in ten (41%) said they would prefer default app store download controls for children of all ages and a quarter (24%) said they would prefer

<sup>67</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>68</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>69</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>70</sup> Ofcom, 2026. Children's Use of App Stores.

them for children under 13.<sup>71</sup> Applying download controls by default may reduce the burden on parents to actively set up these restrictions.

## Parents' understanding and use of age ratings and parental controls may limit their effectiveness in preventing underage downloads

- 5.29 Where parents, carers or other adults are required to set up and manage parental controls, they are often required to make judgements about app age ratings.<sup>72</sup> In our 2025 Call for Evidence, multiple stakeholders raised concerns that parental controls are complex, inconsistently configured and often misunderstood by families making them less effective.<sup>73</sup> Our 2026 survey found that a quarter of parents were either unaware of age ratings on app stores or were aware but did not find them useful. This indicates that the current age rating systems could be ineffective in supporting parents to make decisions.
- 5.30 The scale of underage downloads also suggests that age ratings are not a strong indicator of whether an app is appropriate for a child by parents. The data from the analysed app stores found that children download millions of apps rated higher than their account age in the UK in 2025.<sup>74</sup> Around a third of underage downloads were from accounts whose age is four or more years below the relevant app age rating.<sup>75</sup> We note that these download figures may not reflect the risk of children's exposure to harmful content.
- 5.31 In our survey, we asked children aged 11 to 17 who had been blocked from downloading an app at least once in the previous four weeks whether they found a way to bypass this block the last time this happened to them. Nearly three quarters of those who managed to find a way around being blocked the last time this happened to them said that their parent or carer approved the download or entered the password or PIN for them.<sup>76</sup> This highlights the significant role parents currently play in enabling children to access apps, and the important role app stores play in ensuring age ratings clearly and accurately communicate child safety risks to parents.

## Even with download controls, children may still be shown apps rated above their age and access them in other ways

- 5.32 We found significant variation in the apps children could discover across the app stores we analysed. One offered an age-neutral experience where children could search for or were recommended apps of any age rating, including apps rated 18 and over.<sup>77</sup> Six analysed app stores tailored the app discovery experience for children in different ways, for example, by blocking certain search results or recommendations of apps for children which had a higher age rating than their age, or removing editorial content for children.<sup>78</sup> One app store

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<sup>71</sup> Ofcom, 2026. Children's Use of App Stores.

<sup>72</sup> Ofcom, 2026. Children's Use of App Stores.

<sup>73</sup> [REDACTED], BILETA, Cliqstr responses to our 2025 Call for evidence.

<sup>74</sup> [REDACTED] Information received in response to our formal requests for information issued 8 January 2026. This data did not capture whether children's ages are accurate on their app store accounts or not. Where app stores relied on self-declaration, the figures may be higher. See Annex 2 for a more detailed analysis of these findings.

<sup>75</sup> [REDACTED] Information received in response to our formal requests for information issued 8 January 2026.

<sup>76</sup> Ofcom, 2026. Children's Use of App Stores.

<sup>77</sup> [REDACTED] Information received in response to our formal requests for information issued 8 January 2026.

<sup>78</sup> [REDACTED] Information received in response to our formal requests for information issued 8 January 2026.

offered access to that app store for logged-out users, allowing them to search for or be recommended apps of any age rating but not download them.<sup>79</sup> Three app stores only allowed logged-out users access on the web-based version of their app store.<sup>80</sup>

- 5.33 Where app discovery protections are in place, Ofcom commissioned research showed that children were still able to discover apps rated above their age through search. For example, Call of Duty (PEGI 18) was encountered by a five-year-old's account searching on the Microsoft store.<sup>81</sup> The research also showed apps rated above a user's age being recommended, one app store promoted the dating app Tinder (aged 17 and over)<sup>82</sup> as an 'essential' app to a 14-year-old's account.<sup>83</sup>
- 5.34 Even if children cannot subsequently download these apps due to age-based download controls, it may increase their awareness of apps that are not suitable for their age and encourage them to explore ways to circumvent restrictions. Our research shows that children attempted to bypass download controls in several ways. We asked children aged 11 to 17 who had been blocked from downloading an app at least once in the previous four weeks and then successfully got around the block, how they did so. Nearly three in ten (28%) said they did so the last time this happened to them by lying about their age, bypassing parental controls and/or attempting to download the app elsewhere.<sup>84</sup> As such, while download controls may limit access, children may still seek ways to circumvent those restrictions and promoting age-inappropriate apps to them may exacerbate this behaviour.

## App stores play a role in shaping children's online experiences, but protections vary and are not always effective

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- 5.35 Our findings suggest that app stores act as a significant gateway through which children access regulated user-to-user services, with a varied set of systems and processes that shape how children discover, download and access apps. Despite this, most analysed app stores do not currently use age assurance to determine a user's age or age range, instead they rely primarily on declared age information and parents being involved during the account creation process where verifiable parental consent is triggered. While some app stores deploy checks in specific circumstances or elsewhere within their wider ecosystem, these measures generally supplement rather than replace self-declaration as the primary means of determining age for the purposes of protections for children on app stores. As a result, our analysis suggests that app stores cannot effectively or reliably target age-based protections at children where they primarily rely on declared age.
- 5.36 More broadly, the effectiveness of app store protections depends on app stores having reliable information about both the user and the child safety risks associated with an app –

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<sup>79</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>80</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>81</sup> Microsoft autocompletes searches for 'Call of Duty' for child accounts. Source: MTM London, 2026. App Store Technical Deep Dive.

<sup>82</sup> Tinder was rated 17 and over at the time of testing; see the report methodology for more detail. Source: MTM London, 2026. App Store Technical Deep Dive.

<sup>83</sup> Apple promoted Tinder as an "iPhone essential" to a 14-year-old avatar account. This occurred during testing by MTM London using an avatar with an account age of 14 and may not necessarily be the experience of every 14-year-old user. Source: MTM London, 2026. App Store Technical Deep Dive.

<sup>84</sup> Ofcom, 2026. Children's Use of App Stores.

and consistently applying effective protections based on that information. App stores face challenges in obtaining and maintaining accurate information about apps at scale. These challenges arise in part from the practical difficulties inherent in assessing and classifying millions of apps, the dynamic nature of UGC, service-level features and functionality, and the fact that app stores often rely on information provided by developers.

- 5.37 App stores often provide stronger default protections for children under 13, while protections for 13 to 17-year-olds typically require a parent to set them up. Moreover, protections may not always be effective in practice. Even where they are enabled, children may still be able to discover or browse apps that are rated above their age. There is a need for protections to be appropriately designed and implemented. Age ratings and parental controls can provide additional protection, but the scale of underage downloads by children suggests their effectiveness depends on parents understanding what age ratings mean, recognising their relevance, and knowing how to enable and oversee parental controls.
- 5.38 This raises the question of whether children's online safety would be better protected through the greater use of age assurance, particular kinds of age assurance, or other measures by app store providers. We explore these considerations in the next section.

## 6. Exploring how app stores could better protect child safety

- 6.1 Leveraging the role of app stores as a gateway between apps and users could help to protect children from harmful content on the apps they make available.
- 6.2 In this section we explore whether children’s online safety would be better protected by the greater use of age assurance or particular kinds of age assurance by app store providers, or by other measures.<sup>85</sup> In line with section 161 of the Act and consistent with the rest of this report, this exploration focuses specifically on protecting children from content harmful to children, search content that is harmful to children and regulated provider pornographic content. It builds on our assessment of the role app stores play in children encountering these types of harm by means of regulated apps made available through app stores and our assessment of the current use and effectiveness of age assurance on app stores, as set out earlier in the report. This exploration may also have relevance in the context of the government’s proposed new age restrictions, including the ban on social media access for children under 16.
- 6.3 Our findings show that, given their position as a gateway, the analysed app stores already play a role in shaping children’s online experiences. This is done through a range of systems and processes, but they are inconsistently and ineffectively applied in the context of protecting children from harmful content. These include the collection and use of age information, app review and approval processes, age ratings, parental controls and developer governance arrangements.
- 6.4 As established in section 5, most analysed app stores do not currently use age assurance to determine a user’s age, instead relying primarily on self-declared age information at account creation. While some analysed app stores deployed additional steps in specific circumstances to determine whether a user is an adult, these processes generally supplemented rather than replaced self-declaration. This means that the effectiveness of the age-based protections depends on children correctly declaring their age, where there is little incentive to do so.
- 6.5 In this context, the use of highly effective age assurance could help to better target protection for children online. However, the use of age assurance by app stores will not, in itself, result in safer experiences for children online.
- 6.6 Better safety outcomes for children depend on three elements at an app store level:
- how accurately age is determined
  - relevant information of suitability and risk to children to support reliable app classification
  - whether age-based protections for children are correctly designed and implemented
- 6.7 The Act is clear that responsibility for protecting children from harmful content rests with regulated services. Protections on app stores may therefore complement service-level

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<sup>85</sup> Section 161(2)(c) of the Act.

protections in several ways, including by considering child safety risks of apps in their app store to ensure children only discover and download or access apps that have been appropriately rated as suitable for their age. However, existing app classification systems are not designed to assess all the child safety risks relevant to the Act.

- 6.8 The question of whether there should be any new regulation for providers of app stores, and what form it should take, are questions for the UK Government. Therefore, we have not made any specific recommendations on this. If the Government decides to explore potential new regulation using their powers in the Act to regulate app store providers, we would be happy to support them in designing any new framework.
- 6.9 This exploration is also not intended to represent our final view on other parts of the wider ecosystem and whether they can or should play a role in protecting children online.

## Potential approach to age assurance on app stores

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- 6.10 Any new regulatory duties on app store providers aimed at protecting them from harmful content, including preventing children from discovering or accessing certain apps, would depend on app stores being able to correctly determine which of their users are children. Age assurance would therefore be one element of a broader approach to applying protections to children on app stores.
- 6.11 In our Part 3 HEAA Guidance and Part 5 Guidance, we set out our approach to highly effective age assurance for certain regulated services, which is designed to be flexible, tech-neutral, and future-proof, setting out a consistent enforceable standard across the regime. App store providers could also use highly effective age assurance to correctly determine whether a user is over a certain age (for example, 18 or 16). The app store provider could then use this in two ways:
- a) to apply protections for children on the app store itself; and/or
  - b) make reliable age information available for regulated services to leverage to support them in determining whether a user is an adult or a child.
- 6.12 In principle, an app store could apply discovery controls to reduce exposure to apps rated above a child's age. This would likely require the use of a narrower set of age verification methods to determine a child's exact age or age range. This is not something currently covered in our existing HEAA guidance and would be more prescriptive than what providers of regulated apps are currently required to do under the Act (or would be required to do to enforce the expected new restrictions for children under 16).
- 6.13 Evidence suggests that device setup, account creation and associated supervised accounts can be important moments in a child's app store journey.<sup>86</sup> These points in the user journey may provide an opportunity to establish more reliable age information and apply age-based protections at an early stage. This information could then be used to support protections across the wider app store experience.
- 6.14 To support greater use of age assurance on app stores, the appropriate placement of both the age check (the point in the user journey at which a user completes a highly effective age check) and any age gate (the point from which access should not be allowed unless a user meets the age limit) would need to be carefully considered.

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<sup>86</sup> MTM London, 2026. App Store Technical Deep Dive.

- 6.15 App store providers, particularly those operating within vertically integrated ecosystems, may be well placed to make reliable age information available to regulated apps, enabling them to determine which users are children and apply the relevant protections. We note that some app store providers have already introduced mechanisms that allow an app developer to request a user's age range and whether their age is verified. These approaches could support regulated services in meeting their protection of children duties, while reducing friction for users. There may be value in the wider adoption of this approach, subject to several further considerations which we set out from paragraph 6.34.
- 6.16 Ofcom's existing HEAA guidance anticipates cases where age assurance takes place elsewhere in the ecosystem, including through third-party or wider system-level mechanisms, noting that it remains the responsibility of the regulated user-to-user service to ensure that age assurance is implemented in such a way that it is highly effective.<sup>87</sup> Therefore, the effectiveness of system-level age assurance and approaches to make reliable age information available to app developers would depend on the method(s) used and the overall age assurance process being highly effective, including robustness to circumvention, to ensure the accuracy of underlying age information. Its impact and value would also depend on factors including the availability and uptake by services, clear accountability and liability arrangements where services rely on age information provided by another actor.
- 6.17 However, an over reliance on app store age assurance presents limitations where children can access apps, content or services through alternative gateways (such as access via web browsers), use shared devices,<sup>88</sup> change account details, or encounter risks after the point of download. Any new regulatory model that considers imposing regulatory duties on app stores needs to build on the existing legislative framework without detracting from the responsibilities of regulated service providers to protect children on their services.

## Potential approach to relevant information about child safety risks on an app

- 6.18 Our report shows that app stores already use a range of processes to gather and assess information about apps, including terms of service, developer submissions, app review and age ratings. These processes help determine whether an app can be made available, how it is classified and how it may be presented to users.
- 6.19 Our evidence suggests that these processes are generally designed to assess compliance with app store policies at the point of review, rather than necessarily to address child safety considerations. As such, they may not fully assess dynamic or user-generated content, or high-risk features and functionalities for risk of harm to children.
- 6.20 To target age-based protections effectively, app stores would also need relevant, reliable information about the suitability and child safety risks associated with apps on their app store. App stores might need to know whether a regulated app is suitable for children of certain ages, whether it may expose users to harmful content, and what protections it has in place at a service level. Relevant information could include an app's intended audience,

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<sup>87</sup> Ofcom, 2025. Guidance on highly effective age assurance for Part 3 services (Part 3 HEAA Guidance), paragraph 3.5.

<sup>88</sup> Nine per cent of GB children aged 8 to 17 who downloaded apps via app stores and had indicated a primary device for this purpose said they shared their primary app-download device with an adult aged 18 or over, or with an older child. Source: Ofcom, 2026. Children's Use of App Stores.

the minimum age in its terms of service, the presence of high-risk features (such as livestreaming, and stranger communication), and the presence of content moderation, user reporting mechanisms and other protections.

- 6.21 In designing any future regulatory model, it may be necessary to review further whether existing age ratings and app review processes provide app stores with sufficient information to apply child safety protections consistently and effectively.

## Other measures to protect children on app stores

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- 6.22 There are other measures that app stores could apply to better protect children's online safety, specifically the application of download and discovery controls, both enabled by highly effective age assurance on app stores, and user reporting.

### Download controls

- 6.23 Download controls are applied by app stores to restrict the download or purchase of apps on the app store or require parental approval before these actions can take place. Our research shows that download controls are not being consistently applied to prevent children from downloading apps that may expose them to harmful content.
- 6.24 App stores could prevent the download of certain apps for children by applying an age gate.<sup>89</sup> To do this, they would need to have relevant and reliable information about the risks an app poses to children. They would also need a robust classification system to determine whether an app should be restricted for all children or children of certain ages. This includes a clear approach for identifying services that fall outside the scope of the Act. App stores would also require the use of a highly effective age check to apply an age gate.

### Discovery controls

- 6.25 Age-based discovery controls can affect the apps a child user is able to view, browse, search for or be recommended on the app store. These controls could complement download controls on app stores and service-level protections for children. App stores shape which apps children can view, search for, and be recommended. This might include editorially featured or curated content, algorithmic recommendations, paid promotion or advertising, and search functionality. As set out in section 5, we have seen some evidence that suggests younger children may be exposed to apps that have not been rated as suitable for their age.<sup>90</sup>
- 6.26 App stores may be able to use highly effective age assurance to block the search and discovery of all apps regulated by the Act rated above a child's age. They could also prevent apps rated above a child's age from appearing in editorially featured or curated content and app recommendations.
- 6.27 In addition to implementation considerations for download controls, implementing discovery protections effectively would raise several practical and policy challenges. It would likely require app store providers to precisely determine the ages of younger children – rather than establishing whether a user is a child – at a more granular form of age

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<sup>89</sup> A point from which access should not be allowed unless a user provides an age result that meets a defined criterion.

<sup>90</sup> MTM London, 2026. App Store Technical Deep Dive.

assurance than is currently required under the Act. Further consideration would be needed before such an approach could be implemented in practice.

## User reporting

- 6.28 The report has highlighted the challenges that app stores face around having relevant information about child safety risks on apps to determine whether an app is safe for children. To help address this, there may be a need for appropriate processes for users to report concerns about apps that may not be complying with app store policies, including where children are encountering harmful content on regulated apps.
- 6.29 The Act established user reporting and complaints duties on Part 3 services which allow users – including children – to make service providers aware of harmful content on their services.<sup>91</sup> Similar requirements on providers of app stores could help to make sure their processes are easy to use, find and access, increase transparency, and ensure they take appropriate action when users report harmful content.
- 6.30 However, user reporting is inherently a reactive measure and should be viewed as complementary to, rather than a substitute for, the primary responsibility of regulated services to identify and address harmful content. Additional reporting channels at the app store level could also create uncertainty for users about where concerns should be reported, potentially reducing the effectiveness of existing reporting mechanisms.

## Parental controls

- 6.31 Our report has shown that all analysed app stores offer parental controls which can help parents or carers to support the types of experiences their children have online.
- 6.32 The analysed app stores provide some capabilities to enable parents or carers to oversee, consent to and tailor protections for their children through supervised accounts, verifiable parental consent mechanisms and parental controls. These are not always consistent and easily accessible.
- 6.33 Parental controls and verifiable parental consent could complement measures to protect children from harmful content, including age-based protections. The role of verifiable parental consent may be strengthened where providers can verify a genuine parent or carer relationship with the child. However, to ensure that children are protected from harmful content, verifiable parental consent cannot act as a standalone protection but rather as a complement to other age-based access restrictions.

## Further considerations for any future regulatory intervention on app stores

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- 6.34 This report primarily focuses its analysis on app stores operated by eight app store providers. 9 in 10 children in Great Britain who use app stores to download apps said that they used Apple App Store and Google Play Store most often on their main device.<sup>92</sup> Nevertheless, app stores vary significantly in scale, business model, technical capability and position in the wider ecosystem. For example, vertically integrated app stores on mobiles

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<sup>91</sup> Sections 20 and 21 of the Act.

<sup>92</sup> For GB children who use app stores to download apps, 89% said that they most often used Apple App Store or Google Play Store on their main device. Source: Ofcom, 2026. Children's Use of App Stores.

may have particular capabilities because they are linked to devices, operating systems, account infrastructure, payment systems, parental controls and developer governance. Smaller or more specialist app stores may require a different approach to ensure proportionality.

6.35 Our exploration has been primarily focused on the potential child safety benefits of app stores playing a greater role in protecting children online, rather than regulatory design and delivery feasibility which was beyond the remit of this report.

6.36 There are several factors that would need to be taken into consideration in designing any potential new regulatory regime for app stores:

- **Scope, coverage and proportionality:** Which app stores should be expected to take measures, considering the diversity of app stores models and availability; and which apps within app stores should be subject to an age gate.
- **Relationship and interaction with service-level duties:** How app store protections interact with, and complement, existing duties and measures on regulated services.
- **Protection design:** What app stores should be expected to do in relation to different types of apps and services; where protections are applied; and how they should apply to apps that have already been installed or purchased.
- **App information and classification:** Whether existing age ratings are sufficient, what developer disclosures are needed, and how risky features are identified.
- **Governance, accountability and feasibility:** How responsibilities, governance and legal liability should be allocated between app stores, regulated services and other actors; who is responsible for age information, app information and protection decisions; how consistency and appeals are managed; and what is achievable within global app store processes.
- **Circumvention and alternative routes:** Considering circumvention by children as well as other legitimate gateways by which children access regulated services, including web browsers.
- **Impact on users:** how far user experience, freedom of expression on an app store may be impacted, including for adult users.
- **Data protection considerations:** Whether new measures may have implications for app stores' existing data protection obligations<sup>93</sup> and/or third parties (such as apps relying on app store age signals).
- **Competition and market dynamics:** Whether new measures may affect growth, investment and innovation. Whether there are implications for competition between app stores themselves or elsewhere in the ecosystem (for example, between apps operated by the app store provider and third-party apps, or between age assurance providers); this would include considering any interactions with the UK's Digital Markets Competition Regime.
- **Futureproofing:** How any regulatory approach remains adaptable as online safety policy, age limits, service types and risky functionalities evolve.

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<sup>93</sup> Refer to the ICO's [guidance for organisations](#) for more information.

# A1. Overview of methodology

- A1.1 To produce this report, we have drawn on a combination of evidence sources. This report primarily draws upon the analysis of app stores operated by eight app store providers, from information obtained through information notices: Apple, Epic Games, Google, Microsoft, Nintendo, Samsung, Sony Interactive Entertainment Network Europe (SIENE), and Valve. This is supplemented through three pieces of bespoke research: a technical research report commissioned through MTM London, a survey on parents and children's experiences of using app stores, and our dedicated 2025 Call for Evidence on Age Assurance and App Stores (2025 Call for Evidence). The report also draws on multiple other Ofcom research sources.
- A1.2 This report represents a point-in-time analysis of app stores based on evidence primarily gathered between November 2025 and May 2026. The fieldwork for the Children's Use of App Stores survey was completed in August 2026.

## Information from regulated services

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- A1.3 For this report, we used our statutory information gathering powers under the Act to issue information notices to eight app store providers. Throughout the report, we use the term 'analysed app stores' to refer to the overall sample.
- A1.4 These app stores do not represent all app stores available in the UK, which includes a range of smaller, alternative and specialised app stores. We selected these app stores to provide coverage across the main devices through which children may access regulated apps. In doing so, we considered the relevance of app stores to children, the availability of regulated apps, and the evidence available to us about how the app stores operate. We also considered the relevance of different device types to children's access to regulated services.
- A1.5 In our information notices, we gathered detailed information from app store providers on the systems and processes operating within their app store. This included information on account creation, age assurance, parental controls, app review and approval processes, age ratings, discovery and navigation functions, and terms of service for app developers.
- A1.6 For confidentiality reasons, we have redacted the names of app store providers where we have discussed the information they provided in response to the information notices. Where possible, we have presented this information in aggregated form.<sup>94</sup>

## MTM London: App Store Technical Deep Dive

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- A1.7 Ofcom commissioned independent technical research to support this report, [App Store Technical Deep Dive](#), aimed at understanding the role app stores play in children in the UK encountering content which is harmful to them on apps.

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<sup>94</sup> In redacting information and presenting it in aggregated form we have acted consistently with the requirements in section 393 of the Communications Act 2003 and section 164 of the Online Safety Act 2023 (the Act).

- A1.8 **Phase 1** focused on identifying, prioritising, and reviewing a subset of app stores available to child users in the UK. This consisted of four main steps:
- a) A taxonomy and prioritisation of app stores;
  - b) A deep dive into the features and policies for each prioritised app store;
  - c) User journey testing of the app store experience across different age groups of children; and,
  - d) An analysis of the app stores' metadata practices and any key differences between them.
- A1.9 **Phase 2** focused on mapping the broader digital ecosystem through which child users may access regulated services, the different types of actors involved, and the roles they play.
- A1.10 Fieldwork was conducted between November 2025 and January 2026.

## Ofcom research

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- A1.11 We have used additional qualitative and quantitative research studies to support our analysis on the use of app stores by children.

### The Children's Use of App Stores survey

- A1.12 The [Children's Use of App Stores survey](#) explored parents' awareness of and attitudes towards app store download controls. This includes parental controls that prevent a child from being able to download certain apps via an app store, or those which require parental approval. The survey also explored the experiences of UK children aged 8 to 17 who use app stores to download apps, including their responses if and when they are blocked from doing so.
- A1.13 Fieldwork was conducted in between 4 August 2026 and 18 August 2026. A sample of 2,052 children aged 8 to 17 and 2,052 parents were surveyed.

### Children's Online Safety Tracker (COST)

- A1.14 [Children's Online Safety Tracker](#) (COST) is designed to monitor the online experiences of UK children aged 8 to 17, including their awareness and use of online safety tools, and their recalled exposure to harmful content online.
- A1.15 Fieldwork was conducted between March and April 2026.

### Children's Passive Online Measurement (CPOM)

- A1.16 [Children's Passive Online Measurement](#) (CPOM) measures a UK-representative sample of 701 children aged 8 to 14 and uses passive monitoring technology to measure their visits to websites and apps across smartphones, tablets and computers. The study records both service reach and time spent, minimising the limitations associated with self-reported recall data.
- A1.17 The children's internet use was measured over a period of 28 consecutive days for each panellist, with fieldwork conducted between 9 October 2025 and 7 March 2026, which means that all results reflect usage patterns over that period, but are not necessarily representative of their use over a whole year.

## Children and Parents' Media Literacy Tracker

- A1.18 The [Children and Parents' Media Literacy Tracker](#) is a longstanding quantitative study which is currently run by BMG Research on behalf of Ofcom. The key objective of the survey is to provide robust research into the different elements of children's media literacy. The surveys provide data about children's media use, attitudes and understanding, as well as parents' views about their children's media use, and the ways parents seek to – or decide not to – monitor or limit use of different types of media. The survey covers children aged 6 months to 17 years old, although questions are only asked to children if they are age appropriate.
- A1.19 Fieldwork was conducted between November 2025 and February 2026.

# A2. Analysis of underage app downloads

## Introduction

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A2.1 This annex explains how we developed our analysis of app downloads made by under 18s whose age is below the app's age rating or service minimum age ('underage downloads') across seven analysed app stores.<sup>95</sup> It describes the dataset, sets out the methodology used to calculate underage downloads, presents the main findings, and discusses key limitations and caveats.

## Data characteristics

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- A2.2 The dataset used in our analysis covers the top 10 most downloaded apps by UK accounts belonging to children aged under 18 for each of seven app stores we analysed.<sup>96</sup> For each app store and each of these top 10 apps, we were provided the total number of downloads by UK users aged under 18 from December 2024 to December 2025, the app's age rating on the app store, as well as a breakdown of downloads by age group for users aged under 18.<sup>97</sup> The analysis is based on the age assigned to the account by the app store, rather than independently verified user age. The number of accounts recorded as being under 18 should therefore not be interpreted as equivalent to the number of child users.
- A2.3 This data was obtained via formal information notices to app stores, as explained in section 2, and unless stated otherwise all figures cited in this annex are derived from this dataset.
- A2.4 The dataset covers approximately 10 to 15 million downloads,<sup>98</sup> with Apple and Google accounting for almost 9 in 10 of these.<sup>99</sup> This includes all users aged under 18 whose age is explicitly identified in the dataset. Around half of all downloads in the dataset are from users aged under 13.<sup>100</sup>
- A2.5 The majority of downloads captured by the dataset are of regulated apps.

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<sup>95</sup> [X] did not provide this data in their response to our formal request for information issued 8 January 2026 since they do not collect it.

<sup>96</sup> The following app store providers were included in our analysis: Apple, Google, Nintendo, Epic Games, Microsoft, SIENE, and Samsung.

<sup>97</sup> The child download figures were broken down into the following categories: 0 to 5 years old, 6 to 9 years old, 10 to 12 years old, 13 to 15 years old and 16 to 17 years old. The only exception is [X], which does not allow users under the age of seven to make an account on their app store. As such, their lowest age category is technically 7 to 9 years old.

<sup>98</sup> [X] Information received in response to our formal requests for information issued 8 January 2026. [X] mentions that the top 10 app list provided is based on app acquisition rather than app downloads.

<sup>99</sup> Apple, Google responses to our formal requests for information issued 8 January 2026.

<sup>100</sup> [X] Information received in response to our formal requests for information issued 8 January 2026. The data generally does not capture any downloads by children who are using standard/adult accounts. [X] is the only exception, as they state their data contains downloads for child accounts as well as standard, unsupervised [X] accounts set up by users between 13 and 17 years old. These downloads are included in our analysis, but [X] did not provide a breakdown of downloads by account type, so we do not know how many there are of each type.

## Methodology

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- A2.6 To calculate the volume of underage downloads per app, we compared the number of downloads made by users aged under 18<sup>101</sup> within each age group for a given app against the relevant age rating for the app. We use two alternative approaches to determine this figure. We summed the downloads where the user age is below the app's age rating or service minimum age. We then aggregated these results across app stores to calculate the total volume of underage downloads among each app store's top 10 apps.
- A2.7 As discussed previously, downloads are split by age bands. This means that where an app's age rating or service minimum age falls within one of these bands, we cannot identify the precise volume of underage downloads. For instance, where an app has an age rating or service minimum age of 13 years, any download made by users in the age bands of 0 to 5 years, 6 to 9 years and 10 to 12 years would be considered underage. However, if an app has a rating of 7 years, for instance, we are unable to determine the number of underage accounts in age band 6 to 9 years, as the age rating or service minimum age sits within the band. In such cases, we take a conservative approach and only include downloads from age bands that are entirely below the app's age rating or service minimum age. In the example in this paragraph, if the age rating of an app is 7, then the number of underage downloads would be equal to the number of users aged 0 to 5 years.
- A2.8 We observed some discrepancies between the age ratings certain apps received on the app store and the minimum age stated in the app's terms of service. In some cases, the minimum age stated in an app's terms of service is lower than the age rating displayed on the app store; in others, it is higher. This means the choice of using an app's age rating or the service minimum age can materially affect whether a download is counted as underage.
- A2.9 We therefore developed two approaches to try and calculate underage downloads:

### Approach 1: App store age rating

- A2.10 This uses the age rating reported by the app store. It shows how many children are downloading apps below the age rating displayed by that store.
- A2.11 Apps rated 'Pan-European Game Information (PEGI) – Parental Guidance Recommended'<sup>102</sup> are excluded, as they do not provide a numerical age rating. This means that a large share of one app store's downloads is excluded from this part of the analysis.<sup>103</sup> Apps rated PEGI 3 or 'all ages' are treated as having no minimum age.

### Approach 2: Terms of service or PEGI rating

- A2.12 This uses the minimum age stated in the app's own terms of service, where available.
- A2.13 This allows us to apply the same approach to apps regardless of app store and include download data for apps labelled 'PEGI – Parental Guidance Recommended', where these

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<sup>101</sup> Our analysis is based on the number of accounts identified as belonging to child users. This is distinct from child users as a whole, which would include adult accounts used by children and may result in a higher volume of users.

<sup>102</sup> PEGI (Pan European Game Information) provides age classifications for video games and some non-game apps.

<sup>103</sup> [3<] Information received in response to our formal request for information issued 8 January 2026.

apps define a minimum age in their terms of service. In some cases, an app store's age rating differs from the app's minimum age in the terms of service, which also drives some of the different results for Approach 2.

- A2.14 However, we observed that gaming apps often do not state a minimum age in their terms of service. In such cases, we use the PEGI rating instead. We also note that the minimum ages reported in an app's terms of service may not always be equivalent to standard content suitability ratings, as discussed in section 4.

## Interpreting this data

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- A2.15 In this section we set out the main caveats and limitations of the findings.
- A2.16 We note that the data collected from app stores only consisted of downloads of their top 10 most popular apps. The total number of app downloads by children is likely to be substantially higher, as we expect many children have downloaded apps outside of the top ten most downloaded apps on each app store or used an over 18 account, neither of which are captured by this data.
- A2.17 The data does not show whether underage downloads were approved by parents using parental controls. App stores' current application of parental controls for approval of downloads is discussed in section 5.
- A2.18 The data does not capture downloads by child users who use a standard or adult account.<sup>104</sup> As such, it is likely that the actual number of underage downloads by child users may be significantly higher than we have calculated.
- A2.19 We note that these download figures may not reflect the risk of children's exposure to harmful content. The data does not show what happened after the download was initiated. For instance, it does not capture if the user went on to use the app, whether they were prevented from doing so by age assurance measures within the app, and whether they encountered any harmful content.
- A2.20 As touched upon earlier in this annex, downloads are reported in age bands, which means our underage download figures only include age groups that fall entirely below the relevant age rating. This means our analysis is likely to understate underage downloads where an age rating falls within an age band.

## Results

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- A2.21 This section presents the key findings from our analysis, including the total volumes of downloads by users aged under 18, the volume of underage downloads and the age profile of affected accounts.<sup>105</sup> The data points in this section have been presented in bracketed ranges to avoid potentially revealing commercially sensitive information.

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<sup>104</sup> There were between 10 and 15 million total downloads. We removed around 3 million of these from the analysis on the basis that these accounts were not confirmed as belonging to child users.

<sup>105</sup> The ranges reported in tables in this section are rounded independently and as such do not sum to 100%.

**Table 1: Share of child-account downloads by age group**<sup>106</sup>

| Age group (years) | Total downloads |
|-------------------|-----------------|
| 0 to 5            | [0 to 10%]      |
| 6 to 9            | [10 to 20%]     |
| 10 to 12          | [25 to 35%]     |
| 13 to 15          | [30 to 40%]     |
| 16 to 17          | [15 to 25%]     |

- A2.22 As shown in table 1, a significant proportion of child-account downloads [45 to 65%] are attributable to accounts with an age of 13 and over.
- A2.23 The top five most popular apps downloaded by accounts with an age under 18 represents just under half of all child downloads across the analysed app stores.<sup>107</sup>
- A2.24 A significant share of downloads by accounts with an age under 18 are underage downloads. The specific share depends on which age approach is used: We assess there to be [1.5 to 2.5 million] underage downloads under Approach 1 (using app store age ratings), and [2 to 3 million] downloads under Approach 2 (based on app terms of service or PEGI). As such, we calculate that roughly [10 to 20%] of all downloads of top 10 apps by accounts with an age under 18 to be underage downloads under Approach 1, and [15 to 25%] under Approach 2.
- A2.25 We also found that most underage downloads relate to regulated apps.<sup>108</sup> Under Approach 1, we calculate that around [70 to 80%] of underage downloads relate to likely regulated apps. Under Approach 2, we calculate approximately [90 to 100%] of underage downloads relate to likely regulated apps.<sup>109</sup> The large difference in the volume of underage downloads between approaches is due to the inclusion of one app store's downloads under Approach 2, as well as the fact that a significantly higher proportion of underage downloads on this app store relate to likely regulated apps.<sup>110</sup>

**Table 2: Underage downloads of an app stores top 10 most popular apps by age group**

| Age group (years) | Underage downloads (Approach 1) | Underage downloads (Approach 2) |
|-------------------|---------------------------------|---------------------------------|
| 0 to 5            | [0 to 10%]                      | [0 to 10%]                      |
| 6 to 9            | [20 to 30%]                     | [20 to 30%]                     |
| 10 to 12          | [60 to 70%]                     | [60 to 70%]                     |
| 13 to 15          | [0 to 1%]                       | [0 to 1%]                       |

<sup>106</sup> Our analysis does not include downloads from [X] for users aged 0-5 years old, as the minimum age to register for a [X] account is 7 years old.

<sup>107</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>108</sup> Most downloads in our dataset relate to user-to-user or search services in scope of the Online Safety Act 2023 (the Act), and as such would be considered regulated apps. In limited cases where it was not immediately clear whether an app was a regulated service, we took a conservative approach and did not include such apps within our working definition of likely regulated apps.

<sup>109</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

<sup>110</sup> [X] Information received in response to our formal requests for information issued 8 January 2026.

|       |        |        |
|-------|--------|--------|
| 16-17 | [0-1%] | [0-1%] |
|-------|--------|--------|

A2.26 As shown in table 2, the majority of underage downloads are made by accounts with an age of 6 to 12 years, irrespective of analytical approach. We also note that [0 to 2%] of underage downloads are made by accounts with an age of 13 and over, which is not surprising given that most apps within the dataset have an age rating of 13 or under. <sup>111</sup>

**Table 3: Underage downloads of an app stores top 10 most popular apps** <sup>112</sup>

| <b>A2.27</b> | <b>Distance from age rating or service minimum age (years)</b> | <b>Underage downloads (Approach 1)</b> | <b>Underage downloads (Approach 2)</b> |
|--------------|----------------------------------------------------------------|----------------------------------------|----------------------------------------|
|              | At least two                                                   | [30 to 40%]                            | [25 to 35%]                            |
|              | At least four                                                  | [30 to 40%]                            | [25 to 35%]                            |
|              | At least eight                                                 | [0 to 10%]                             | [0 to 10%]                             |

A2.28 A meaningful share of underage downloads also relates to accounts that are substantially below the relevant age rating or service minimum age. Under Approach 1, we calculate that [30 to 40%] of underage downloads are from accounts four or more years below the relevant age rating (for example, apps with an age rating of 13 downloaded by accounts with an age of 9 or under). Likewise, under Approach 2 we find that [25 to 35%] of underage downloads are from accounts four or more years below the relevant age rating or service minimum age. <sup>113</sup> Overall, our findings did not meaningfully differ based on the analytical approach used.

<sup>111</sup> [§] Information received in response to our formal requests for information issued 8 January 2026.

<sup>112</sup> These categories are cumulative rather than mutually exclusive. As the number of downloads between two and four years below the relevant age rating or service minimum age is relatively small as a share of total underage downloads, the rounded ranges for “at least two years below” and “at least four years below” are the same.

<sup>113</sup> [§] Information received in response to our formal requests for information issued 8 January 2026.

## A3. Glossary

| Abbreviation, word or phrase      | Meaning for the purpose of this report                                                                                                                                                                                      |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Act                           | <a href="#">The Online Safety Act 2023.</a>                                                                                                                                                                                 |
| Accounts for a user aged under 18 | This can include both child and teen accounts                                                                                                                                                                               |
| Adult account                     | Adult accounts (18 and above) are managed by the user.                                                                                                                                                                      |
| Age assurance (AA)                | A collective term for age verification and age estimation as defined in section 230 of the Act                                                                                                                              |
| Age assurance method              | The system or technology that underpins an age assurance process.                                                                                                                                                           |
| Age assurance process             | The end-to-end process through which the age assurance method or combination of methods are implemented to determine the age or age range of a user.                                                                        |
| Age-based protections             | A collective term for restrictions applied to users under 18 by an app store based on a user's age.                                                                                                                         |
| Age check                         | An individual instance of an age assurance process being applied to a user.                                                                                                                                                 |
| Age estimation                    | Any measure designed to estimate the age or age range of users of a regulated service. <sup>114</sup>                                                                                                                       |
| Age gate                          | A point from which access should not be allowed unless a user provides an age result that meets specific defined criteria.                                                                                                  |
| Age inference                     | A broad class of estimation techniques that typically analyses user behavioural data and/or user interactions with content or functionalities on services, often referred to as "signals", to determine age. <sup>115</sup> |
| Age information                   | Any age information that the app store holds on the user                                                                                                                                                                    |
| App listing                       | The page in an app store that displays information about an app                                                                                                                                                             |
| Age ratings                       | A standardised classification that indicates the minimum recommended age for an app based on its content and features, to help users judge suitability. Standards are                                                       |

<sup>114</sup> Section 230(3) of the Online Safety Act 2023 (the Act).

<sup>115</sup> See 'Age inference models' in our January 2025 Age Assurance and Children's Access Statement (January 2025 Statement).

|                              |                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | typically set by a regional ratings authority such as Pan-European Game Information (PEGI) or by the app store.                                                                                                                                                                                                                                                                                                |
| App submission               | The process through which an app developer submits an app and related information to an app store for assessment, review, classification, and approval prior to publication.                                                                                                                                                                                                                                   |
| Age verification             | Any measure designed to verify the exact age of users of a regulated service. <sup>116</sup>                                                                                                                                                                                                                                                                                                                   |
| App                          | Apps are software products that users can download, install and use on their devices.                                                                                                                                                                                                                                                                                                                          |
| App developer                | The individual or organisation responsible for operating, maintaining, and creating an app.                                                                                                                                                                                                                                                                                                                    |
| App store                    | App stores are digital distribution platforms that allow users to discover, download and access apps on their devices.                                                                                                                                                                                                                                                                                         |
| App store-specific account   | A user account that is used for access to a particular app store and does not automatically provide access to other services, products or platforms.                                                                                                                                                                                                                                                           |
| Call for Evidence (CfE)      | Online safety regulation: Statutory reports on age assurance and app stores, published 3 November 2025                                                                                                                                                                                                                                                                                                         |
| Circumvention                | Deliberate actions taken by a user to obtain access to an age restricted service, functionality, or content, for which they do not meet the applicable age requirement. This can be done in a number of ways including: (a) bypass or attempt to bypass the age gate all together, such as by using a virtual private network (VPN); (b) misrepresenting their age; or (c) using another person's credentials. |
| Child account                | Child accounts (under 13) are typically supervised through a linked parent, carer or assigned adult account.                                                                                                                                                                                                                                                                                                   |
| Children's Access Assessment | A process that all Part 3 services in scope of the Act must carry out to determine whether they are likely to be accessed by children.                                                                                                                                                                                                                                                                         |
| Content harmful to children  | a) Primary priority content (PPC); <sup>117</sup><br>b) Priority content (PC); <sup>118</sup> and                                                                                                                                                                                                                                                                                                              |

<sup>116</sup> Section 230(2) of the Act.

<sup>117</sup> Defined in section 61 of the Act.

<sup>118</sup> Defined in section 62 of the Act.

|                                       |                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       | c) Other content which presents a material risk of significant harm to an appreciable number of children in the UK, referred to as ‘non-designated content that is harmful to children’ (NDC). <sup>119</sup>                                                                                                                                                           |
| Device                                | A physical piece of hardware on which software including apps, can be installed, accessed or used. Devices may include smartphones, tablets, computers, smart TVs, games consoles and wearable devices.                                                                                                                                                                 |
| Ecosystem account                     | A user account that is used for access to an app store as well as other services, products, platforms.                                                                                                                                                                                                                                                                  |
| Facial age estimation                 | An age estimation method that works by analysing the features of a user’s face to estimate their age.                                                                                                                                                                                                                                                                   |
| Highly effective age assurance (HEAA) | An age assurance process that is of such a kind and used in such a way that it is highly effective at correctly determining whether or not a particular user is a child.                                                                                                                                                                                                |
| Information notice                    | A formal request issued by Ofcom requiring a service provider to supply specified information.                                                                                                                                                                                                                                                                          |
| Ofcom                                 | The Office of Communications, known as Ofcom, is the UK’s independent regulator for online safety under the Act. Ofcom has statutory responsibilities under the Act to regulate certain internet services. For more information about Ofcom, see: <a href="https://www.ofcom.org.uk/about-ofcom/what-is-ofcom">https://www.ofcom.org.uk/about-ofcom/what-is-ofcom</a> . |
| Operating system                      | The operating system is the core software that manages a device’s hardware and software resources and provides the environment in which applications and services operate.                                                                                                                                                                                              |
| Parent or carer account               | An account of a user aged 18 and above, that has been designated as a parent or carer and linked to a child account on an app store.                                                                                                                                                                                                                                    |
| Parental controls                     | Parental controls are tools which enable a parent or carer to exercise control over the types of experiences children are having online, including within an app store.                                                                                                                                                                                                 |
| Protection of Children Code           | Ofcom’s Code of Practice which sets out measures that services can take to comply with their duties to protect children under the Act.                                                                                                                                                                                                                                  |
| Ratings body                          | An organisation or rating authority that establishes and/or administers an age rating framework for classifying apps, games or other digital content.                                                                                                                                                                                                                   |

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<sup>119</sup> Section 60(2) of the Act.

|                             |                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regulated apps              | Apps that contain a user-to-user service, search service, and/or provide pornographic content as regulated by the Online Safety Act.                                                                                                                                                                                                      |
| Sideloading                 | Sideloading is the installation of applications through a distribution channel other than the app stores made available as part of the device or operating system. This may include alternative app stores and non-app store distribution channels such as direct downloads from websites, software providers, and file-sharing services. |
| Teen account                | Teen accounts (ages 13 to 17) may also be supervised through a linked parent, carer or assigned adult account, although this is not always required.                                                                                                                                                                                      |
| User generated content      | In relation to a user-to-user service means content (a) that is (i) generated directly on the service by a user of the service, or (ii) uploaded to or shared on the service by a user of the service; and (b) that may be encountered by another user, or other users, of the service by means of the service.                           |
| Verifiable parental consent | While methods for obtaining verifiable parental consent vary, they typically involve a child self-declaring their age and providing an adult's email address. The adult is then invited to undergo an age check themselves to prove they are an adult and is then invited to approve the child's self-declared age.                       |