



TO: Ofcom

FROM: [Common Sense Media](#)

DATE: 1 December 2025

RE: [Call for Evidence](#): Statutory Reports on Age Assurance & App Stores

CONFIDENTIALITY:

Per Ofcom's consultation response form, the whole response below is not confidential. Responses may be attributed to Common Sense Media.

Point of contact: Holly Grosshans, Senior Counsel, Tech Policy

RESPONSE:

Common Sense Media is dedicated to improving the lives of kids and families by providing the trustworthy information, education, and independent voice they need to thrive. Our ratings, research, and resources reach more than 150 million users worldwide and 1.4 million educators every year. Backed by the research that's the foundation of everything we do, we champion quality media that entertains and inspires, and support legislation that aims to close the digital divide and hold social media and AI platforms accountable for their effects on minors. We encourage students and educators to think critically about technology and become responsible digital citizens. And we support children's health and well-being by advocating to protect their data privacy and guard them from online harms.

We are pleased to submit these comments in response to Call for Evidence: Statutory Reports on Age Assurance & App Stores.

What role do app stores play in children encountering harmful content, and would children's safety be better protected by greater use of age assurance, particular forms of age assurance, or other measures at the app-store level?

Common Sense Media commends Ofcom for its leadership in advancing accountability for how online platforms impact children. Ofcom's focus on addressing a wide range of online harms and its recognition that upstream interventions are a necessary part of solutions to

reduce continued risk represent a meaningful step toward a safer digital ecosystem. Common Sense believes app stores can play a key role in protecting children online. Common Sense also believes that apps themselves, as well as all internet ecosystem players, can and must also protect children online.

Children routinely gain access to apps and online environments that expose them to harmful content, including pornography, violent content, sexualised chat, manipulative design features, and unmoderated user-generated content. Although the harmful content is encountered *within* the apps themselves, app stores can serve as a principal gateway. App stores typically have age recommendations or ratings, but these are not routinely enforced, and it is easy for children to bypass gates that simply require entering a birthdate. App age and content ratings can determine app visibility and interact with parental controls. It's unclear how much these ratings can be relied upon, however. App stores have been criticized for inadequate review policies of apps.¹ For example, a legal complaint brought by 5Rights and the Good Law Project alleges that app-store ratings systematically understate risk, with popular apps given store age ratings lower than the minimum ages in their own terms and privacy policies.² Further, even when apps are appropriately designated, it is unclear what meaningful safeguards are in place to prevent children from accessing age-inappropriate apps for them. According to research conducted by Common Sense Media and University of Michigan Medical School, 68% of children under 13 access "teen"-rated apps, and almost 45% of 11-17 year olds used apps with mature (17+) or adult (18+) ratings, including pornography sites, Reddit, casino games, and violent games like Call of Duty.³ Within apps, children can find addictive algorithmic recommendation loops, sexualised contact opportunities, self-harm content, and the algorithmic amplification of risky material.

As currently implemented, rating systems cannot be relied upon for child safety. In addition, at least one survey has shown that parents want age checks and protections to be applied at the point of app download.⁴ It is no wonder then that lawmakers are considering and passing requirements that would require app stores to implement stronger age checks,⁵ or that app stores themselves are introducing ways to signal age to developers.⁶ For example, California's AB 1043 (2024) requires operating systems and app stores to implement an age-bracket signaling mechanism at account setup and pass that signal to apps upon download.⁷

At the same time, app developers who create problematic and risky apps in the first place, or who mislabel or rate their apps, also bear responsibility for protecting children. And

¹<https://techcrunch.com/2019/05/29/following-ftc-complaint-google-rolls-out-new-policies-around-kids-apps-on-google-play/>

²<https://www.thetimes.com/article/034f0648-1cbd-4697-9ba6-107f54233bb2>.

³ https://www.common sense media.org/sites/default/files/research/report/2023-cs-smartphone-research-report_final-for-web.pdf.

⁴ https://cdn.prod.website-files.com/5f47b99bcd1b0e76b7a78b88/636d0df804bd2d7c849f4e50_MAKING%20SENSE%20OF%20AGE%20ASSURANCE%20EXEC%20SUMMARY%20-%20FOSI%202022.PDF.

⁵ See, e.g., Texas, <https://legiscan.com/TX/text/SB2420/id/3237346>, Utah <https://le.utah.gov/~2025/bills/static/SB0142.html>.

⁶ See, e.g., <https://www.apple.com/newsroom/2025/06/apple-expands-tools-to-help-parents-protect-kids-and-teens-online>.

⁷ Cal. Assemb. B. 1043, 2023–2024 Leg., Reg. Sess. (Cal. 2024).

apps are not the only places children are online—they are also on websites (and perhaps more likely to go on such other places if apps are more restricted)—so protections are needed there too. Protections need to be put in place not only in app stores but in apps themselves, in websites, and via devices and operating systems. Indeed, California’s AB 1043 has obligations for developers as well, and also for operating systems.⁸ And states like New York are currently promulgating rules to support age assurance to be conducted by social media sites and apps with addictive feeds.⁹ All of these measures will help protect children better online.

Overall, a multifaceted approach to age assurance, that includes the point of download as well as beyond that, would help to reduce children’s exposure to online harms.

ABOUT COMMON SENSE MEDIA UK:

Common Sense Media is an independent nonprofit organisation dedicated to helping children thrive in a rapidly changing world. The organisation is based in San Francisco, California with regional offices across the U.S. Common Sense launched its first international office in the UK in 2019, a registered charity (also Common Sense Media, 1188840), through which it rates, educates, investigates, and advocates for the safety, privacy, and well-being of children in the UK and globally.

For more information, visit <https://www.commonsense.org/> and <https://www.commonsensemedia.org.uk>

⁸ Cal. Assemb. B. 1043,.

⁹<https://ag.ny.gov/press-release/2025/attorney-general-james-releases-proposed-rules-safe-kids-act-restrict-addictive>