# Executive Recommendations

We welcome Ofcom's call for evidence on the use and effectiveness of age assurance in relation to children's access to online content and app stores. Our submission concentrates mainly on **Section B**, the role that app stores play in regulating harmful content for children. Our submission is informed by our research which addresses gambling-like content and simulated gambling in games, which should be considered a form of "non-designated content" for minors. We draw on empirical findings from our two studies:

Study 1 examines **the top 31 bestselling mobile games on the Apple App Store and Google Play Store**, evaluating **the coherence and reliability of age classification systems across major mobile platforms**.[1]

Study 2 examines **how the top 100-grossing mobile games on the Australian Apple App Store and Google Play comply with Australia's new age classification law**,[2] evaluating **how well the platforms implement and enforce these age-classification rules**.[3]

We submit this evidence to highlight problems in mainstream app stores' age-classification systems and to outline ways to make age-based classification frameworks more effective. Although our study was conducted in the Australian context, the findings reveal structural issues in app-store age labelling and metadata governance that are **highly relevant to Ofcom's duties** under the Online Safety Act, particularly regarding:

- the accuracy and reliability of age-related information relied upon for age assurance;
- how children encounter applications whose classification suggests material risk of harm; and
- the role of app stores in enabling or undermining risk-based protections for children.

Based on our findings, we recommend:

- Harmonisation of Age Rating: All platforms should display a single, authoritative age rating per jurisdiction, based on the highest applicable threshold across all relevant documents.
- Transparency and Enforcement: Age-gating mechanisms should be standardised and subject to an independent audit to ensure compliance with stated policies.
- Regulatory Oversight: National regulators should mandate clearer disclosure requirements for platforms, active monitoring of compliance, and explore international cooperation to reduce cross-jurisdictional inconsistencies.

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[1] Study 1, "One Game, Four Age Ratings: Documenting the Incoherence of Mobile Game Age Classifications", https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5542780

[2] Australia's Guidelines for the Classification of Computer Games https://www.legislation.gov.au/F2023L01424/asmade/text

[3] Study 2, "Investigating mobile games' compliance with Australia's 2024 mandatory minimum age classifications scheme for gambling-like mechanics", https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5543999

# Multiple Age Ratings for One Game

Study 1 analysed the age-rating practices for the top 31 highest-grossing mobile games across the Apple App Store and Google Play Store. We sampled the top 25 games from each platform on September 4th, 2025, and because many titles appeared on both lists, the final sample comprised 31 unique games. For each game, we collected its age rating from six different sources:

- the age rating shown in the Apple App Store,
- the age listed in the Apple app description,
- the age rating shown in Google Play,
- the age listed in the Google Play app description,
- the game's privacy policy, and
- its terms of service.

Across these sources, we found major inconsistencies in how age information is presented:

- **58%** of games (18 out of 31) had **four** different age ratings
- **23%** of games (7 out of 31) had **three** different age ratings
- **16%** of games (5 out of 31) had **two** different age ratings
- **Only 3%** of games (1 out of 31) had a single, **consistent** age rating

These inconsistencies suggest that app stores do not provide reliable or coherent age guidance for users, particularly for children and their caregivers. Therefore, we recommend a harmonisation of age rating, where platforms should display a single, authoritative age rating per jurisdiction, based on the highest applicable threshold across all relevant documents. This would make it much easier for children and parents to know whether a game is appropriate, reducing confusion caused by different ratings in different parts of the app or store.

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# Age-gating is Symbolic

In Study 1, we sampled 15 of the highest-earning games on the Australian iOS App Store and played them directly to see whether they included any age-checking features, and how players, particularly children, would actually experience these features. Each game was played for two minutes, and the screen was recorded, based on our view that players should be given clear age information as soon as the game starts. When age information was requested, we entered 12, as US law places strict limits on how companies can collect personal data from children under 13.[4]

- **46%** (7 out of 15) of the games offered **no age-checking** features during installation or within the first two minutes of play.
- **27%** of the games (4 out of 15) referred to age but **did not ask** players to enter or confirm their actual age.

[4] the 1998 Children's Online Privacy Protection Act (COPPA) https://www.ftc.gov/legal-library/browse/rules/childrens-online-privacy-protection-rule-coppa

- **27%** of the games (4 out of 15) asked players to enter their ages. However, in **75%** of these cases (3 out of 4), the games were officially rated for players older than 12, yet children could still play them **in violation of the stated age rules** by simply entering "12" as their age.
- **Only 1** out of 15 games had a working age-check system that actually blocked players who were under the required age.

Overall, our findings show that age-gating in top-grossing Australian iOS games is largely inconsistent and often ineffective — a situation that is likely similar in the UK, given that many of the same games are available there. To address these issues, we recommend that age-gating mechanisms be standardised and subject to independent audits. Standardisation would ensure that all games apply consistent and reliable age checks, while independent audits would provide external verification that these systems are functioning as intended, giving regulators and parents greater confidence that age restrictions are genuinely enforced.

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# Platforms' Compliance Is Poor

In Study 2, we sampled the 100 top-grossing games from the Australian Apple App Store and Google Play separately on 10 February 2025. Due to overlaps between the two stores, this resulted in a total of 115 unique games. All games were downloaded and played for up to one hour to determine whether any new content would affect their age classification under Australian law.

Our findings revealed generally poor compliance across both stores:

- **20.4%** (20 out of 98)[5] of games in the Apple App Store **did not comply** with Australia's age classification law.
- **48.9%** (48 out of 98) of games in the Google Play **did not comply** with Australia's age classification law.

Furthermore, the Apple App Store displayed age ratings according to its own system, which, in our study, did not align with the requirements of Australian law. However, Apple is capable of complying with local regulations, as it has done in countries such as South Korea and Brazil. Building on this, we recommend that national regulators should mandate clearer disclosure requirements for platforms, employ active monitoring of compliance, and explore international cooperation to reduce cross-jurisdictional inconsistencies. These steps would make age ratings more reliable across app stores, help regulators enforce protections, make it easier for parents to know what's appropriate, and better protect children from unsuitable content.

One additional issue that emerged in this research that we wish to highlight in our submission is that presently, if a game changes its rating users are not notified. For example, if a user downloads a game rated 4+ and this game later changes its rating to 18+ (for example, due to the addition of simulated gambling content or changing legislation) the user who downloaded

[5] We excluded 2 games from the top 100 due to the scope of our study.

it when it was rated 4+ is not notified. This capability is easily afforded by digital platforms, and could improve parent capabilities of protecting young users.

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# Conclusion

Our findings show that app stores currently present substantial inconsistencies in age labels, with some titles exhibiting up to four different age ratings across pages and metadata fields. Compliance with age-classification laws is also generally poor. These inconsistencies undermine the effectiveness of age assurance, impair parental decision-making, and prevent platforms from accurately assessing risk under frameworks such as the Online Safety Act.

We recommend that Ofcom provide more explicit guidance to app stores on their responsibilities, emphasising that platforms themselves have a critical duty to protect children. Clear, consistent, and enforceable age-rating requirements would help app stores meet their obligations, support parents in making informed choices, and enable regulators to monitor and enforce compliance more effectively.

We would be pleased to provide the full dataset, screenshots archive, and methodological documentation upon request.

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# About Authors

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