

8 October 2025

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Google LLC

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Dear Rachel

## Preliminary view on whether Google services are age-restricted social media platforms

1. I refer to our recent engagement concerning the social media minimum age obligation (**SMMA obligation**) in Part 4A of the *Online Safety Act 2021* (Cth) (**the Act**). As you are aware, the SMMA obligation comes into effect on 10 December 2025 and applies to ‘age-restricted social media platforms’.
2. As the eSafety Commissioner, I am required to monitor and promote compliance with the Act, including the SMMA obligation. To assist industry and the public to prepare for the SMMA obligation, eSafety is engaging with services and encouraging them to assess whether they are an age-restricted social media platform using our [self-assessment tool](#). We are also separately assessing whether services are age-restricted social media platforms.<sup>1</sup>
3. The purpose of this letter is to:
  - a. notify you that eSafety has recently conducted an assessment of the following services: YouTube, YouTube Kids, and Google Classroom (**the Google services**);
  - b. notify you that eSafety has formed the preliminary view that:
    - i. each of the Google services is a separate electronic service for the purposes of assessing whether it is an age-restricted social media platform under s 63C of the Act;

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<sup>1</sup> In the absence of any rules made by the Minister specifying a service as either an age-restricted social media platform or not an age-restricted social platform under ss 63C(4) and 63C(6)(b) of the Act respectively, any determination that a service is or is not an age-restricted social media platform is a matter for the court.

- ii. YouTube is an age-restricted social media platform; and
- iii. YouTube Kids and Google Classroom are not age-restricted social media platforms;
- c. notify you that eSafety will be publicly communicating our preliminary view today; and
- d. give Google the opportunity to respond to our preliminary view and provide any submissions which may be relevant to our final assessment of the Google services before the SMMA obligation comes into effect.

## Summary of preliminary view

- 4. After conducting a preliminary assessment of the Google services, eSafety has formed the preliminary view that:
  - a. YouTube is an age-restricted social media platform for the following reasons:
    - i. the conditions for an age-restricted social media platform in s 63C(1) and s 63C(6)(a) of the Act have been met; and
    - ii. YouTube does not fall within one or more of the classes of services that are excluded from the SMMA obligation under the *Online Safety (Age-Restricted Social Media Platforms) Rules 2025 (the Rules)* (s 63C(6)(b) of the Act).
  - b. YouTube Kids is not an age-restricted social media platform because the conditions for an age-restricted social media platform in s 63C(1) of the Act have not been met.
- 5. Google Classroom is not an age-restricted social media platform because, whilst the conditions for an age-restricted social media platform in s 63C(1) and s 63C(6)(a) of the Act have been met, Google Classroom falls within one or more of the classes of services that are excluded from the SMMA obligation under the Rules, specifically rule 5(1)(c) (services that have the sole or primary purpose of supporting the education of end-users).

## Material taken into account

- 6. In forming our preliminary view, eSafety has taken into account the following material:
  - a. relevant provisions in the Act and Rules
  - b. eSafety's Regulatory Guidance and self-assessment tool



- c. internal eSafety user testing of the Google services
- d. information on Google's websites, media releases and public communications
- e. insights from relevant research or third-party reports, and other publicly available information
- f. how the Google services are described in the Apple App Store and Google Play Store
- g. Google's communications with eSafety.

## Reasons for preliminary view: YouTube

7. An electronic service is an age-restricted social media platform if the following conditions are satisfied:
- a. the sole purpose, or a significant purpose, of the service is to enable online social interaction between two or more end-users (s 63C(1)(a)(i)), and
  - b. the service allows end-users to link to, or interact with, other end-users (s 63C(1)(a)(ii)), and
  - c. the service allows end-users to post material on the service (s 63C(1)(a)(iii)), and
  - d. material on the service is accessible to, or delivered to, end-users in Australia (s 63C(6)(a)), and
  - e. the service is not an excluded service under the Rules (s 63C(6)(b)).

### YouTube is an electronic service

8. An 'electronic service' is defined in s 5 of the Act as:
- (a) a service that allows end-users to access material using a carriage service; or
  - (b) a service that delivers material to persons having equipment appropriate for receiving that material, where the delivery of the service is by means of a carriage service;
- but does not include:
- (c) a broadcasting service; or
  - (d) a broadcasting service (within the meaning of the *Broadcasting Services Act 1992*).

9. 'Material' is also defined in s 5 of the Act and means material whether in the form of text, data, speech, music or other sounds, visual images (moving or otherwise) or in any other form or combination of forms.
10. 'Carriage service' is a service for carrying communications by means of guided and/or unguided electromagnetic energy.<sup>2</sup> In this case, the carriage service is the internet.
11. YouTube is an electronic service as it allows end-users to access material including long and short-form video content using the internet. YouTube also delivers that material to end-users using the internet.

#### **Material is accessible to end-users in Australia (s 63C(6)(a))**

12. Material is accessible to, or delivered to, end-users in Australia if the end-users are physically located in Australia and the material is capable of being accessed by, or is received by, them.
13. Material on YouTube is accessible to, and delivered to, end-users in Australia.

#### **A significant purpose of YouTube is to enable online social interaction between two or more end-users (s 63C(1)(a)(i))**

14. eSafety considers that the current purposes<sup>3</sup> of YouTube are:

1. To share and consume long and short-form video content (**Purpose 1**)
2. To actively engage with content, creators, audiences, and other end-users of the service (**Purpose 2**)
3. To share and consume professionally produced content (listening to music, watching or listening to podcasts, or watching TV shows and movies) in an on-demand capacity (**Purpose 3**)

#### Consideration of identified purposes and 'online social interaction'

15. The relevant question is whether the above purposes can be categorised as online social interaction purposes (**OSI purposes**).
16. Online social interaction includes online interaction that enables end-users to share material for social purposes.<sup>4</sup> eSafety's [Regulatory Guidance](#) and [self-assessment tool](#) detail our approach to considering what 'online social interaction' means practically, such as 'an end-user's engagement with other end-users or their material through an electronic

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<sup>2</sup> *Telecommunications Act 1997* (Cth), s 7.

<sup>3</sup> As well as taking into account information that has been provided by the service and publicly available information, eSafety has also considered how the service is used by end-users.

<sup>4</sup> s 63C(2).



service, whether active or passive, including by communicating, sharing material, participating in communities and/or expressing reactions'.<sup>5</sup>

17. Online social interaction does not include, for example, online business interaction or the sharing of material for business purposes.<sup>6</sup>

18. We consider that Purposes 1 and 2 are OSI purposes because they enable end-users to engage with other end-users or their material for social purposes (whether active or passive), and this engagement is the main type of interaction:

- a. Purpose 1: to share and consume long and short-form content
  - i. YouTube's core functionality is to enable the uploading of long and short-form content to a user's channel for other end-users to consume.
  - ii. Consumption of content on YouTube is primarily facilitated by way of watching videos, where specific features, such as auto-play or continuous scroll, are deployed to serve end-users content with limited user-input required.
  - iii. YouTube recommends material to end-users to keep them continually engaged, with recommendations based on several factors, such as an end-user's established interests, other content or users that end-users have interacted with on the service, and the popularity of the material across the broader YouTube service. This is served to end-users as a continuous feed of content recommendations based on their activity on the service.
- b. Purpose 2: to actively engage with creators, audiences and other end-users of the service
  - i. YouTube facilitates active engagement between end-users by, for example comment sections open for public comment and reply, 'like', 'save' and 'share' features for users to directly interact with user content, and a 'Communities' feature, which allows end-users to directly engage with and link to other end-users with shared interests.
  - ii. YouTube allows end-users to personalise their network by 'subscribing' to other end-user's 'channels' to remain up to date with the content those end-

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<sup>5</sup> at p 53 of eSafety's Regulatory Guidance

<sup>6</sup> See Note 1 to s 63C of the Act.

users post to the service. End-users can create this network by searching for creators or discovering creators via recommendations.

19. We consider that Purpose 3 is not best categorised as an OSI purpose because the most prevalent form of interaction is online business interaction.

'Online social interaction' is a significant purpose of YouTube

20. As set out in eSafety's Regulatory Guidance, 'a significant purpose' is a purpose which is important and meaningful rather than one which is merely incidental or subsidiary.<sup>7</sup>

21. In assessing whether enabling online social interaction between two or more end-users is a significant purpose of YouTube, eSafety has specifically considered whether end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced. For example:

- a. The ability to share and consume content on the service is the core functionality of YouTube. Neither the sharing nor consumption of content would be possible without the other.
- b. Further, active engagement with content, creators and audiences alike is a core function of YouTube that directly contributes to engagement on the service. For example, the ability to subscribe to other end-users is a form of active engagement that:
  - i. allows subscribers to remain up to date with end-users whose content they want to consume or engage with, and
  - ii. allows end-users to engage directly with their audience.
- c. If the functionality that enabled these features were removed or reduced, it is unlikely that most end-users would continue to use YouTube.

22. Having regard to:

- a. the purposes of YouTube identified above; and
- b. that both Purposes 1 and 2 are OSI purposes; and

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<sup>7</sup> Ibid.



- c. that it is unlikely that end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced,

eSafety considers that enabling online social interaction between two or more end-users is a significant purpose of YouTube.

**YouTube allows end-users to link to and interact with other end-users (s 63C(1)(a)(ii))**

23. As identified at paragraph 18, YouTube allows end-users to link to, or interact with, some or all of the other end-users by subscribing to other end-users, joining communities, leaving comments, and expressing reactions ('liking') to content.

**YouTube allows end-users to post material (s 63C(1)(a)(iii))**

24. As identified at paragraph 18, YouTube allows end-users to post material on the service, including uploading long and short-form video content, or posting and replying to comments on the service.

**YouTube does not fall within a class of excluded services (s 63C(6)(b))**

25. Section 63C(6)(b) of the Act states that an electronic service is *not* an age-restricted social media platform if the service is specified in the legislative rules.

26. On 29 July 2025, the Minister for Communications made the Rules specifying classes of services that are not age-restricted social media platforms.

27. Having considered the purposes of YouTube identified above, and in particular rules 5(1)(c), (e) and (f), eSafety's preliminary view is that YouTube does not fall within one or more of the classes of services specified in the Rules.

28. 'Sole purpose' means the only object for which anything exists or is done, made, used etc.<sup>8</sup> 'Primary purpose' means the purpose which is first or highest in rank or importance.<sup>9</sup> While eSafety understands that YouTube can be used to:

- a. share information for the purpose of product or service reviews (5(1)(c)),
- b. support an end-user's education and does contain educational content (5(1)(e)), and
- c. gives users the ability to share and consume content related to health, and consequently can support in health education of users (5(1)(f)),

any such uses for those purposes are a byproduct of the primary purpose of the service, being to share, consume and otherwise engage or interact with content.

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<sup>8</sup> See Regulatory Guidance, p. 54; [Macquarie Dictionary Online \(2025\)](#).

<sup>9</sup> [Macquarie Dictionary Online \(2025\)](#).

## Conclusion

29. For the reasons outlined above, eSafety's preliminary view is that YouTube is an age-restricted social media platform.

## Reasons for preliminary view: YouTube Kids

### YouTube Kids is an electronic service

30. YouTube Kids is an electronic service as it allows end-users to access material including long and short-form video content using the internet. YouTube Kids also delivers that material to end-users using the internet.

31. For the purposes of a separate assessment under s 63C of the Act, eSafety considers YouTube Kids is a separate electronic service from the primary YouTube service. This is because it is, on balance, administered to end-users via a separate application and interface and is not accessible through the primary YouTube platform in a manner that would reasonably enable online social interaction.

### Material is accessible to end-users in Australia (s 63C(6)(a))

32. Material on YouTube Kids is accessible to, and delivered to, end-users in Australia.

### A significant purpose of YouTube Kids is to enable online social interaction between two or more end users (s 63C(1)(a)(i))

33. eSafety considers the current purposes<sup>10</sup> of YouTube Kids are:

1. To enable children to watch YouTube videos in an age-appropriate and accessible manner (**Purpose 1**)
2. To allow parents or guardians to retain control over a child's viewing experience (**Purpose 2**)

### Consideration of identified purposes and 'online social interaction'

34. We consider that Purpose 1 is an OSI purpose because it enables end-users to engage with other end-users or their material for social purposes (whether active or passive), and this engagement in the main type of interaction:

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<sup>10</sup> As well as taking into account information that has been provided by the service and publicly available information, eSafety has also considered how the service is used by end-users.



- a. Purpose 1: to enable children to watch YouTube videos in an age-appropriate and accessible manner
  - i. Consumption of content on YouTube Kids is primarily facilitated by way of watching videos, where specific features, such as auto-play or continuous scroll, are deployed to serve end-users content with limited user-input required.
  - ii. YouTube Kids allows end-users to personalise their network of content for consumption by 'subscribing' to 'channels' belonging to end-users on the primary YouTube service, to remain up to date with the content those end-users' post. End-users can create this network by searching for creators or discovering creators via recommendations.
  - iii. YouTube Kids recommends material to end-users to keep them continually engaged, with recommendations based on several factors, such as an end-user's established interests, other content or users that end-users have interacted with on the service, and the popularity of the material across the broader YouTube Kids service. This is served to end-users as a continuous feed of content recommendations based on their activity on the service.

35. We consider that Purpose 2 is not best categorised as an OSI purpose.

'Online social interaction' is a significant purpose of YouTube Kids

36. In assessing whether enabling online social interaction between two or more end-users is a significant purpose of YouTube Kids, eSafety has specifically considered whether end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced. For example:

- a. The core functionality of YouTube Kids is to enable end-users to consume age-appropriate content. Without this purpose, the service would be indistinguishable from the primary YouTube service, and end-users would be unlikely to use the service.

37. Having regard to:

- a. the purposes of YouTube Kids identified above; and
- b. that Purpose 1 is an OSI purpose; and
- c. that it is unlikely that end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced,

eSafety considers that enabling online social interaction between two or more end-users is a significant purpose of YouTube Kids.

**YouTube Kids does not allow end-users to link to and interact with other end-users (s 63C(1)(a)(ii))**

38. YouTube Kids does not allow end-users to link to, or interact with, some or all of the other end-users of the service. For example, YouTube Kids does not allow end-users to 'subscribe' to other end-users of YouTube Kids as the service does not allow end-users to have 'channels' which can be subscribed to, but 'profiles' instead. YouTube Kids instead only allows end-users to subscribe to channels that have been filtered from the primary YouTube service based on the age-appropriateness of the content. That is, the end-users of YouTube Kids cannot link to or interact with end-users of YouTube Kids. They are instead linking to or interacting with end-users of primary YouTube service.

**YouTube Kids does not allow end-users to post material (s 63C(1)(a)(iii))**

39. YouTube Kids does not allow end-users to post material on the service, as end-users of YouTube Kids are unable to post material directly to the YouTube Kids service; all content is posted to the primary YouTube service and must be identified as age-appropriate to be available on the YouTube Kids service. End-users of YouTube Kids cannot post directly to YouTube Kids.

40. eSafety considers that YouTube Kids is not an age-restricted social media platform because it does not meet the relevant conditions in s 63C(1) of the Act.

**YouTube Kids does not fall within a class of excluded services (s 63C(6)(b))**

41. For completeness, eSafety has also considered whether YouTube would fall within one or more of the excluded classes of services specified in the Rules.
42. Section 63C(6)(b) of the Act states that an electronic service is *not* an age-restricted social media platform if the service is specified in the legislative rules
43. Having considered the purposes of YouTube Kids identified above, and in particular rule 5(1)(e), eSafety's preliminary view is that YouTube Kids does not fall within one or more of the classes of services specified in the Rules.
44. While eSafety understands that YouTube Kids can be used to support an end-user's education and does contain educational content (5(1)(e)), any such use for this purpose is a byproduct of the primary purpose of the service, being to watch videos in an age-appropriate and accessible manner.



## Conclusion

45. For the reasons outlined above, eSafety's preliminary view is that YouTube Kids is not an age-restricted social media platform.

## Reasons for preliminary view: Google Classroom

### Google Classroom is an electronic service

46. Google Classroom is an electronic service as it allows end-users to access material using the internet. Google Classroom also delivers that material to end-users using the internet.

### Material is accessible to end-users in Australia (s 63C(6)(a))

47. Material on Google Classroom is accessible to, and delivered to, end-users in Australia.

### The sole purpose of Google Classroom is to enable online social interaction between two or more end-users (s 63C(1)(a)(i))

48. eSafety considers the current purpose of Google Classroom<sup>11</sup> is to facilitate and support the education of end-users.

### Consideration of identified purpose and 'online social interaction'

49. We consider that the above purpose is an OSI purpose because it enables end-users to engage with other end-users or their material for social purposes (whether active or passive), and this engagement is the main type of interaction:

- a. Google Classroom allows end-users to upload material to its service to limited or broader audiences, including documents, comments or other learning materials,
- b. Teachers or educators can create a personalised network of other users by adding students to a 'classroom' by invitation,
- c. Teachers and students can directly communicate on the service by way of private messaging.

### 'Online social interaction' is the sole purpose of Google Classroom

50. Having regard to:

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<sup>11</sup> As well as taking into account information that has been provided by the service and publicly available information, eSafety has also considered how the service is used by end-users.

- a. the purpose of Google Classroom identified above; and
- b. that the purpose is an OSI purpose,

eSafety considers that enabling online social interaction between two or more end-users is the sole purpose of Google Classroom.

51. Even if this is not the *sole* purpose of Google Classroom, eSafety considers that, in the alternative, enabling online social interaction between two or more end-users is a *significant* purpose of Google Classroom.

'Online social interaction' is a significant purpose of Google Classroom

52. In assessing whether enabling online social interaction between two or more end-users is a significant purpose of Google Classroom, eSafety has specifically considered whether end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced. For example:

- a. The core functionality of Google Classroom is to facilitate the sharing and communication of educational content between teacher, educators and students.
- b. If the features that facilitated the sharing of education content in an insular, controlled environment were removed, it is unlikely end-users would continue to use the service.

53. Having regard to:

- a. the purpose of Google Classroom identified above; and
- b. that this purpose enables online social interaction; and
- c. that it is unlikely that end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced,

eSafety considers that enabling online social interaction between two or more end-users is a significant purpose of Google Classroom.

**Google Classroom allows end-users to link to and interact with other end-users  
(s 63C(1)(a)(ii))**

54. As identified at paragraph 49, Google Classroom allows end-users to link to, or interact with, some or all of the other end-users by way of messaging and commenting.



### **Google Classroom allows end-users to post material (s 63C(1)(a)(iii))**

55. As identified at paragraph 49, Google Classroom allows end-users to post material on the service, including by way of documents, posts, comments or other learning materials.

### **Google Classroom falls within a class of excluded services (s 63C(6)(b))**

56. Section 63C(6)(b) of the Act states that an electronic service is *not* an age-restricted social media platform if the service is specified in the legislative rules.

57. Having considered the purposes of Google Classroom identified above, and in particular rule 5(1)(e), eSafety's preliminary view is that Google Classroom falls within one or more of the classes of services specified in the Rules.

58. Google Classroom is designed for teachers and educators to create a virtual 'class' with dedicated features and forums related to classwork. It is often exclusively used in a school, tutoring or homeschooling setting to support and facilitate the education of those who use the service. Due to Google Classroom's limited, targeted functionality, and insular and controlled environment, eSafety considers the sole or primary purpose of Google Classroom to be supporting the education of end-users.

### **Conclusion**

59. For the reasons outlined above, eSafety's preliminary view is that Google Classroom is not an age-restricted social media platform.

### **Next steps**

60. We seek Google's response to eSafety's preliminary view by 16 October 2025. We will consider any submissions and evidence that Google provides before conducting our final assessment of the Google Services before the SMMA obligation comes into effect.

61. Should Google disagree with any of eSafety's assessments, please also indicate whether Google nevertheless proposes to comply with Part 4A of the Act.

62. eSafety proposes to publish on its website a list of platforms that eSafety considers, on a preliminary basis, to be age-restricted social media platforms. That list will include information about whether or not a platform agrees with eSafety's assessment.

63. Please contact [REDACTED] [@eSafety.gov.au](mailto:[REDACTED]@eSafety.gov.au) should you wish to discuss this letter further.

Yours sincerely

Julie Inman Grant  
eSafety Commissioner