

FACTSHEET ON OSAR FOR D-ADSs

- The Online Safety Assessment Report (OSAR) 2026 for Designated App Distribution Services¹ (D-ADSs) sets out IMDA's first assessment of the five D-ADSs' online safety measures under the Code of Practice for Online Safety - App Distribution Services (ADS Code). The OSAR covers the reporting period from 1 April 2025 to 31 December 2025.
- IMDA assessed whether the D-ADSs' measures were Present, Comprehensive, and Effective, using information from D-ADSs' annual online safety reports to IMDA, together with IMDA's own mystery shopper testing, direct testing, and operational data. This assessment focused on the D-ADSs':
 1. Effectiveness of age assurance measures and enhanced protections for children;
 2. Effectiveness of safety measures to remove egregious and harmful apps;
 3. Effectiveness of safety measures to assign appropriate age-ratings to apps; and
 4. Effectiveness of user reporting and resolution measures.

Overall Assessment

- Baseline safety measures were in place across all five D-ADSs, with no systemic breaches of the ADS Code. However, IMDA's testing found weaknesses in how several measures were implemented.

Key findings

- **Age assurance (AA) measures were found to be present and well implemented on all D-ADSs**, where IMDA tested for the presence of the measures, ease of use and ease of circumvention by simulating the real-world user experience at the different stages where AA checks may be triggered.

¹ The five D-ADSs are Apple App Store, Google Play Store, Huawei AppGallery, Microsoft Store, and Samsung Galaxy Store. Microsoft Store comprises 5 storefronts - Microsoft Store on Windows, Apps.microsoft.com Website Store, PC Games Store, Xbox console storefront, and the part of Xbox.com Website having the characteristics of an app distribution service as specified in the Fourth Schedule of the Broadcasting Act 1994.

- IMDA found that the AA methods deployed by the D-ADSs were present and sample testing found that the measures generally could not be easily circumvented, but noted that there is no AA method that is completely foolproof. A small percentage of users on Huawei AppGallery were able to circumvent AA under specific circumstances on certain versions of the AppGallery due to technical limitations. Following IMDA's engagement, Huawei has committed to working with IMDA to monitor and address the issue.
- Age assurance measures must be implemented in accordance with the Personal Data Protection Act (PDPA). Based on information submitted by the D-ADSs, the Personal Data Protection Commission (PDPC) observed positive data protection practices, including AA-specific notices and consent mechanisms, measures to limit the amount of personal data collected or retained, and the deletion or non-retention of certain underlying information or documents used for age checks. However, there were areas where more detailed information would have provided greater clarity on how personal data is handled
- **Children were largely restricted from downloading 18+ apps by default on all D-ADSs** after the D-ADS establishes via its AA measures that a user is a child (below 18 years old). However, IMDA's test uncovered limited instances on Huawei AppGallery and Microsoft Store where these restrictions were either not present or could be bypassed due to loopholes that allowed children to turn off the restrictions. Following IMDA's engagement, these have mostly been rectified.
- **All D-ADSs had the required content guidelines and app review processes, and age-rating policies.** However, IMDA's mystery shopper testing of over 7,000 detected 65 apps that contained or facilitated harmful content that violated the D-ADSs' own policies, and 24 apps containing 18+ content that were wrongly age-rated² on Apple App Store, Google Play Store and Huawei AppGallery. These were subsequently removed or re-rated after IMDA's mystery shopper user reporting or IMDA's reporting.

² Apps that should have been rated 18+ under their respective age-rating policies but were assigned a lower age-rating.

- The most prevalent types of harmful and inappropriate content were sexual content, violent content, and content facilitating vice and organised crime.
 - While the number of the apps identified was small relative to the large number of apps available on the D-ADSs, this shows that some harmful and inappropriate apps may still slip through existing safeguards as the D-ADSs work to strengthen their content moderation and app review processes.
 - IMDA will continue to hold D-ADSs responsible for ensuring that users' access or exposure to harmful content on their services are minimised, and that age ratings are applied accurately and consistently. Accurate age ratings should be applied to minimise children's access or exposure to age-inappropriate content, and to provide parents and guardians with accurate information on the suitability of apps for their children.
- **All D-ADSs had provided user reporting channels³ but were either inconsistent in notifying users of the outcome of their user reports, or completely failed to do so.** IMDA also found that Google Play Store and Samsung Galaxy Store did not notify users who had downloaded an app within six months of its removal from the app store.
 - These requirements are to ensure that users are made aware of whether their reports have been assessed and the outcome, including whether an app they have downloaded may contain or facilitate harmful content, and that the app has been removed from the app store.
 - Following IMDA's engagement, the D-ADSs have investigated and agreed to improve their notification processes.
 - **All D-ADSs submitted the required accountability metrics for the first OSAR.** The most prevalent type of violative apps that D-ADSs took action against either proactively or a result of user reports, was apps with content facilitating vice and organised crime, followed by apps with sexual content. IMDA also observed that all D-ADSs reported zero or near zero user reports on harmful or inappropriate content.
 - However, Google Play Store, Huawei AppGallery, and Samsung Galaxy Store will need to provide better metrics to demonstrate the effectiveness of their user

³ These includes in-store flagging, online webforms, hotlines or service-chat functions

reporting mechanisms in the next annual online safety report. Following IMDA's engagement, the D-ADSs have committed to exploring better metrics.

- Since the introduction of the ADS Code in March 2025, the D-ADSs have stepped up efforts to implement online safety measures for Singapore users.
- This OSAR found that a baseline of safety measures is in place across the five D-ADSs. That said, these measures need to be implemented effectively to keep users safe. While the D-ADSs have safeguards to help protect children under 18, everyone can play a part in fostering a safer online environment, especially for children. IMDA will continue working with D-ADS to ensure that the measures are properly implemented and issues rectified.

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