

SINGAPORE'S ONLINE SAFETY (RELIEF AND ACCOUNTABILITY) BILL: A NEW ERA OF TECHNOLOGY REGULATION?

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On 5 November 2025, Singapore's Parliament passed the Online Safety (Relief and Accountability) Bill (Bill No 18/2025), a significant piece of legislation that offers redress and protection against online harms. This article provides an overview of the key provisions of the Bill.

LIM Fang-Zhou, Noah¹

LLB (National University of Singapore) (First Class Honours);

Advocate and Solicitor (Singapore);

Trainee Associate (Clifford Chance Pte Ltd).

I. Introduction

1 On 5 November 2025, Singapore's Parliament passed the Online Safety (Relief and Accountability) Bill² ("OSRA Bill"). First announced by Prime Minister Lawrence Wong in October 2024,³ the Bill establishes the new Online Safety Commission ("OSC") to administer a statutory reporting mechanism for the removal of harmful content, and creates statutory torts to hold perpetrators and platforms accountable. This article provides an overview of the OSRA Bill, before turning to consider how the Bill represents merely the next step of Singapore's evolving journey to meaningfully regulate technology.

1 This paper is written in the author's personal capacity. All opinions expressed herein are entirely the author's own, and all errors and mistakes remain the author's alone. The author is grateful to Elaine Lum and the Academy Publishing team for their excellent copyediting.

2 Bill No 18/2025.

3 Lawrence Wong, Prime Minister, speech at the launch of Smart Nation 2.0 (1 October 2024) <<https://www.pmo.gov.sg/newsroom/pm-lawrence-wong-at-the-launch-of-smart-nation/>> (accessed 25 March 2026).

II. Overview of Online Safety (Relief and Accountability) Bill

2 As technology and the Internet become more embedded in daily life, new dangers and harms have emerged. Government figures indicate that in 2024, “[a]bout 75% of Singaporeans had encountered harmful online content”⁴ and as of November 2025, “more than four in five [Singaporeans] had encountered harmful online content in the past year”.⁵ Vulnerable groups are disproportionately affected by harmful online content,⁶ and emergent, decentralised technologies may exacerbate this risk.

3 The OSRA Bill aims to “strengthen online safety and protect Singaporeans from online harms”.⁷ To this end, the Bill establishes the new OSC led by the Commissioner of Online Safety (“Commissioner”).⁸ This represents a fairly unique development, given that Singapore will be “one of only a few countries worldwide”⁹ to have a “dedicated agency that will support victims of specified online harms ... to seek timely relief from perpetrators and platforms”.¹⁰

4 The OSC is expected to be set up by the first half of 2026,¹¹ and will offer recourse against “online harmful activity”, defined under the Bill to refer to 13 types of online activities, namely:

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- 4 Singapore Parl Debates; Vol 95, Sitting No 160; [7 March 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).
 - 5 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information); see also Rachel Lim, “84% of Singapore residents encountered harmful online content in the past year: MDDI survey”, CNA (10 October 2025) <<https://www.channelnewsasia.com/singapore/harmful-online-content-behaviour-mddi-surveys-5392181>> (accessed 25 March 2026).
 - 6 Singapore Parl Debates; Vol 95, Sitting No 88; [28 February 2023] (Baey Yam Keng, Member of Parliament for Tampines).
 - 7 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).
 - 8 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 5.
 - 9 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).
 - 10 Singapore Parl Debates; Vol 96, Sitting No 7; [14 October 2025] (Josephine Teo, Minister for Digital Development and Information).
 - 11 Singapore Parl Debates; Vol 95, Sitting No 160; [7 March 2025] (Josephine Teo, Minister for Digital Development and Information); Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

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(a) online harassment; (b) doxxing; (c) non-consensual disclosure of private information; (d) online stalking; (e) intimate image abuse; (f) image-based child abuse; (g) online impersonation; (h) inauthentic material abuse; (i) publication of false material; (j) publication of statement harmful to reputation; (k) online instigation of disproportionate harm; (l) incitement of enmity; and (m) incitement of violence. The elements constituting these categories of “online harmful activity” are set out in Pt 3 of the Bill,¹² and *generally* include considerations of reasonableness, or what a reasonable person would conclude under the circumstances.¹³ There are some harms, however, which do not apply this reasonable person test, *eg*, image-based child abuse is established where online material is communicated under certain prohibited contexts.¹⁴ The list of harmful activities is not exhaustive and may be further supplemented through regulations prescribing online activities that are “likely to cause harm to persons in Singapore”.¹⁵ This list will be continuously reviewed, though the Minister’s discretion will be exercised “judiciously”.¹⁶

5 The implementation of the OSRA Bill will be phased to ensure that urgent issues are tackled, while allowing time for the OSC to manage its caseload and develop its enforcement capabilities.¹⁷ Thus, five categories of online harmful activities – online harassment, doxxing, online stalking, intimate image abuse, and image-based child abuse – representing the “most severe and prevalent harms”,¹⁸ will be prioritised for immediate implementation when the law comes into effect in 2026, with the remaining categories to be phased in subsequently.

12 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) Pt 3.

13 See, *eg*, Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 9–12, *cf* Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 13–14.

14 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 14.

15 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 3: see limb (n) of the definition of “online harmful activity”.

16 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

17 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

18 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).

6 Some categories of harmful online activities are already covered under existing legislation, *eg*, online harassment is covered by the Protection from Harassment Act 2014¹⁹ (“POHA”) while group harms may be caught by the Maintenance of Religious Harmony Act 1990²⁰ and the Maintenance of Racial Harmony Act 2025.²¹ The OSRA Bill is intended to “complement these existing laws” by “expanding the scope of harms covered ... [and] allowing victims to seek recourse in a simple and timely manner”.²² The value of the OSRA Bill comes not just from its ability to allow victims to seek redress, but also its ability to clarify the duties owed by key stakeholders within the online ecosystem. As observed by Parliament, “studies have shown that Singaporeans see online safety as a shared responsibility”,²³ and the Bill clarifies the standards of conduct expected from all responsible parties. As summarised by the Minister for Law:²⁴

[The OSRA Bill can] have the effect of setting the right tone for online behaviour, [and] shape mindset[s] and attitudes, of both users as well as service providers. They define what is acceptable and what is not. They will guide conduct not only through monetary damages, but through shared expectations made explicit.

7 To this end, the Bill introduces three key mechanisms, each of which serves a meaningful function.

A. Statutory reporting mechanism

8 A key pillar of the OSRA Bill is its statutory reporting mechanism, which allows an eligible victim to make a report to the Commissioner or OSC regarding any alleged online

19 2020 Rev Ed.

20 2020 Rev Ed.

21 Act 10 of 2025. Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

22 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

23 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).

24 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

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harmful activity.²⁵ The Commissioner “will only assess reports submitted ... [and] will not actively monitor and identify cases of online harms”,²⁶ making this mechanism more “fire-alarm” than “police-patrol”.²⁷

9 To be eligible to make a report, the victim must be: (a) a Singaporean citizen; (b) a Singaporean permanent resident; or (c) a person with a prescribed connection to Singapore²⁸ – at the outset, this latter limb will cover “foreigners who are residing in Singapore for the long term”.²⁹ Under certain circumstances, a report may be made on behalf of a victim, such as where the victim has provided written authorisation or consent for the report to be made on their behalf, or where the victim is below 18 years of age.³⁰

10 Before making a report, the individual may also be required to comply with any prescribed requirements or preconditions.³¹ The Government has indicated that victims will generally be required to report the online harm to the platforms as the “first port of call”, and a report may be filed to the Commissioner where the platform fails to act within 24 hours³² – for certain egregious online harms, such as doxxing, intimate image abuse and image-based child abuse, reports may be submitted directly to the Commissioner. These conditions and requirements will be crystallised in due course via subsidiary legislation.

11 On receiving a report, the Commissioner is to conduct an assessment to determine if any further action or investigation

25 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 22–23.

26 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

27 See generally, albeit in the context of data protection, Simon Chesterman, “Data Protection Law” in *Law and Technology in Singapore* (Simon Chesterman, Goh Yihan & Andrew Phang eds) (Academy Publishing, 2nd Ed, 2025) at para 23.028.

28 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 22(1)–22(3).

29 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

30 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 22(2).

31 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 23(2).

32 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

is necessary, and may seek further information or exercise the Commissioner’s powers of investigation.³³ Where appropriate, the Commissioner may dismiss any report where the report is “trivial, frivolous or vexatious or not made in good faith”,³⁴ and individuals who provide false information may be held criminally liable.³⁵

12 Where the Commissioner “has reason to suspect” that online harmful activity was conducted, the Commissioner may give one or more Pt 5 directions.³⁶ There are different types of Pt 5 directions, including stop communication directions, restraining directions, account restriction directions, and access disabling directions, each of which is further defined and clarified within the OSRA Bill.³⁷ Notably, the recipients of such directions are not limited to the communicators of online material; they may also include other parties, such as the administrator of an online location as well as an online service provider. The short point is that the Bill provides for a range of different directions, which may be issued to different categories of recipients.

13 The Commissioner’s power to give Pt 5 directions is, however, subject to two conditions:

(a) Where the online harmful activity in question is the publication of false material, only a right-of-reply direction (applicable either to the user or the online service) may be given, except in limited circumstances.³⁸

(b) Where the online harmful activity in question is the publication of a statement harmful to the victim’s reputation, only a right-of-reply direction (applicable either to the user or the online service) may be given.³⁹

33 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 24(1)–24(3).

34 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 25.

35 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 69.

36 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 26(1).

37 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 28–40.

38 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 26(5).

39 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 26(6).

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14 In deciding whether to issue a Pt 5 direction as well as the type of direction to be issued and its scope, the Commissioner may consider the various factors enumerated within the Bill.⁴⁰ This “basket of factors” is intended to provide the Commissioner with greater flexibility to act according to the circumstances at hand,⁴¹ and the OSC will publish guidelines in due course detailing the factors that the OSC will consider.⁴²

15 Any Pt 5 direction is binding on the recipient, and failure to comply with any direction without any reasonable excuse is an offence.⁴³ The OSRA Bill provides for an escalation in the powers of the Commissioner: In the event of any party’s non-compliance with a Pt 5 direction, the Commissioner may give an order directing that party to do or not do an act, whether in Singapore or outside Singapore.⁴⁴ Failure to comply with such orders is an offence punishable, on conviction, with a significant fine.⁴⁵ It has been acknowledged that such orders, such as access blocking orders or app removal orders, are far more draconian in scope in so far as they may “affect all users in Singapore”, and will only be used after “careful consideration”.⁴⁶

16 The OSRA Bill provides for a two-stage appeal mechanism. At first instance, the recipient of either a Pt 5 direction or an order from the Commissioner may make a written application to the Commissioner to reconsider their initial decision, direction or order,⁴⁷ and this reconsideration will be conducted on a *de novo* basis (*ie*, the decision will be re-assessed afresh).⁴⁸ Following the Commissioner’s reconsideration, the Commissioner must inform

40 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 27.

41 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

42 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

43 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 41 and 71.

44 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 43.

45 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 72.

46 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

47 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 56–59.

48 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

the applicant of the result of that reconsideration.⁴⁹ Where the applicant remains dissatisfied with the outcome, they may make a further appeal to the Online Safety Appeal Panel.⁵⁰ This appeal will thereafter be heard by an Appeal Committee constituted by the Chairman of the Appeal Panel,⁵¹ and any subsequent determination is final. Where an individual continues to remain dissatisfied with the outcome, their only other route of recourse would be to seek judicial review of the Appeal Committee’s decision.⁵²

17 The rationale underlying the OSC’s operational model is that it is intended to deliver “speedy, practical relief” through a “straightforward, fast and simple” process.⁵³ This design was based on the Government’s findings that: (a) over 50% of legitimate user complaints were not addressed in the first instance, notwithstanding victims’ reliance on platforms to stop online harms;⁵⁴ and (b) victims can find court processes “complex and expensive”.⁵⁵ For this reason, the Government legislated having “reason to suspect” as the relevant threshold for the issuance of Pt 5 directions, as opposed to the threshold of having “reasonable grounds to believe”.⁵⁶ It was also on this basis that the Government rejected suggestions to remove the finality of an Appeal Committee’s decision and to add a right of appeal to the General Division of the High Court – such proposals, it was reasoned, would “make the process slower ... more complex and ultimately, less accessible for victims”.⁵⁷

49 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 59(1)–59(2).

50 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 60–63.

51 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 64.

52 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

53 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

54 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

55 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).

56 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Rahayu Mahzam, Minister of State for Digital Development and Information).

57 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

B. Statutory torts

18 Separately, the Bill establishes a statutory torts framework, enabling victims to bring civil proceedings to claim damages or seek an injunction against the parties responsible for “causing or continuing the harm”.⁵⁸ These statutory torts⁵⁹ clarify the duties and liabilities of three key stakeholders:⁶⁰

- (a) a communicator, meaning any person who communicates the relevant material;
- (b) an administrator, which generally refers to any person who maintains or manages an online location (*eg*, the moderator or administrator of an online space on a social media platform); and
- (c) an online service provider, meaning the provider of an online service, where the online service provided is neither an Internet access service nor an app distribution service (*eg*, social media platforms).

19 Where a claimant succeeds in claim, the court may award any damages that the court considers “just and equitable”. This may include damages for loss of future earnings and loss of earning capacity, an account of profits,⁶¹ and other heads of damages which will be prescribed by the Minister in regulations, with the ultimate aim of “ensur[ing] that victims are properly compensated and that wrongdoers are not allowed to benefit from their behaviour”.⁶² The court may also award enhanced damages,⁶³ which are targeted at the “root cause of the harm, such as recalcitrant communicators or administrators who create harmful websites or chatgroups”.⁶⁴ In addition to damages, the

58 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).

59 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) Pts 10–13.

60 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 3.

61 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 96–98.

62 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

63 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 98.

64 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

court may issue injunctions to stop any further harm,⁶⁵ which “operate independently of any direction from the OSC, [thus] giving victims complementary routes to relief”.⁶⁶

20 While it might *seem* that the OSRA Bill overlaps with the remit of existing legislation, the Government has indicated that the Bill is scoped in such a way that enhances protections for individuals, while “[ensuring] coherence in our legislation”; there is “no overlapping and no double remedy”.⁶⁷ To illustrate this, the offences of harassment, doxxing and stalking are presently dealt with under the POHA.⁶⁸ The Bill amends the relevant provisions dealing with harassment under the POHA to incorporate the definition of “online harassment” under the OSRA Bill – which includes causing a person “humiliation” – but the POHA continues, and will continue, to remain the main legislation dealing with the offences of harassment, doxxing and stalking.⁶⁹ The OSRA Bill complements the POHA by creating new statutory duties in relation to such harms which extend to administrators and online service providers.⁷⁰ The existing delineation between different pieces of legislation is thus largely undisturbed, while additional protections under the Bill will come into force.

21 More pertinently, the statutory framework creates agency on the part of victims by requiring them to initiate the tortious claims necessary to vindicate their rights. To this end, the OSRA Bill expressly clarifies that a public agency cannot commence a claim under the statutory torts framework.⁷¹ This clear delimitation of the framework as a “private citizens’ private remedy” thus complements the Bill’s underlying intention to

65 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 99.

66 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

67 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

68 Protection from Harassment Act 2014 (2020 Rev Ed) ss 3–4, and 7.

69 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

70 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 89–91 and 93–94.

71 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 4.

“make self-responsibility a default in our online spaces”,⁷² by affirming that the enforcement of personal rights is a matter of individual agency and initiative, rather than reliance on state intervention. In so doing, the Bill reframes victims not as passive recipients of protection but as active participants capable of shaping the norms of online conduct, thereby fostering a culture of accountability and empowerment.

C. Identity disclosure

22 The final mechanism under the OSRA Bill seeks to alleviate difficulties faced by victims in ascertaining the identity of the person responsible for online harmful activity, and consequently, in seeking restitution and closure.⁷³ Pursuant to the Bill, the Commissioner may require online service providers to retain all relevant records⁷⁴ as well as disclose identity information relating to users suspected of engaging in online harmful activities.⁷⁵ The Commissioner is also empowered to require prescribed online service providers to take “reasonable steps” to obtain specified information that may identify an end user who is reasonably suspected of engaging in online harmful activity.⁷⁶

23 Where the Commissioner is in possession of information relating to the identity of an end user, they may, on receipt of an application by a victim (or on behalf of a victim) eligible to make a statutory report, disclose such information to the victim.⁷⁷ However, the disclosed information can only be used for a prescribed purpose – such as enabling victims to bring civil proceedings against the hitherto unknown end-user – and its use is subject to any conditions imposed by the Commissioner. Failure to comply with any such conditions constitutes a criminal

72 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

73 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information)

74 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 48.

75 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 49.

76 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cl 52.

77 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 53(1)–53(3).

offence.⁷⁸ This mechanism is “aimed squarely at those who hide behind anonymity to cause online harm”, and recognises that disclosure of an end user’s identity may be necessary given that perpetrators may otherwise be “emboldened to act with impunity especially when they can remain anonymous”, with few avenues of recourse available to the affected victims.⁷⁹

III. Singapore’s evolving regulatory trajectory

24 More broadly, the OSRA Bill’s passage into law marks a significant moment in Singapore’s legislative evolution, as the nation enters a bold new era shaped by the rich promise of emerging and nascent technologies, and shadowed by unprecedented and insidious threats. For example, it has been noted that the development of artificial intelligence (“AI”) has created the multi-headed Hydra of misinformation and disinformation.⁸⁰ The need to respond to the novel risks posed by technology has engendered a push by Singapore towards strengthening existing regulatory levers,⁸¹ while expanding the existing suite of legislation to better protect Singaporeans from harms in the online space.⁸² To this end, the Bill represents a useful tool in the regulator’s toolbox, allowing the regulator to act expeditiously to curtail the spread of harmful content in the online space – though, admittedly, its utility remains constrained by jurisdictional limits.

25 Singapore appears to have adopted a more “modular” approach, where different statutes seek to tackle different facets of online risk. To illustrate this, online falsehoods are dealt with

78 Online Safety (Relief and Accountability) Bill (Bill No 18/2025) cll 53(3)–53(5).

79 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

80 Gerald Tan Han Jie, “Combating Misinformation and Disinformation in the Era of Generative Artificial Intelligence” [2025] SAL Prac 19.

81 Singapore Parl Debates; Vol 95, Sitting No 160; [7 March 2025] (Josephine Teo, Minister for Digital Development and Information).

82 Ministry of Home Affairs, “Introduction of the Online Criminal Harms Bill”, press release (8 May 2023) <<https://www.mha.gov.sg/mediaroom/press-releases/introduction-of-the-online-criminal-harms-bill/>> (accessed 25 March 2026).

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under the Protection from Online Falsehoods and Manipulation Act 2019,⁸³ online harassment under the POHA, and criminal activities under the Online Criminal Harms Act 2023.⁸⁴ As has been observed in Parliament, these statutes “target exceedingly diverse online content”,⁸⁵ and they represent part of a “holistic and balanced approach to online safety”⁸⁶ – discrete, individual plates interlocking together to form a resilient shield against online harms. It bears emphasis that significant forethought has gone into designing each of these “plates”. Indeed, the Government “started looking at developing [the OSRA] Bill as far back as 2021, even as the amendments to the Broadcasting Act and the Online Criminal Harms Act were being worked on”.⁸⁷

26 In tandem with these developments, there has also been a concerted push towards entrenching a system rooted in accountability.⁸⁸ For example, the Online Safety (Miscellaneous Amendments) Act 2022⁸⁹ amended the Broadcasting Act 1994⁹⁰ to require that providers of online communication services “provide a safe online environment for Singapore end-users”, and “place adequate priority on the protection of Singapore end-users who are children of different age groups from exposure to content which may be harmful to them”.⁹¹ Pursuant to these amendments, the Infocomm Media Development Authority (“IMDA”) has designated six social media services as regulated online communication services⁹² subject to the IMDA’s Code of

83 2020 Rev Ed.

84 Act 24 of 2023.

85 Singapore Parl Debates; Vol 95, Sitting No 107 (Pritam Singh, Member of Parliament for Aljunied).

86 Singapore Parl Debates; Vol 95, Sitting No 160; [7 March 2025] (Josephine Teo, Minister for Digital Development and Information).

87 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Edwin Tong Chun Fai, Minister for Law).

88 Singapore Parl Debates; Vol 95, Sitting No 75; [9 November 2022] (Nadia Ahmad Samdin, Member of Parliament for Ang Mo Kio): The Online Safety (Miscellaneous Amendments) Bill was described by the Member as aiming to “protect Singapore users from harmful online content and move beyond prescriptive statutory compliance towards public accountability”.

89 Act 38 of 2022.

90 2020 Rev Ed.

91 Online Safety (Miscellaneous Amendments) Act 2022 (Act 38 of 2022) s 5; Broadcasting Act 1994 (2020 Rev Ed) s 45A.

92 Infocomm Media Development Authority, “Designated Social Media Services” <<https://www.imda.gov.sg/-/media/imda/files/regulations-and-services>> (cont’d on the next page)

Practice for Online Safety.⁹³ This Code of Practice requires that designated social media services implement measures to enhance online user safety, particularly for children, and mandates that these services submit annual accountability reports to the IMDA documenting the measures that they have put in place.

27 With reference to these reports, the IMDA released its own Online Safety Assessment Report in February 2025,⁹⁴ which rated the measures taken by these social media services to comply with the Code. This demonstrates an effort to recognise the responsibilities of major platforms in ensuring a safe online environment and to hold them publicly accountable. The push for accountability in the technology sector also extends to AI, where the corpus of AI-related guidance highlights the role of organisational accountability within Singapore's existing regulatory framework and stresses the importance of accountability in fostering a trusted AI ecosystem.⁹⁵

28 Ultimately, Singapore's approach towards regulating the risks posed by technology appears to be a pragmatic and multi-layered one, where formal black-letter legislation is supplemented by an extensive combination of soft laws or

licensing/regulations/codes-of-practice/codes-of-practice-media/list-of-designated-social-media-services-subject-to-the-code-of-practice-for-online-safety.pdf> (accessed 25 March 2026).

93 Infocomm Media Development Authority, "Code of Practice for Online Safety" <<https://www.imda.gov.sg/-/media/imda/files/regulations-and-licensing/regulations/codes-of-practice/codes-of-practice-media/code-of-practice-for-online-safety.pdf>> (accessed 25 March 2026); see also Broadcasting Act 1994 (2020 Rev Ed) ss 45K(1) and 45L(1).

94 Infocomm Media Development Authority, "Online Safety Assessment Report Finds Social Media Services Have Safety Measures in Place for Singapore Users but More Needs to be Done" (17 February 2025) <<https://www.imda.gov.sg/resources/press-releases-factsheets-and-speeches/press-releases/2025/online-safety-assessment-report>> (accessed 25 March 2026).

95 Lim Fang-Zhou, Noah & Tan Kay Shin, "The New Frontier: Regulating Artificial Intelligence in Singapore" (2025) 37 SAclJ 436 at paras 19-45; see generally AI Verify Foundation & Infocomm Media Development Authority, *Model AI Governance Framework for Generative AI: Fostering a Trusted Ecosystem* (30 May 2024) <<https://aiverifyfoundation.sg/wp-content/uploads/2024/05/Model-AI-Governance-Framework-for-Generative-AI-May-2024-1-1.pdf>> (accessed 25 March 2026); and Ministry of Communications and Information & Smart Nation Singapore, *NAIS 2.0: Singapore National AI Strategy* (Government of the Republic of Singapore, 2023) <<https://file.go.gov.sg/nais2023.pdf>> (accessed 25 March 2026).

guidelines, assurance tools, and public education. Such an approach ensures that legislators retain some flexibility in relation to regulating online harms, as laws and regulations are frequently reviewed and updated to keep them “relevant and effective”,⁹⁶ and is likely to continue even as technology rapidly evolves.

IV. Conclusion

29 Amidst attempts to amend and refine legislative frameworks, it has been stressed that legislation is “not a panacea”,⁹⁷ and that ensuring online safety requires the involvement of every level of society. Indeed, even the OSRA Bill itself represents the product of significant consultation with various industry stakeholders.⁹⁸ Singapore’s evolving regulatory trajectory demonstrates a recognition that the challenges of the digital age cannot be addressed by legislation alone, and that the effectiveness of any regulatory framework will ultimately hinge on the active participation of all segments of society.

30 As Singapore continues to navigate the challenges and opportunities presented by emerging technologies, the aspiration must surely be for a future where innovation and connectivity are balanced alongside the values of inclusivity, empowerment, and safety. This journey towards a safer online ecosystem hinges on the continued collaboration of all stakeholders, and it is only through the sustained commitment of all parties involved that Singapore can go about securing a future that tempers innovation with accountability and social responsibility.

96 Singapore Parl Debates; Vol 5, Sitting No 75; [9 November 2022] (Josephine Teo, Minister for Communications and Information).

97 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).

98 Singapore Parl Debates; Vol 96, Sitting No 10; [5 November 2025] (Josephine Teo, Minister for Digital Development and Information).