

Reference: 02208510

Information Requests
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2 July 2026

Freedom of Information request: Right to know request

Thank you for your request for information about VPN Usage, Circumvention, Displacement Effects and Age-Assurance Requirements.

We received this request on 8 June 2026 and we have considered your request under the Freedom of Information Act 2000 (“the FOI Act”).

Your request

I am requesting copies of recorded information held by Ofcom relating to age-assurance requirements implemented under the Online Safety Act.

For the avoidance of doubt, I am primarily seeking the underlying evidence, data, methodology, analyses, assessments, reports, briefings, meeting minutes, presentations, statistical summaries, dashboards, datasets, and other recorded information used by Ofcom when evaluating these issues.

Where conclusions, assessments, findings, or public statements exist, I am requesting the underlying supporting material used to reach those conclusions, including methodology documents, technical notes, data sources, assumptions, caveats, limitations, internal reviews, and supporting analyses where held.

I am seeking recorded information rather than summaries, interpretations, or newly created explanations.

SECTION 1 – VPN USAGE

1.1 Documents relating to VPN usage following the implementation of age-assurance requirements.

1.2 Documents discussing increases or decreases in VPN usage associated with age-assurance requirements.

1.3 Documents containing estimates, measurements, datasets, or analysis of VPN usage connected to age-assurance implementation.

1.4 Documents assessing the impact of VPN usage on the effectiveness of age-assurance requirements.

SECTION 2 – CIRCUMVENTION

2.1 Documents relating to users bypassing age-assurance requirements.

2.2 Documents discussing methods used to circumvent age-assurance requirements.

- 2.3 Documents estimating the scale of circumvention associated with age-assurance requirements.*
- 2.4 Documents assessing the effect of circumvention on regulatory effectiveness.*
- 2.5 Documents discussing whether circumvention affects the reliability of effectiveness assessments.*

SECTION 3 – DISPLACEMENT TO OTHER SERVICES

- 3.1 Documents assessing whether users have migrated from regulated services to unregulated services.*
- 3.2 Documents assessing whether users have migrated to services outside the UK jurisdiction.*
- 3.3 Documents discussing changes in traffic or usage patterns following implementation of age-assurance requirements.*
- 3.4 Documents assessing whether observed reductions in activity on regulated services correspond with increases elsewhere.*
- 3.5 Documents discussing relocation or displacement of activity following implementation of age-assurance requirements.*

SECTION 4 – EFFECTIVENESS AND OUTCOMES

- 4.1 Documents assessing whether age-assurance requirements have reduced activity or merely displaced activity.*
- 4.2 Documents discussing alternative explanations for observed reductions in traffic or usage.*
- 4.3 Documents assessing whether reductions in activity reflect reduced access, reduced demand, migration to other services, VPN use, or other forms of circumvention.*
- 4.4 Documents discussing limitations, assumptions, uncertainties, weaknesses, or caveats relating to assessments of effectiveness.*

SECTION 5 – METHODOLOGY AND EVIDENCE

- 5.1 Documents describing methodologies used to assess the effectiveness of age-assurance requirements.*
- 5.2 Documents identifying data sources used when assessing effectiveness.*
- 5.3 Documents identifying metrics used to determine success or failure.*
- 5.4 Documents discussing confidence levels, uncertainties, assumptions, limitations, or weaknesses within the evidence base.*
- 5.5 Documents describing how Ofcom distinguishes between genuine reductions in activity and displacement of activity.*
- 5.6 Documents supporting public statements concerning the effectiveness of age-assurance requirements.*

SECTION 6 – INTERNAL ASSESSMENTS

- 6.1 Internal reports concerning VPN usage associated with age-assurance requirements.*

6.2 Internal assessments concerning circumvention of age-assurance requirements.

6.3 Internal assessments concerning migration to overseas, unregulated, or non-compliant services.

6.4 Internal assessments concerning unintended consequences arising from age-assurance requirements.

6.5 Internal assessments concerning risks, weaknesses, limitations, or challenges associated with evaluating effectiveness.

If any of the requested information is already publicly available, please provide links or references to the relevant publications.

If any requested conclusions, findings, or assessments rely upon underlying datasets, methodologies, technical notes, briefing papers, presentations, or supporting analyses, I request copies of those supporting materials where held.

I recognise that this request is detailed. However, the issues addressed are interconnected and cannot always be understood accurately through isolated statistics or summary statements alone.

The purpose of this request is to obtain the underlying evidence and supporting material necessary to form a fair, balanced, and evidence-based understanding of the real-world impact of age-assurance requirements.

Our response

In response to the information requested, we consider that this is exempt under section 12 of the FOI Act. Section 12 of the FOI Act provides that a public authority is not obliged to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the “appropriate limit”. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, and is, for Ofcom, £450, which is equivalent to 18-hours. That sum is intended to cover the estimated costs involved in determining whether Ofcom holds the information requested, identifying, locating, retrieving and extracting the information from any document containing it. The Regulations provide that costs are to be estimated at a rate of £25 per person per hour.

Age Assurance is a key responsibility within Ofcom’s online safety remit and is considered in many areas of Ofcom’s work. Therefore, in order to satisfy your request and provide the required information, we would need to consider a large amount of information from most teams across Ofcom, including, for example, our technology, economics and research teams, in addition to all teams within our Online Safety group. We would then need to extract the relevant information and consider whether any exemptions to disclosure apply. This would take us beyond the 18-hour limit of complying with a request.

You may wish to consider submitting a narrower, more focused request, for example, focussing on a specific aspect of Age Assurance. We would then consider this under the FOI Act. However, should you decide to make a further request for information, please note that the aforementioned appropriate limit and/or other exemptions may apply.

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).