

Reference: 02269751

Information Requests
information.requests@ofcom.org.uk

17 September 2026

Dear,

Freedom of Information request: Right to know request

Thank you for your request for information concerning evidence and stakeholder input behind age-assurance guidance.

We received this request on 19 August 2026 and we have considered your request under the Freedom of Information Act 2000 ("the FOI Act").

Your request

"For the period 1 December 2023 to 24 April 2025, please provide:

1. The final internal rights, privacy or data-protection risk assessment, and the relevant final risk-register entries, used when approving the highly effective age-assurance guidance. This should include recorded risks and mitigations concerning:

- adults being required to provide identity, facial/biometric, banking or credit data;*
- linkability or reuse of age-check results across services;*
- retention, security, data breaches and onward disclosure;*
- false acceptance or rejection, demographic bias and exclusion; and*
- interference with adults' access to lawful content.*

2. The final evidence assessment or decision record supporting Ofcom's conclusion that each method listed in its guidance was capable of being highly effective. Please include the evidence recorded on accuracy, false acceptance and rejection, spoofing or circumvention, and demographic performance for the methods assessed. I am seeking the decision-stage evidence record, not every underlying research paper.

3. A schedule of substantive meetings about the guidance between Ofcom's Age Assurance Policy Team and:

- a. the Information Commissioner's Office; and*
 - b. commercial age-assurance providers, their trade bodies, and testing or certification organisations.*
- For each meeting, please provide the date, participating organisations, purpose and any final minutes or action log. Routine administration and duplicate correspondence may be excluded.*

4. Any final decision log, issues table or equivalent record showing material changes made to the draft guidance following advice or representations from the ICO or the commercial age-assurance sector, including proposals that Ofcom rejected."

Our response

You may find Annex 2 of our [Statement on Age Assurance and Children's Access](#) useful. This contains the impact assessments we carried out in preparing the statement.

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.

A large number of employees across different teams at Ofcom have worked on matters relating to age assurance during the period specified in your request, and we therefore have a very large volume of related documents, emails and other materials. We have also had extensive correspondence and engagement with the ICO during this period. The scope of your request is very wide and would therefore require many different Ofcom colleagues who have worked on relevant workstreams to conduct extensive manual searches covering a period of more than 16 months through emails, messages, and other saved documents to identify any information within the scope of your request. We would then need to manually extract and review the relevant information, assess and identify any information that is relevant to the specific matters mentioned in your request, 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, covering for example, a much shorter time period and fewer specific areas. 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](#).