

Consultation response form

Consultation title	Guidance for service providers publishing pornographic content
Organisation name	OneID

Your response

Question	Your response
<p>Question 1: Do you agree with our proposed guidance on scope? If not, please provide any information or evidence in support of your views, including descriptions of services or content where you consider it is unclear whether they fall within the scope of Part 5.</p>	<p>Confidential? – N</p> <p>Yes, it is clear that provider-generated pornographic content is in scope of Part 5 (and that use-generated content is in scope for Part 3).</p> <p>Providers who supply both kinds of content will need to comply with both Parts 3 and 5.</p>
<p>Question 2: Do you have any comments on how our proposed guidance applies in respect of pornographic content created by generative-AI services within the scope of Part 5? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – N</p> <p>Generative AI is now at the stage that it can create content that is indistinguishable by humans from ‘real’ content. This type of content should therefore be subject to the same measures as real content.</p> <p>AI technology also brings new challenges, such as deep-fake content. Content provenance using technologies such as the open framework from the Coalition for Content Provenance and Authority (C2PA) may help providers to prove their content is not breaching other laws.</p>
<p>Question 3: Do you have any comments on our proposed guidance in respect of the kinds of age assurance which could be highly effective? If you consider there are other kinds of age assurance which have not been</p>	<p>Confidential? – N</p> <p>OneID is a supplier of a bank-based age verification service, that adds a certified ID layer to Open Banking. This is one of the highly effective methods of age assurance.</p>

Question	Your response
<p>listed that you consider could fulfil the proposed criteria, please identify these with any supporting information or evidence.</p>	<p>Age verification has an advantage over age estimation in that it can guarantee the exact age of the person accessing a service. Age estimation has a 'buffer zone' where users may be legally entitled to access a service, but do not appear old enough so are blocked by an estimation process; these users could legitimately pass an age verification.</p>
<p>Question 4: Do you agree that service providers should use the proposed criteria to determine whether the age assurance they implement which is highly effective at correctly determining whether or not a user is a child? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – N</p> <p>We believe that OneID (and Open Banking-based age verification) is highly effective at determining age, as per the ACCS report findings commissioned by the DRCF, to a 'strict' level of 99.99% accuracy.</p> <p>Banks are highly regulated to perform 'Know Your Customer (KYC)' checks on their customers under Anti-Money Laundering (AML) legislation, which includes checks on Date of Birth of their customers.</p> <p>OneID scores highly on all four of the criteria used:</p> <ul style="list-style-type: none"> • Technical accuracy – open banking scores 99.99% on accuracy. • Robustness – we use Strong Customer Authentication as a key component of our customer journey. SCA has been in use for many years now, and does not need specific environmental conditions to work effectively. • Reliability – OneID uses Google Cloud Platform as our technology provider, which gives us consistent reliability and failover when required. In addition, the bank SCA platforms that we connect to have enabled billions of log-ins so are proven to be reliable. In a worst-case scenario of a bank's online banking or app being inaccessible, most people now have a second account so could still use the OneID service via an alternative bank. • Fairness – OneID does not use face scanning; since it is just a data supply service there is no bias, everyone can access the service equally.

Question	Your response
<p>Question 5: Do you have any information or evidence on the extent of circumvention risk affecting different age assurance methods and/or on any steps that providers might take to manage different circumvention risks for different methods?</p>	<p>Confidential? – N</p> <p>Age verification is not subject to the risk of presentation attacks (where a child could present a photo or video to circumvent an age estimation process).</p> <p>Bank SCA has been proven to be an effective method of protecting bank accounts from account takeover; we reuse SCA to do age verification in a secure way which minimises any circumvention risk.</p>
<p>Question 6: Do you agree with our proposed guidance that providers should consider accessibility and interoperability when implementing age assurance? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – N</p> <p>We agree with the approach that online services should be accessible to all those who are eligible; so anyone over the age of 18 for adult services.</p> <p>OneID is more inclusive than document scanning as an age verification method; 90% of UK adults have online banking, vs. 87% having a passport and 75% having a driving licence.</p> <p>For interoperability, OneID uses the global open standard for ID data sharing; Open ID Connect. This is the same standard used by Open Banking. We also use the W3C standard of Verifiable Credentials, which enables onward-sharing of credentials that can be verified securely.</p>
<p>Question 7: Do you have comments on the illustrative case study we have set out in the guidance? Do you have any supporting information or evidence relating to additional examples of how the criteria and principles might apply to different age assurance processes?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 8: Do you agree with our proposed guidance on the record-keeping duties? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – N</p> <p>We agree that requiring a service provider to keep a written record of age assurance process and privacy is an appropriate measure that will aid clarity and auditability.</p> <p>We would work with providers as customers to ensure they can meet the record keeping requirement with accurate statements.</p>

Question	Your response
	<p>OneID enables privacy-enhancing access to online services by adhering to GDPR data minimisation principles; only an 'age over 18' flag is shared with the provider, not the actual date of birth or any other data. In the event of a provider data breach, no personal data is therefore put at risk.</p>
<p>Question 9: Do you have any comments on our proposed approach to assessing compliance with the duties on service providers who publish or display pornographic content, including on the proposed examples of non-compliance? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 10: Do you have any comments on the impact assessment set out in Annex 1? Please provide any information or evidence in support of your views</p>	<p>Confidential? – N</p> <p>We consider the impact on service providers of implementing age assurance technology to be proportionate with the risk of under-age users accessing the content.</p> <p>OneID is designed to be a high-volume, low-cost service that can serve the age verification market in an affordable way, to increase online safety for everyone.</p>
<p>Question 11: Do you agree that our proposed guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English?</p> <p>If you disagree, please explain why, including how you consider the proposed guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	<p>Confidential? – N</p> <p>No comment</p>

Please complete this form in full and return to Part5Guidance@ofcom.org.uk.