

The Age Check Certification Scheme

We truly appreciate the hard work and time that went into this and would like to put on record our support for the guidance on setting out a non-exhaustive list of the different age assurance methods that could be highly effective at correctly determining whether or not a user is a child. We strongly agree that service providers should implement an age assurance process that meets the criteria set out, including fairness, accuracy and reliability to ensure this highly effective determination of age.

In terms of Q4 of the Consultation, we'd like to disagree that there is not 'sufficient evidence as to the effectiveness and potential risks of different age assurance methods to recommend specific metrics for assessing whether or not any given age assurance method or process should be considered highly effective.' In 2023, our Measurement of Age Assurance Technologies Research Report, commissioned by the ICO and Ofcom, was published, which focused on Current and short-term capability of a range of Age Assurance measures, including looking at the state of the art. We feel as if not mentioning this in our response would be remiss.

Thank you once again for allowing us to put our response on record.