

RESPONSES TO CONSULTATION

PROTECTING CHILDREN

FROM HARMS ONLINE

Services Likely to be access by children

Non-Designated Content (NDC)

Safety Duties

Body image and Depressing content presenting significant risk...

General Notes

Responses are as follows my *additions are in italic and in red ink.*

Stage 1: Is it possible for children to access the service or part of it?

Under the Online Safety Act, 'children' means anyone under 18.

You can only conclude that it is not possible for children to access your service if you are using age verification or age estimation (together known as age assurance), which prevents children from normally being able to access that service.

The age assurance should be highly effective. By 'highly effective' we mean it must be:

technically accurate

robust

reliable

fair.

Precise and authentic

Examples of age assurance methods that have the potential to meet the above criteria include:

photo-ID matching

facial age estimation

reusable digital identity services.

Parental Approval or waiver clicks (A child should be able to discuss with their parent whose account may be linked to theirs to approve to usability of certain features on a platforms)

Guidance on age assurance and other Part 5 duties for service providers publishing pornographic content on online services.

Summary of service providers' Part 5 duties

- Implement age assurance, for example using one or more of the methods listed in Section 4 of

the guidance.

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- Keep an easily understandable written record of:
 - the kinds of age assurance used and how they are used by the service provider or a third-party age assurance provider.

Ensure Parental Approval options are available on navigation for children to have the easy option of seeking approval from parent to access new material, packs or social contents especially where phone and apps are paired.

What service providers should do to support compliance with their duties?

+ Ensure the age assurance process implemented fulfils the criteria of technical accuracy,

robustness, reliability and fairness.

+ Consider the principles of accessibility and interoperability when implementing age assurance.

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circumvent the age assurance process or access controls.

Create transparent options that enhance their duty enforcement mechanisms for effective compliance.

For instance, Create options for children to report unsolicited content to parents (e.g. Report this content to your Parents)

Effective use of Technology such as Algorithms to flag suspected underage usage.

What does “published or displayed by the provider on its internet service” mean?

The duties in Part 5 apply where pornographic content is published or displayed by a provider of an internet service (or on behalf of such a provider) on that internet service.

...

service, unless the service in question is a user-to-user service or a search service.

Service Providers to ensure they ‘unleash’ all technological mechanisms and apparatus such as algorithms prevent them from offering pornographic content to children and that they prevent users on their platform from doing same.

Which services are outside the scope of Part 5 or exempt?

3.15 There are certain types of services which fall outside the scope of Part 5. As noted above,

user-generated content on a user-to-user service (or combined service) and the search results on a search service (or combined service), are outside the scope of Part 5 and instead.

are regulated under the provisions of Part 3 of the Act.

To ensure that all Pornographic content is not circulated in such a way that they become accessible to children, regardless of where the service is registered.

4.The age assurance duties

Introduction to the age assurance duties

4.1 The Act imposes the following core duties relating to age assurance on service providers in

scope of Part 5

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4.2 Throughout this guidance, we refer to the duties in paragraph 4.1 as the ‘age assurance.

duties.’ The effect of these duties is to require service providers within scope of Part 5 to

deploy age assurance which is highly effective at determining whether or not a user is a

Install mechanisms that assures and verifies the age of a child consequently prevents them from accessing pornographic content without first verifying their age.

Kinds of age assurance

4.11 Below, we set out a non-exhaustive list of kinds of age assurance that we consider could be.

highly effective at correctly determining whether or not a user is a child. We recognise. effective at correctly determining whether or not a user is a child. Where a service provider...

Kinds of age assurance that could be highly effective.

4.15 Open banking. This works by accessing the information a bank has on record regarding a

user’s age, with the user’s consent. Confirmation of whether or not the user is over 18 is shared with the relying party.

24 The user’s date of birth is not share.

No Childs Data is to be collected for the purpose of using Social media, all devices are presumed to be registered on a chip and the age at the point of registration is to be used. Providers to ensure that another problem is not created whilst trying to solve an existing one.

Criteria Practical steps to fulfil criteria Technical accuracy: the degree to which an age assurance method can correctly determine the age of a user under test lab conditions. Ensure the age assurance method(s) has been evaluated against appropriate metrics. Include details of the performance of the method(s) against the metrics in the written record (see Section 5 below). Consider implementing a ‘challenge age’ approach for age estimation methods (see box under paragraph 4.38 below). Robustness: the degree to which an age assurance method can correctly determine the age of a user in unexpected or real-world conditions. Implement age assurance processes that have undergone tests in multiple environments during development. Include details of this test process in the written record (see Section 5 below). Take steps to mitigate against methods of circumvention that are easily accessible to children and where it is reasonable to assume that children may use them.

Criteria	Practical Step to fulfil criteria.
<p>Technical accuracy: the degree to which an age assurance method can correctly determine the age of a user under test lab conditions</p>	<p>Ensure the age assurance method(s) has been evaluated against appropriate metrics...</p>
<p>Robustness: the degree to Which... engage assurance</p> <p>Reliability: the degree to which the age output from an age assurance method is reproducible and derived. from trustworthy evidence.</p> <p>Fairness: the extent to which an age</p>	<p><i>Service providers to collaborated with mobile companies to identify children registered chip or devices for easy notification and for protection when access is made to pornographic site or content with a child registered device.</i></p> <p><i>Ensure option for parental Intervention option is provided via an icon.</i></p> <p><i>Parental intervention to be added as an option.</i></p> <p><i>Work in collaboration with telecommunication</i></p>

<p>assurance method avoids bias or discriminatory outcomes.</p>	<p><i>companies and focus only on children registered devices and not as an excuse to interfere with adult registered devices.</i></p> <p><i>Parents and guardians to ensure when children take devices from them they can only accesses a child area on the device.</i></p> <p><i>Device produces to ensure that future devices have a child accessible section.</i></p>
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How can service providers have regard to technical accuracy when implementing?

age assurance?

Ensure the method(s) has been evaluated against appropriate metrics.

4.32 We expect service providers to evidence that they have taken steps to understand how.

technically accurate the age assurance method(s) they use is.

4.33 To understand the technical accuracy of an age assurance method, service providers should.

ensure it has been evaluated against appropriate metric.

service provides could consider collaborating with Mobile devices and telecommunication providers (and on long term basis device producers. And to effectively ascertain age via mobile number registration. Parents to be allowed to Register their children's age at point of chip purchase or registration, for reliable age assurance indication consequently effectively solving the challenge of technical accuracy together with associated issues.

A 'challenge age' approach is widely used offline when selling age-restricted products in

retail environments, for example through the retailing strategy 'Challenge 25.'

Service Provided could introduce 'Parental Navigation' in place of Challenge 25 Parental Navigation is hereby propounded to mean an Online flag system wherein connected social media apps between parent and child for parent to determine harmfulness or proportionality of same for the purpose of the child's social media consumption.

Why is robustness important?

4.42 Conditions in the real-world will vary considerably to those in a test scenario.

4.43 If the age assurance method is not robust, there are likely to be discrepancies in how it.

Service provides and or Ofcom could explore more Parental guidance features for approval of content as an option or addition to explanation on robustness rather than only identification via identity cards upload. This can help service providers have regard to robustness when implementing age assurance.

Interoperability

What is interoperability?

4.81 Interoperability describes the ability for technological systems to communicate with each... *This may include flagging a parent or a guardian on the need to intervene the current activity online of their, child this will only apply to children under 18.*

other using common and standardised formats. It relies on consistent technological.

approaches being adopted across different methods. Standards, technical frameworks and

other specifications are important to achieving interoperability.

Illustrative case study

High-Level User Journey

Service provider considerations

On accessing the regulated pornography service, a pop-up asks the user to confirm their age. The service provider has ensured content is not visible prior to verifying the age of the user, to ensure children are not normally able to encounter pornographic content. It designs a pop-up box for the age assurance process that appears as a new, smaller window overlaid on top of the webpage that the user is viewing.

Again for this section service provider consideration could flag the parent of the child with a pop up to approve content as it should been viewed that when a child is on social media or on online platforms they ordinarily should be with a guide and whilst parent can not always be with them the adult or gate keeper connected to the device being used is to be flagged.