

Vet Your Vendor

A resource to help services conduct due diligence on their age assurance providers

If you use a third-party age assurance vendor, Ofcom expects you to conduct regular due diligence on them. Ultimately it is your responsibility as the service provider to ensure that your age assurance process as a whole is highly effective.

To support your due diligence we have created this non-exhaustive list of questions primarily based on the areas for improvements identified in our [Age Assurance Report](#).

Testing

Questions to understand what tests have been conducted and what metrics are used to measure results.

Questions to ask

Answer

Which metrics do you collect and measure against to evidence that your solution meets each of Ofcom's highly effective age assurance (HEAA) criteria?

Explain how you test and evaluate your solution's performance, and how often this testing is conducted.

How do you communicate the outcomes of your testing and flag any issues to me (the regulated service)?

Notes on follow-up questions and planned future actions

Circumvention by children

Questions to help you ensure that risks of circumvention by children have been considered, and appropriate steps taken.

Questions to ask

Answer

What circumvention risks have you identified that are easily accessible to children?

What steps have you taken to address identified circumvention risks and what evidence do you have that this is mitigating the risks?

Notes on follow-up questions and planned future actions

Appeals

Questions to explore if the vendor has a robust appeals process, and how they monitor appeal metrics.

Questions to ask

Answer

How are users able to appeal the result of an age check?

How do you monitor relevant metrics about appeals? This may include appeal rates, appeals upheld, time taken to make appeal determinations, and accuracy of decision making.

How do you communicate these appeal metrics and flag any issues to me (the regulated service)?

Notes on follow-up questions and planned future actions

Standards and certification

Question to explore whether the vendor has achieved certification against relevant schemes or standards. While this is not an automatic means of compliance, it may help to demonstrate regard to Ofcom's HEAA criteria.

Questions to ask

Answer

Is your method certified against or does it conform to/meet a particular standard or scheme, such as the UK Digital Verification Services Trust Framework or ISO/IEC 27566-1:2025?

Notes on follow-up questions and planned future actions

Method-specific questions

If the vendor offers age estimation, ensure a challenge age approach or equally effective alternative is used.

If the vendor offers facial age estimation and/or photo-ID matching, ensure liveness detection is deployed.

Questions to ask

Answer

Does your solution include a challenge age approach?

If not, can you demonstrate an alternative mechanism equally as effective as a challenge age at reducing the likelihood of false positives (children incorrectly classified as adults)?

Questions to ask

Answer

Does your solution include liveness detection?

Notes on follow-up questions and planned future actions

See our [highly effective age assurance \(HEAA\) guidance for Part 3](#) and [Part 5 services](#), which explains relevant terms and is designed to assist you in meeting your obligations when implementing HEAA.

You must implement HEAA in a way which complies with data protection law. This includes ensuring appropriate accountability and governance arrangements are in place. For more information, see the ICO's guidance on [UK GDPR](#), including on [controllers and processors](#).