

# Organisational approaches to age assurance in the UK: Technical annex

April 2024



# Sector summary

Summary Sectors	Sector
SUMMARY: Educational	Educational (18+ users)
	Educational products and online learning materials
	Education technology
SUMMARY: Entertainment & Leisure products and services	Live events and sports tickets
	Health and fitness services
SUMMARY: Financial	Financial
SUMMARY: Gambling	Gambling
SUMMARY: Music and video streaming	Music and video streaming 18+
	Music and video streaming
SUMMARY: News & Media	Magazines, books, and media
	News / education websites / subscription services
SUMMARY: Online dating	Online dating
SUMMARY: Online gaming**	Online gaming / streaming of games with a PEGI rating or equivalent of 18+
	Games with a PEGI rating or equivalent of 18+
	Online gaming / streaming
SUMMARY: Retail products & services	Alcohol
	Games devices (including consoles) and connected toys
	Computer software
	Food and consumer goods
	Online marketplace for third party goods/services
	Electronic services controlling connected toys and other connected devices
SUMMARY: Social media	Social media 18+
	Social media services
SUMMARY: Telephony	Phones and communication devices
	Online messaging or voice telephony service

# Age assurance definitions provided to respondents (1)

Method	Definition
<b>Self-declaration</b>	The age claimed by a person with no requirement to provide any evidence to confirm it. This may be provided as a date of birth or as a confirmation tick box that the user indicates to state they are over a certain age.
<b>Family account holder confirmation</b>	Linking the personal information of the main account holder (usually someone with parental responsibility) to the confirmed account holder (usually a child). In a family account, the main account holder can confirm the age of the people using the other account profiles. The service can then be applied in an age-appropriate way to each user.
<b>Mobile network operator (MNO) 18+ content restriction filter</b>	Allows the account holder of the mobile device to place an 18+ content restriction filter on the device.
<b>Credit Card</b>	Credit cards can only be issued to those over the age of 18 in the UK, and so electronic checks using credit card information can be used to confirm whether the card holder is an adult.
<b>Debit Card</b>	A bank account can be opened from 11 years old, and electronic checks via debit card information can be used for age verification purposes.
<b>Open banking</b>	Allows users to access their online banking apps to progress through an age assurance check. Similar to the debit or credit card checks, this uses electronic checks via banking information, but doesn't require the user to input any card details.
<b>Photo identification</b>	Requires the upload of a hard identifier, such as a driving license or passport. The user then takes a live photo of their face which is matched by the technology to the image on the hard identifier.

# Age assurance definitions provided to respondents (2)

Method	Definition
<b>Third party databases</b>	Uses the data held by third party databases, the most common of which is credit reference agencies, but also includes the electoral roll and other sources. These databases hold people's date of birth, and so can be used to verify age.
<b>Biometric estimation through facial analysis</b>	Uses computer vision and machine learning technology to estimate age based on an analysis of patterns in an image of their face.
<b>Biometric estimation through voice analysis</b>	Estimates age via pitch, tone and patterns of voice.
<b>On-Platform behavioural inference</b>	Uses information derived from a person's activity on social media and other platforms to estimate their age.
<b>Digital footprint:</b>	Looks at a person's online accounts, across many different sites, gathering various data points. The process requires a person's email address or mobile phone number, and then analyses the online accounts to which they are linked and uses machine-learning algorithms to estimate age or age-range.
<b>Reusable digital identity wallet</b>	Enable users to verify and securely store their attributes, such as age, in a digital format. This verification may take place using a variety of methods, but once their identity or an attribute of their identity has been verified and stored in the wallet, a user may choose to share individual attributes, such as their age, or their status as an adult, with a relying party.



# Breakdowns by sector





# Age assurance methods used by sector

Method	% of those who use age assurance measures	Educational (N=11)	Entertainment & Leisure products and services (N=27)	Financial (N=22)	News and Media (N=2)	Telephony (N=6)	Gambling (N=3)	Online gaming (N=11)	Online dating (N=3)	Social media (N=13)	Retail products & services (N=38)	Music and video streaming (N=8)
Self declaration	53%	5	13	16	1	4	2	6	2	6	19	4
Payment card (credit card)	38%	5	7	11	-	2	-	5	1	7	17	2
Payment card (debit card or other)	38%	6	11	10	-	-	2	6	1	5	12	4
Photo identification biometric matching	28%	2	6	6	1	5	2	2	-	4	11	3
Family account holder confirmation	18%	1	7	6	-	2	-	3	-	1	5	1
Third party databases	12%	2	1	4	-	1	2	3	-	1	2	3
Digital footprint	11%	-	5	3	-	2	-	1	1	1	3	1
Mobile Network Operator (MNO) 18+ content restriction filter	11%	-	2	3	-	2	-	3	-	2	3	1
Open banking	10%	-	4	5	-	1	-	2	-	1	3	1
On-platform behavioural inference	6%	-	2	1	-	-	1	1	1	2	3	-
Reusable digital identity wallet	6%	-	1	3	-	1	-	1	-	2	2	1
Other ID verification method	4%	-	1	1	1	1	-	1	-	2	-	-
Biometric estimation through facial analysis	2%	-	-	-	-	1	-	-	1	1	1	-
Unspecified AI software	1%	-	-	-	-	-	-	-	-	-	-	-

⚠ Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures.


B4- Which of the following (if any) age assurance methods does your organisation use to determine the age or age range of its users and, if used, at what point during the user journey is this method employed? (All who use age assurance methods or are unsure if they do: 173). This was a multiple-choice question; percentages will sum to more than 100%.

# Self-declaration: stage implemented

User Journey	 Accessing website	 Setting up account	 Purchasing age restricted products /services	 If another method fails
All sectors	37%	48%	19%	3%
Gambling (n=2)	-	2	-	-
Online gaming (n=7)	3	5	-	-
Online dating (n=2)	-	2	-	-
Retail products and services (n=28)	14	7	4	1
Social media (n=7)	2	1	4	-
Music / video streaming platforms (N=6)	2	3	1	-





Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures. 

Organisations commonly reported implementing self-declaration when the user **sets up an account** (48%) or when the user **first accesses the website** (37%).

However, in comparison to other sectors the **retail products and services** sector seemed to favour self-declaration **when the user first accesses the website.** 

B4- Which of the following (if any) age assurance methods does your organisation use to determine the age or age range of its users and, if used, at what point during the user journey is this method employed? (All who use self-declaration or are unsure if they do: 126) Number of organisations in each sector who use self-declaration indicated in brackets in table. This was a multiple-choice question; percentages will sum to more than 100%.

# Payment card: stage implemented

User Journey	 Accessing website	 Setting up account	 Purchasing age restricted products /services	 If another method fails
All sectors	14%	31%	38%	2%
Gambling (n=0)	-	-	-	-
Online gaming (n=5)	1	4	1	-
Online dating (n=1)	-	-	1	-
Retail products and services (n=25)	4	8	12	1
Social media (n=7)	3	3	3	-
Music / video streaming platforms (n=4)	-	-	2	-





Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures.



Expectedly, organisations most frequently implemented this measure when the user **purchases age restricted products and services (38%)** or when the user **sets up an account (31%)**.



# Family account holder confirmation : stage implemented

User Journey	 Accessing website	 Setting up account	 Purchasing age restricted products /services	 If another method fails
All sectors	16%	25%	18%	6%
Gambling (n=0)	-	-	-	-
Online gaming (n=4)	1	3	1	1
Online dating (n=0)	-	-	-	-
Retail products and services (n=19)	2	4	4	2
Social media (n=2)	1	-	1	-
Music / video streaming platforms (n=3)	-	1	-	-





Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures.



Organisations most commonly reported implementing this measure when the user **sets up an account** (25%) and when they **purchase age restricted products and services** (18%).

B4- Which of the following (if any) age assurance methods does your organisation use to determine the age or age range of its users and, if used, at what point during the user journey is this method employed? (All who use Family account holder confirmation or are unsure if they do: 89). Number of organisations in each sector who use family account holder confirmation indicated in brackets in table. This was a multiple-choice question; percentages will sum to more than 100%.

# Photo identification biometric matching: stage implemented

User Journey	 Accessing website	 Setting up account	 Purchasing age restricted products /services	 If another method fails
All sectors	14%	26%	17%	8%
Gambling (n=2)	-	1	1	-
Online gaming (n=3)	1	2	1	1
Online dating (n=0)	-	-	-	-
Retail products and services (n=24)	3	6	3	1
Social media (n=5)	1	2	1	1
Music / video streaming platforms (n=4)	1	2	2	1

Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures.




Organisations reported most frequently implementing this measure when the user **sets up an account** (26%) and when they **purchase age restricted products or services** (17%).

B4- Which of the following (if any) age assurance methods does your organisation use to determine the age or age range of its users and, if used, at what point during the user journey is this method employed? (All who use Photo identification biometric matching or are unsure if they do: 102). Number of organisations in each sector who use photo identification biometric matching indicated in brackets in table. This was a multiple-choice question; percentages will sum to more than 100%.

# Age assurance: barriers of implementation (sector)





Barrier	Educational	Entertainment & Leisure products and services	Financial	Gambling	Music & video streaming	News & Media	Online gaming	Retail products & services	Telephony
Content/services are suitable for all ages	3	3	3	-	1	3	-	5	-
Didn't know that we should	3	-	1	-	-	1	-	6	1
Cost of setting up	1	-	-	-	1	-	1	5	-
Unsure how to implement	1	-	-	-	-	-	-	2	1
Other similar service providers don't use them	-	-	-	-	1	-	-	4	-
To limit collection of personal data	-	-	-	-	-	-	-	2	-
Cost of carrying out	-	-	-	-	-	-	1	2	-
Don't want to deter service users	-	-	-	-	-	-	-	1	-
Content / Services not accessed by anyone underage	1	-	1	1	-	-	-	1	-
Content accessed via a third party	-	-	-	-	-	-	-	1	-


Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures. 

# Other breakdowns




# Age assurance by user journey

Age assurance measure	 Accessing website	 Setting up account	 Purchasing age restricted products /services	 If another method fails
<b>Total</b>	<b>87</b>	<b>110</b>	<b>85</b>	<b>26</b>
Self-declaration	60	77	54	16
Family account holder confirmation	23	26	23	8
Mobile Network Operator (MNO) 18+ content restriction filter	14	15	13	5
Payment card (credit card)	39	52	47	9
Payment card (debit card or other)	38	56	51	13
Open banking	7	15	13	6
Photo identification biometric matching	24	37	31	13
Third party databases	8	18	15	4
Biometric estimation through facial analysis	1	4	2	3
On-platform behavioural inference	8	10	8	6
Digital footprint	12	17	10	8
Reusable digital identity wallet	5	10	9	3
Unspecified AI software	1	1	1	-
Other ID verification methods	3	7	4	3
Other AA	3	2	2	2

 Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures.

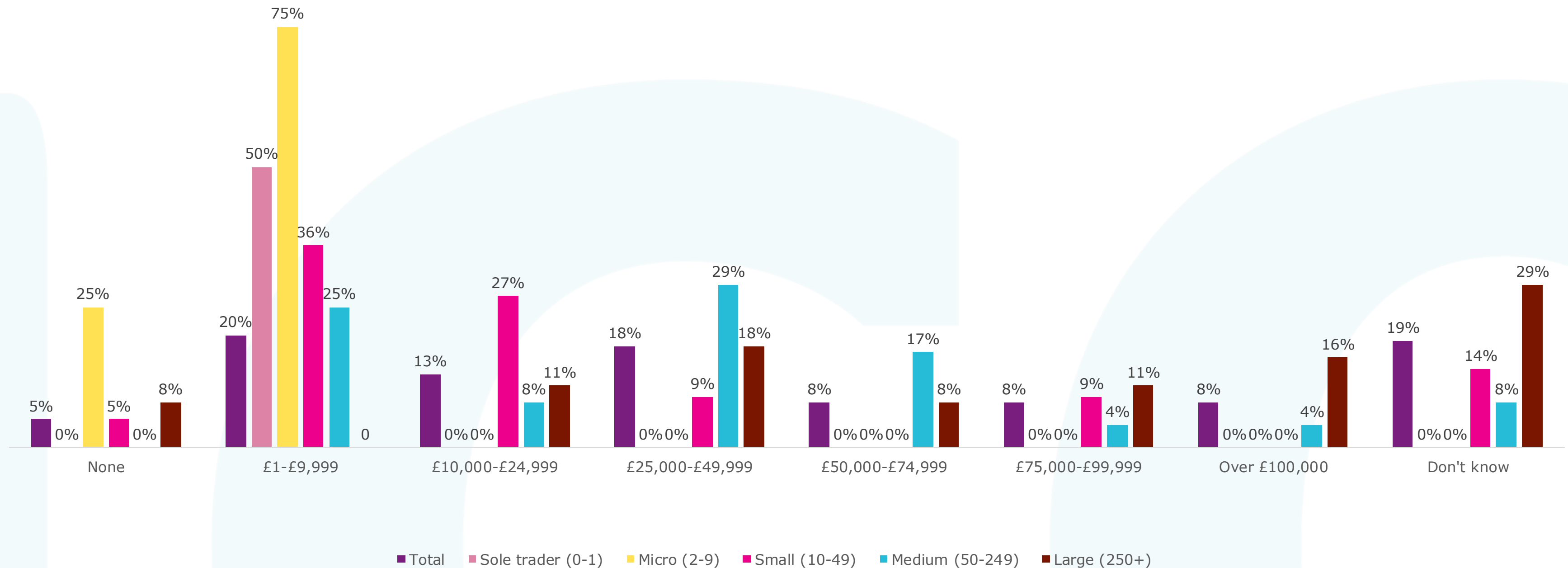
# Age Assurance: those who don't use any age assurance method

Why organisation does not have any other systems or processes in place to protect children's data online (multiple-code)	We don't process personal data	We do not believe our product(s) and/or service(s) are in scope of the Children's Code	Don't know
Education	4	2	-
Entertainment & Leisure products and services	1	2	-
Financial	4	2	-
Gambling	1	1	-
Music and video streaming	-	1	1
News & Media	2	-	-
Online gaming	-	1	-
Retail products & services	6	9	1
Telephony	1	-	1

 Due to the small subgroup bases, caution should be taken when drawing conclusions from these figures.

# Age Assurance: cost of implementation

Approximate financial cost of implementing age assurance methods for organisation since implementation by size of organisation



# Data activities (processing risk)

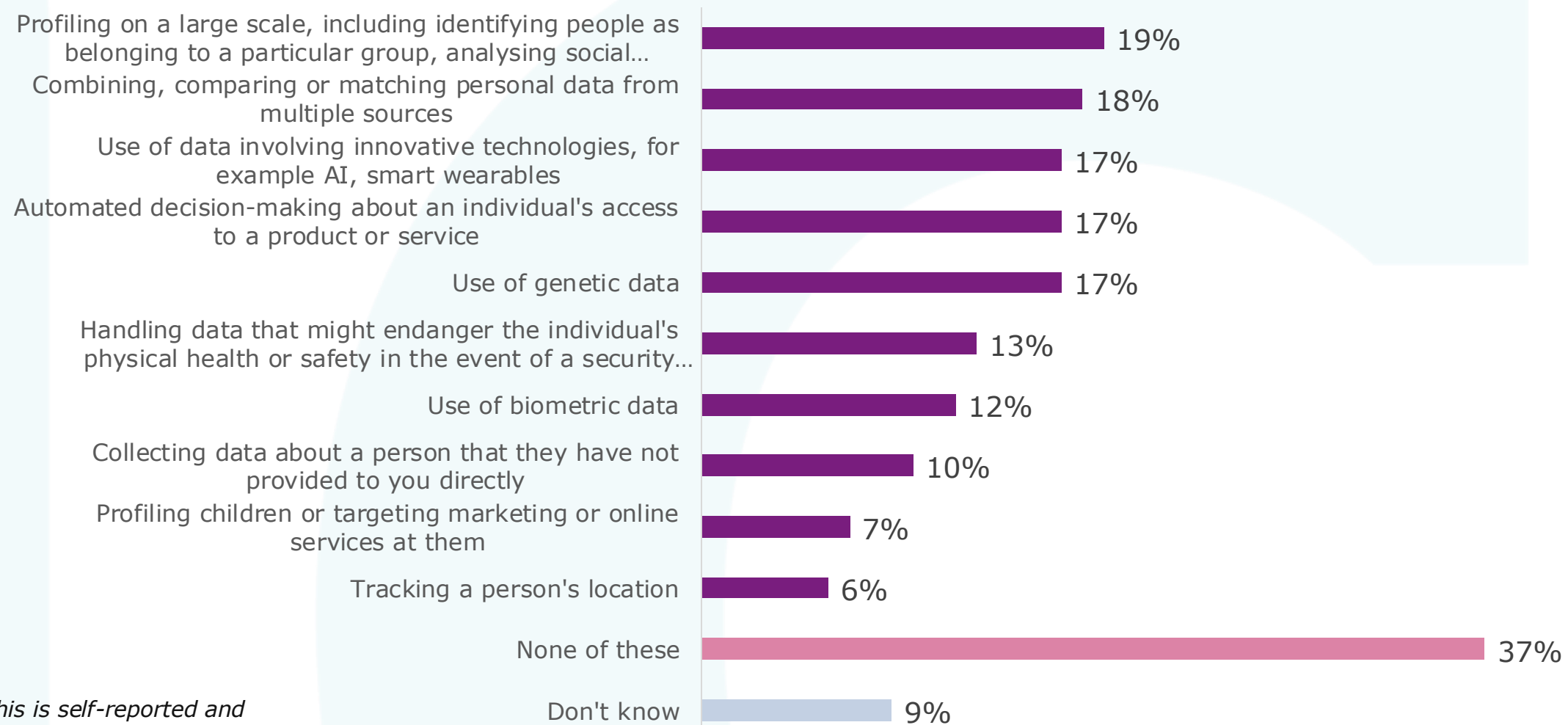


# Data activities

**Over half (55%)** of all organisations performed at least one of the below data activities. Those who **used age assurance measures** were **more likely** to have performed any of the data activities (67% vs 39% those without age assurance measures), as were:

- Those **aware of the ICO and its work** (67% versus 35% unaware of the ICO)
- Those **aware of the Children's Code** (62% versus 40% unaware of the Code)
- Those who had **conducted a data protection impact assessment** (71% versus 37% those who had not)
- Those **targeting users under 13** (72% versus 44% of those only targeting over 18 users)
- Those with **plans to implement age assurance** methods in the future (90% versus 50% of those without plans)

## Data activities performed\*

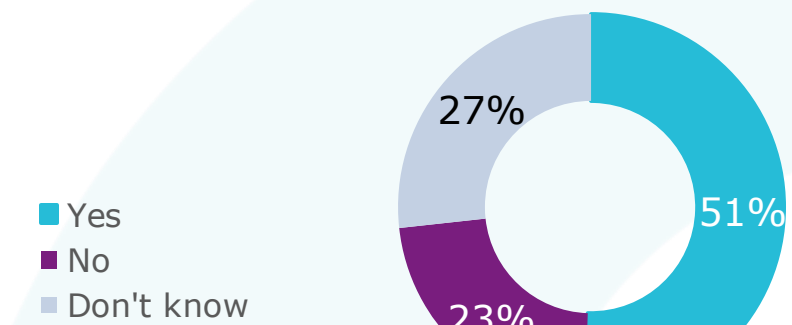


\* Note that this is self-reported and may not be fully reliable.

B1- Does your organisation perform any of the following data activities? (All organisations: 235). This was a multiple-choice question; percentages will sum to more than 100%.

B2- To the best of your knowledge, has your organisation conducted a data protection impact assessment in the past? (All organisations: 235)

## Whether organisation has conducted data protection impact assessment



**Just over half (51%)** of all organisations said they had performed a data protection impact assessment.

Those who had **age assurance methods in place** and those **aware of the children's code** were **more likely** to say they had performed an assessment (68% and 64% respectively).

**Over a quarter** of all organisations said they did not know if they had.

# ICO materials

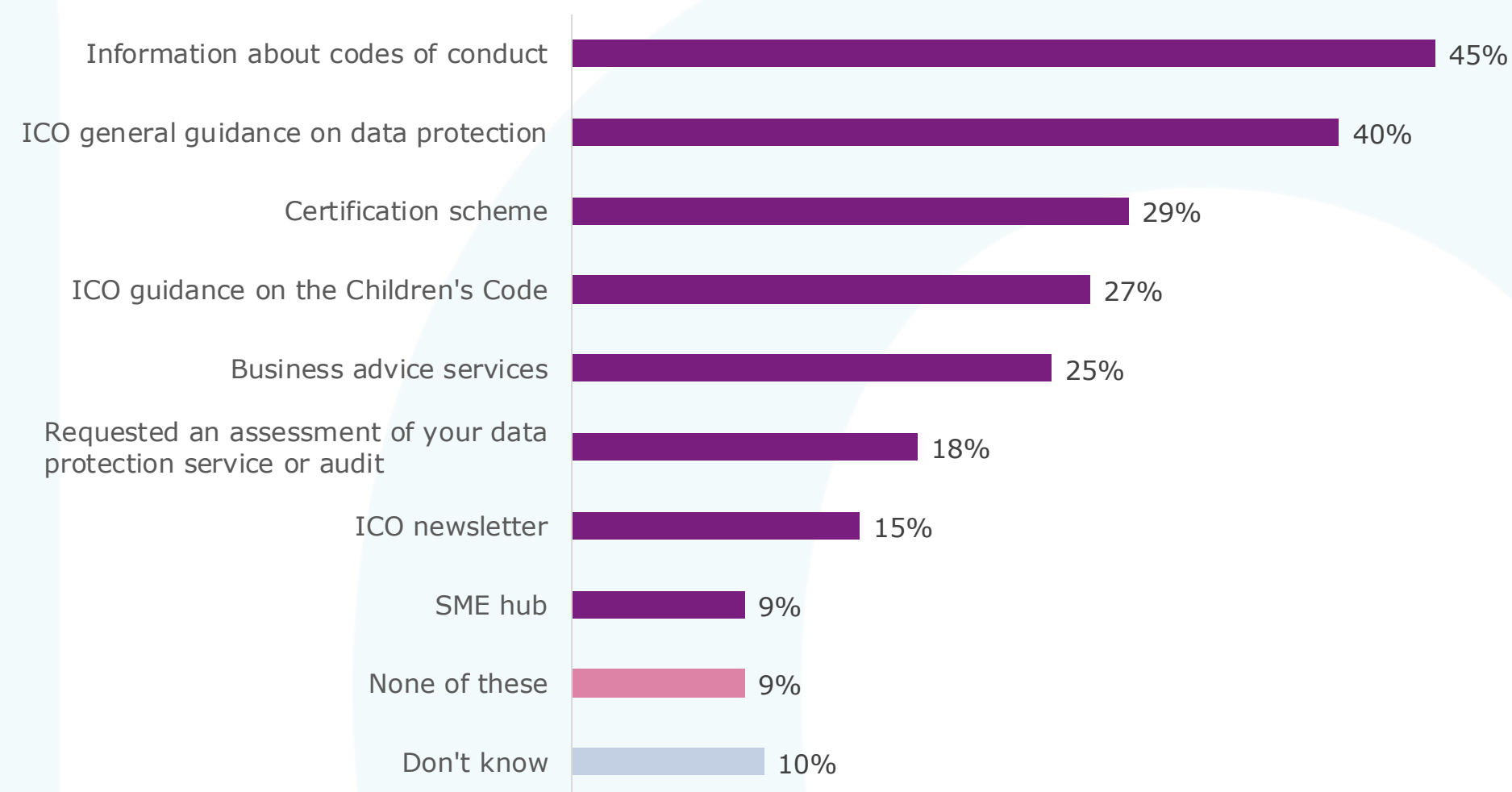
# ICO Impact: ICO materials

A **variety** of ICO services and materials were stated as being used, with the most common being **information about codes of conduct** and ICO's **general guidance on data protection**.

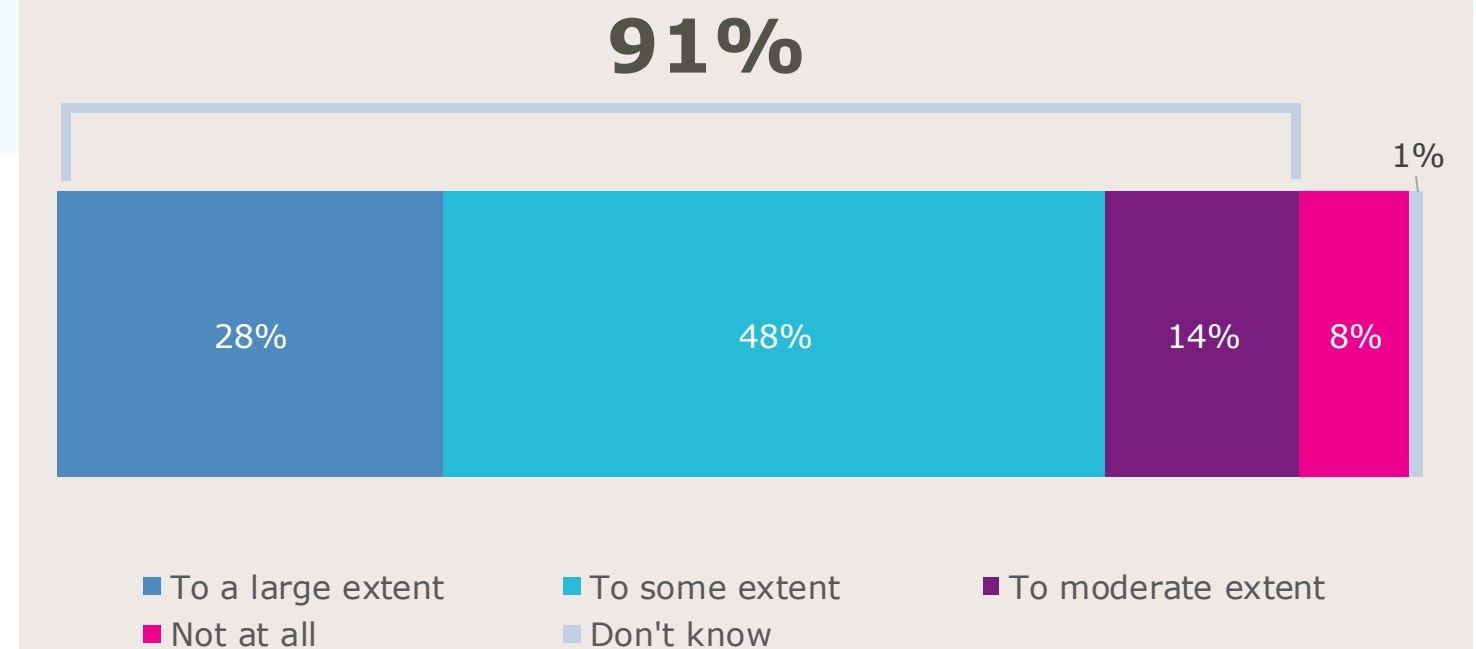
For most of the materials and services, **those who had age assurance methods in place** were **more likely** to report using them (for example, 55% of those with age assurance methods in place report using information about codes of conduct compared to 45% overall).

The **vast majority** of those who had used ICO materials and services said these **impacted their selection of age assurance methods** to at least a moderate extent (91%).

ICO material or services used



Extent to which ICO material or services impacted selection of appropriate age assurance methods



E3- Which of the following ICO material or services has your business/organisation used? (All who are aware of the ICO and its work: 121) This was a multiple-choice question; percentages will sum to more than 100%.  
 E4- To what extent have ICO material or services impacted your organisations selection of appropriate age assurance methods or your decision not to use any age assurance methods? (Base: All who have used any ICO materials or services: 99)



# Qualitative research case studies

All participants in the qualitative stage have provided permission for quotations from their discussion to be published



# Case Study 1

- The organisation uses:
  1. **Self-declaration** (entering D.O.B when user sets up account).
  2. **Biometric estimation through facial analysis** (automated for everyone, manual checks for suspicious profiles).
  3. **On platform behavioral inference** (in the background, consulted if user profiles become suspicious)
- The main factors in age assurance decision making are **cost** and **user experience**.
- They are considering implementation of **photo identification biometric matching**, where automated checks of passports / driving licenses would be part of the setting up of a user account.
- While they would like to see this implemented, there is tension in the organisation, as implementation of new age assurance methods is **tough to justify from a financial perspective**.
- This organisation thinks the only way they and other dating apps would seriously consider implementing more watertight measures is for **photo ID verification to be made mandatory**.

*"We know that [methods other than self-declaration] are probably a true representation of what the user's information is based on compared to what they have told us it is, especially if it's also been cross checked on other databases and you know you've done the credit card, debit card one and that matches with what's on the database versus what they've decided to tell us on our platform."*

*"People are very conscious... 'I'm on a dating app here and I want to sort of put my best photos online'. And then you're suddenly asking for a selfie of them out of nowhere. They might just be in a dressing gown or something and think 'is there a risk that this is going to be put on my profile?'. When actually it's literally just for a verification and it's going to be stored deep in the data vaults and stuff. No other users ever going to see it."*

*"[When introducing new measures] there's no upside. It's only preventing downside, if that makes sense. You could guarantee that you will turn away a percentage of people because they don't want to dig out their passports or you're turning away a percentage of people who are slipping through the net. I think if we were to introduce [photo identification biometric matching], it would only be because they see the risk of falling foul of some sort of compliance complaint or something like that."*

*"The more business-minded and financial results-minded element of leadership is saying 'you know every time we introduce one of these new measures, we see our results take a hit' and you know it's very expensive. We can't afford it."*



# Case Study 2

- The organisation uses:
  1. **Self-declaration** (when user sets up account).
  2. **Payment cards** (as organisation is a subscription service all users enter this).
  3. **Digital footprint** (information exchange with other major tech corporations)
- The main factors in age assurance decision making are **cost** and **user experience**.
- **Self-declaration is seen as very weak**, but it is an industry standard and easy to implement.
- The main commercial benefit of using age assurance measures is that they can **target content to more people**, whilst knowing the users are protected and the company is **compliant**. As they are able to release more content, they can then charge production houses higher fees, **raising revenue**.
- But there is also a user-end benefit too, in that they are **better able to curate and tailor recommendations** for what to watch.
- The **main barrier** to implementation of new measures is their **set-up cost**, which may be passed on to consumer. The respondent thinks **legislative action** is required to improve the situation.

*"Previously without having these age assurance methods, you're almost sort of reducing the content or the products that cater to certain categories [of users]. And you're trying to play it safe. Whereas once you have these age assurance methods in place, you can diversify your selection, you can cater to a lot of customer segments out there... You're also able to track customer activity and provide them better recommendations, give them better suggestions on what they'd like."*

*"I'm not sure if these tech improvements would come at the cost of [higher] subscriptions prices which is not ideal for the consumers, so it needs to be integrated seamlessly and in a way that becomes the norm. It will involve some sort of mandate from a public policy standpoint. And then companies can try to understand how to implement it. What is the cost structure involved? Do they pass it on to the customers or can they absorb that cost? Can they reflect that in some other service that they provide?"*



# Case Study 3

- The organisation uses:
  - **Self-declaration** (within Ts&Cs when user sets up account).
  - **Web3\*** guarantees privacy for an individual user's data
  - **Content moderation** (engine implemented to flag NSFW content)
- As their app is focused on sport, they do not see the need to implement further measures at the current time, as their content is suitable for all ages
- However, they are currently developing new products and services that they intend to offer only to those users who opt in for verification.
- Currently, the organisation is looking to use **third-party databases** and are in discussions with potential providers, cost will be a deciding factor.
- The database(s) will then be checked by another outsourced company – most likely some form of **photo ID verification**.

\*refers to the internet's incorporation of blockchain and other user-based, decentralised technologies.

*"The teenagers may not even have identification documents other than their own school IDs, so it becomes very challenging to do an age verification when it comes to, you know youngsters. You can do background checks using various databases, like Experian has databases only for people who have bank accounts, credit cards, et cetera."*

*"Have a content moderation engine implemented in application at the moment. So, if there is any NSFW content (not safe for work) content on our app that automation detects that and puts it in a manual queue. Then once in manual queue, our team then look into it into that content, sees why it was flagged and then it either rejects that content or approves that content."*

*"We run on a shoe-string budget, we don't have sophisticated tools and techniques, we cannot afford to go to a higher external agencies to do this kind of checking. So, we try to do whatever we can on our own with our own equities and reading online."*



# Case Study 4

- The organisation uses:
  - **Self-declaration** (within Ts&Cs when user sets up account).
  - **Payment card** (when user purchases premium membership service)
- Given the low user base currently, the respondent **performs informal checks** of all new users themselves and continues to monitor activity of any suspicious accounts.
- The respondent anticipates that as the user base grows, they will have to implement more formal age assurance measures.
- The main barriers are **cost** and a **lack of knowledge / confidence**.
- At the moment, there simply aren't enough users to **justify the financial cost** of hiring an external company to set up age verification.
- The respondent themselves feels **completely lost** when it comes to knowing where to look for guidance and support.
- They would really appreciate a **centralised directory for small businesses with costs up front**, so they know where they look that it's affordable.

*"I want to do some form of formal ID integration on the site. But being honest, I literally can't afford it yet. I am talking to a company: I've been quoted 40p a user, which might not sound like a lot, but if you have 2500 users that's lot."*

*"Showing driving licenses and stuff ... I think that could put people off"*

*"I think for anybody that's got a business online, then there should be clear guidance [...] a lot of it is you just have to ask around or you hear it [...] there's no guidance, nobody tells you anything, you just find out as you go along [...] As far as I know I'm doing everything right and legally, but how can I be sure? Something that's as important as this, there should be clear guidance, but then who would that guidance come through?"*



# Case Study 5

- The organisation uses:
  1. **Self-declaration** (once user has bought and installed the game. Users will also have self-declared age on their gaming console account).
  2. **Payment cards** (optional, used to check consumers of 18+ games).
- The main factors in age assurance decision making are **cost** and **user experience**.
- Self-declaration has minimal friction. Payment cards have slightly more but are still acceptable. **Other measures are simply too disruptive to the user experience** to be considered viable.
- They are **not aware** of any additional age assurance methods that they could reasonably implement.
- They would appreciate **guidance** on other age assurance methods that **work in practice** and how to implement them.
- The **main barriers** to implementation of new measures are the **difficulty of implementation**, and the hit to potential player base and revenue.
- The main benefits of using age assurance is public relations and the **ability to demonstrate compliance to users**.
- They think the **responsibility** for age assurance should fall on the **distributors and game marketplaces**, rather than the game developers themselves.

*"[Our legal team] don't necessarily care if age assurance actually works, they just care whether it fits the definition. It's more from the customer support overload standpoint that it matters to us because if we can reduce the number of kids that use their parent's credit card to buy stuff. We have to deal with that afterwards - that's actually financially beneficial for us."*

*"I think once it comes to the payment that's where we add a little bit more friction. We're ok with that because by that point the person's committed, they want to buy something in the game so it's more likely they'll be willing to go through it."*

*"There isn't a great way to deter a highly motivated kid from playing the game if they want to play the game. You have to go through a lot of effort if you actually want to put them off from playing, and if their parents aren't restricting it's very hard for us to ever properly guarantee that they can't get access to it. There's a question of whether we need to be better at educating parents."*

*"I really think that having regulation around the platforms or distributors who sell those games, and making sure that they have the restrictions in place and do that in a more rigorous manner, would help the whole industry. So practically if I go on a gaming console webshop and I want to buy a game, they should have to ID me and check my facial biometrics and stuff once, so the account is 100% an 18+ account. Everyone benefits from that for years right because everyone's account is confirmed. That makes it significantly harder for any underage children to, without the parent's knowledge, access those games'*

# Case Study 6

- The organisation uses:
  1. **Self-declaration** (when the user enters the app they input D.O.B. Users will have also self-declared age in the app store.)
  2. **Payment cards** (when user buys age restricted in-game products).
- The main factor in age assurance decision making is **user experience**; self-declaration is the best balance for the business, as "it just works".
- Their main demographic is **over 50s**, and this age group tends to be **reticent towards giving over private information** and data.
- Other barriers to implementation are **set-up costs** and **effort**, and the lack of commercial benefit that would result from implementation.
- The only thing that would change their stance is if **new policy** was introduced.
- They view the potential repercussions of not having the appropriate measures in place as more of a commercial issue, rather than a compliance one.
- The respondent thinks the **responsibility** for age assurance should fall on the **App Store and similar marketplaces**, rather than the app developers themselves.

*"It's really important [that user] onboarding is quite short and easy to use. For that reason we're having a very limited amount of tools and facilities to validate your age ... an elegant solution is just to indicate your age range, like are you younger than 18 years old, are you 18 to 25, and you just press the button."*

*"The benefit is in the limited amount of penalties and also as a target for a proper audience we can polish our game [and get a] better understanding of our core users, like people who'll be paying in the game [...] Age verification is a pretty useful thing to limit the amount of unnecessary people in the game who will not pay."*

*"Unless something changes on the high level, so for example if the platforms like the App Store will create some new rules for verification or additional requirements for the age restriction, then probably yeah we will need to align to these requirements to stay in the market."*



# Case Study 7

- The organisation uses:
  1. **Self-declaration** (when the user creates account).
  2. **Third party databases** (to check user's name and D.O.B against)
  3. **Payment cards** (when user puts down a deposit).
  4. **Photo ID matching** (if user fails bank card checks)
- The main factors in age assurance decision making are **user experience** and **compliance with British Gambling Commission**.
- **Over 50s** in particular tend to struggle with technology and providing the requisite information.
- The big challenge they face is discouraging money-laundering activities, rather than identifying ages.
- The organisation **does not currently plan** on implementing any additional measures as they think the ones they have currently **work very well**.
- The main benefits of the current method are **compliance** and the ability to **demonstrate this to users**. This then has a large commercial benefit.

*"Players don't want to be waiting around for their photo ID to be approved, which is why generally this sits as the last method to confirm a player's ID, to obviously make sure we know who they are, but also to comply ... it's time-consuming and people don't enjoy doing that. So actually, we find that there is a significant drop off when people are asked to provide their KYC documents."*

*"The age assurance methods that we have work extremely well."*

*"User confidence and compliance are important for a brand in this industry ... Being shown to comply with very, very strict regulation to operate in the UK means that you have a license to operate in the UK, and that allows us to run marketing campaigns, build the brand, get more players in, and that will generate revenue."*

# Case Study 8

- The organisation uses:
  1. **Self-declaration** (when accessing information)
  2. **Third party databases** (when user purchases or accesses age- restricted content)
- The main factors in age assurance decision are **compliance** and **user safety**.
- They think the current methods work well enough and have no issue with them. In fact, they think it gives them a competitive edge over similar service providers, offering greater security to the user and improving commercial standing.
- However, they would have appreciated more **external guidance and support**. They find talking with other businesses gives them more confidence in making age assurance decisions.
- The organisation is considering implementing **artificial intelligence** and other forms of digital verification, in order to **further ensure accuracy, compliance and user protection**.
- But they are aware that **excessive checks** may put users off and harm business.

*"We've been able to go to other organisations and say this is the age assurance verifications that we are doing and others are not; so that's given us more of an appeal to win work from external organisations, whereas we know some of our competitors aren't using these methods."*

*"It's always nice to have different views and opinions of other organisations or people who have implemented their own tools and provided insight into what they think works, and why it works, and how easy or hard it was to implement, but it's quite hard to get hold of that kind of information."*

*"Sometimes the third-party information that has been provided ... could also be tampered or be manipulated in a certain way, so it's not always going to be 100%"*

*"Sometimes users don't believe that they should go through so many hoops and that the process should be so long-winded when they're accessing certain types of content and information. And so, there's been pushback from the users and also it could mean loss of business as well for us."*



# Case Study 9

- The organisation does not use any measures and instead focuses on filtering out inappropriate content that may appear on the app.
- As a very small company in the streaming sector, their **resources are very limited** so careful consideration on allocation of these resources is required. Given age assurance is **not mandatory**, they see no need to put resource into it at the moment.
- **Age assurance is also not a priority** as under 18's are not accessing the services in significant numbers (estimate less than 5% of audience).
- As a start-up their **main consideration is making profit** and attracting new users. If they were to use age assurance methods in the distant future, The main purpose of it would not be for its intended purpose **but to better understand the demographics** of their users.
- **Self-declaration** would be the only method utilised as this would provide them with data but is the **most frictionless option**.

*"We clear inappropriate content, So it tends to be live streams so you can live stream on the platform where people include inappropriate content, imagery, pornographic imagery we have that removed. That's about as far as age assurance methods go."*

*"We're very much as a business focused on being profitable and creating runway for the business...Age assurance is definitely not going to get us there, it's as simple as that"*

*"I could imagine us having to consider age assurance more in a world where we are trying to go through bigger growth as a business, but right now it's a no...I guess there'd be some sort of identification verification process when you sign up, maybe there'd be a limit on how old you need to be to become a proper signed up user to the programme. I couldn't imagine us doing something more rigid than a self declaration."*

*"If there was some sort of threat from a legal perspective we would annul that threat if we were to respond to it. I guess the thing that would impact us the most would be the need to divert resources to the implementation within the platform, that would probably be the most expensive [part] for us."*

# Case Study 10

- The organisation uses:
  - 1. Third party databases** (when user accesses website or app)
  - 2. Self-declaration** (when user sets up account)
  - 3. Payment cards** (when user purchases subscription)
- The main factor in age assurance decisions from their point of view is the **user experience**.
- They are aware that self-declaration tends to be weak, especially since a lot of children will try to access certain content, hence the need for third-party databases.
- One of the key problems is **family / household accounts** with individuals of a variety of ages all using one profile.
- To combat this, they are considering implementing **on-platform behavioral inference** to build a clearer picture of the age profiles in each household.
- A key benefit of age assurance measures is they are able to **target adverts**, one of the company's largest revenue streams.
- The organisation feels there needs to be **more guidance and support** – for **both businesses and consumers** - to understand why compliance is so important, and what methods should be used to achieve this.

*"It's not out of the ordinary to ask for your date of birth, and if you're paying for a service, you need to put your card details in so those are familiar things that shouldn't completely throw people off. So, in terms of like not having to introduce new behavioral steps or things that are not akin to what people are used to, it makes sense to use those [age assurance methods]."*

*"[Understanding our users] doesn't necessarily change the types of content we produce, because we kind of know we have to cater to everyone anyway. But in terms of who we target, having the actual date of birth is really beneficial ... ads bring in a lot of money, so targeting it to the right people that are probably going to engage with the ads makes the most sense."*

*"Even just the general public knowing what should and shouldn't be the case probably makes it better. If you're a parent or a grandparent, or you have kids around, understanding why certain things should be going the way they do, probably if people have the right information, it makes them more willing to give you the right information."*