

How online businesses are using age assurance: Research findings

IFF Analysis

April 2024



Background

The world of age assurance is developing rapidly; IFF Research were commissioned to help ICO keep pace with how ISS are responding to age assurance regulation in practice, and to understand their 'real world' application.

Additionally, the ICO aimed to compile baseline data regarding the utilisation of age assurance methods within key industry sectors, investigating their prevalence and identifying the specific methods employed if applicable.

Research Objectives

- Whether ISS use age assurance method(s), and if so, which method(s) are used.
- Why ISS have chosen a particular age assurance method.
- The number of children and percentage of users that are children that ISS assess are accessing their service (if known), including where relevant what the age and age ranges are.
- Consideration factors in age assurance decision making processes, including reasons for use and non-use.
- Whether and how ISS assess if the age assurance measures are accurate and successful.
- Type and scale of challenges when adopting age assurance measures.
- Knowledge of the ICO's remit and use of ICO guidance in determining rationale for use of age assurance measures.

Executive summary



Use of age assurance methods

- Three-fifths (63%) of all organisations surveyed said they use age assurance methods. Self-declaration was the most common age assurance method used (53%), followed by credit and debit payment cards (38% each) and photo identification biometric matching (28%).
- Close to a fifth (17%) of all organisations said they had plans to implement new age assurance methods in the future. Those who already had age assurance methods in place were more likely to have plans for future implementation (23% vs 17%).
- The most common measure that organisations were planning to implement was family account holder confirmation (32%), credit card checks (22%) and mobile network operator 18+ content restriction filters (20%).
- Amongst those that had age assurance measures in place most reported benefits (87%). The most frequently reported benefit was increased user confidence (48%), closely followed by it being easier to target users appropriately (44%).

Executive summary



Age profile of users

- Around a quarter (27%) of surveyed organisations reported having users under the age of 13 access their products or services and close to half (45%) reported having users aged between 13 and 18 access their products or services.
- Amongst organisations with products or services targeted at users over the age of 18, 40% were aware of users under the age of 18 years old attempting to access any of their products or services. Amongst those that were not aware of under 18s attempting to access their products or services, a third (36%) said it was not possible for them to do so, a third said it was possible but unlikely (36%) and a quarter (23%) said it was both possible and likely.



Awareness and knowledge of the ICO and the Children's Code

- Over half (52%) of all organisations said they were aware of the ICO and its work ahead of their participation in the survey. Amongst those that were aware, nine in ten were familiar with the ICO's remit on upholding information rights (90%).
- Four fifths (82%) of organisations aware of the ICO had used ICO materials or services in the past. Of these, 91% reported that these materials and services impacted their selection of age assurance methods to at least a moderate extent.
- Over two thirds (67%) of all organisations said they were aware to some extent of the Children's Code. Amongst those that were aware, more than four fifths reported a good understanding of the Code's standards and obligations under data protection law.

Executive summary



Factors of consideration when selecting age assurance methods

- The most important factors when selecting age assurance methods were accuracy, the extent to which user's privacy is preserved, cost effectiveness and ease of use.
- The weight of these factors differed between different age assurance methods. For example, the most common reason given by those who used self-declaration for selecting this method was that it is easy to set up and carry out (63%). The most common reason given by those who used payment card (credit) for selecting this method was that it provides accurate information (53%).
- During qualitative interviews there was a consistent theme that user experience was key to decision making. There was a recurring concern that adding numerous or advanced measures would deter users.




Challenges faced adopting age assurance methods and reasons for forgoing them altogether

- During qualitative interviews, some organisations expressed uncertainty around the legal requirements and how to implement age assurance methods. They felt they would benefit from more guidance and support on the topic, including proven methods of successful implementation.
- Organisations in qualitative interviews also identified the cost of implementing and maintaining age assurance measures was a significant barrier. This was a particularly pronounced barrier for smaller organisations. Some organisations were also concerned about a loss of revenue from age assurance methods deterring users.
- Amongst those that did not use age assurance methods, the most common reason given was that their products / services were suitable for all ages (39%). The second most common reason was a lack of awareness about age assurance methods being requirement (29%) and the cost of setting up age assurance methods (19%).

About this Report

Individual sectors have been consolidated into broader summary sectors to provide a more comprehensive overview in this report. This grouping allows for easier analysis and comparison of data across related industries within the same sector.

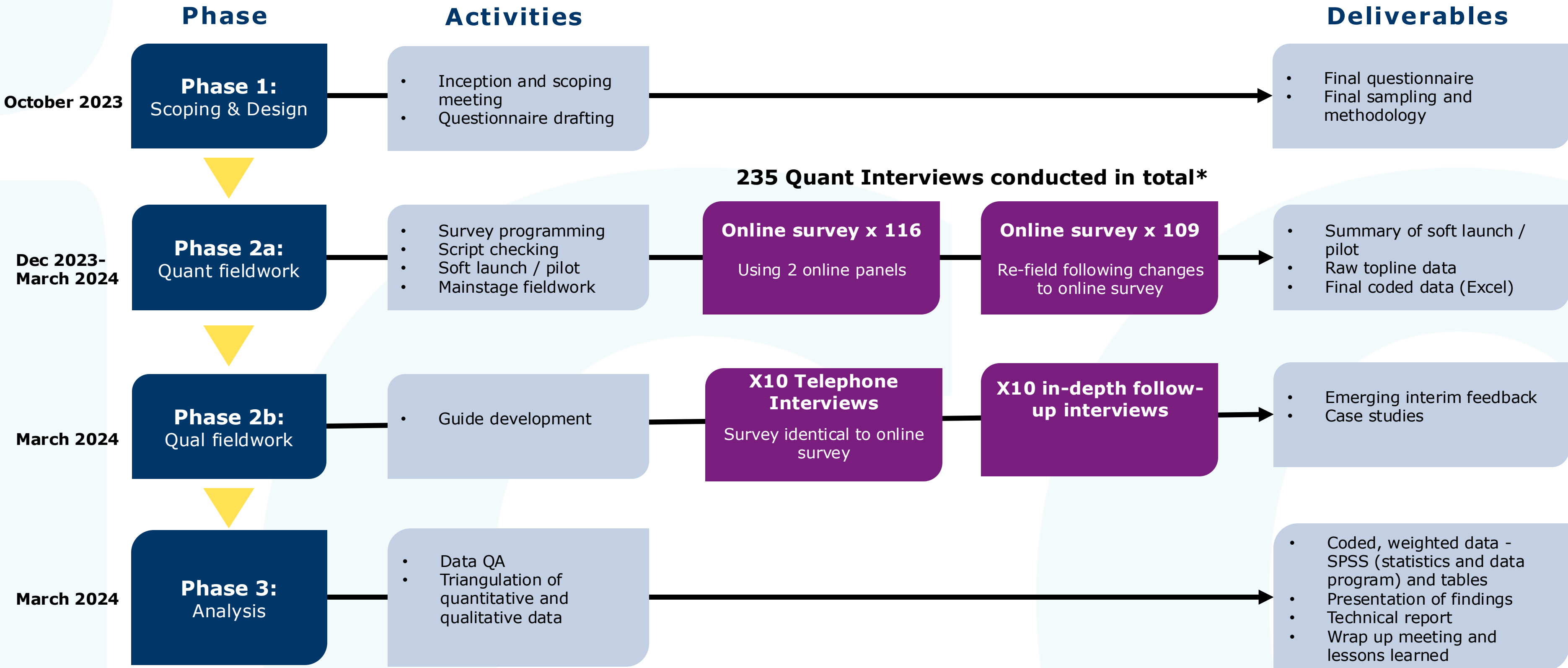
Base sizes are shown alongside the question text, usually found below charts. Please note where subgroup bases fall below a count of 30, data will be shown as a base count rather than a percentage. Caution should be taken when drawing conclusions from these figures. 

As some of the questions asked in the survey are multiple choice, displayed figures in the charts for these questions may total more than 100%.

Information society services are defined as a businesses that provides online or internet enabled products or services for revenue.*

*<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/age-appropriate-design-a-code-of-practice-for-online-services/services-covered-by-this-code/>

Research overview



*Please see slide 8 regarding data collection challenges.

Research Challenges



Online method: Quantitative data was collected through two online panel providers in two tranches. The survey subject matter was very complex, and while reassurances and further explanation on technical terms were offered, no interviewers were on hand to provide further explanation if required. We cannot guarantee that participants fully interpreted every explanation/technical definition of Age Assurance in the same way.



Sample composition: There are no population statistics related specifically to ISS through which to weight our achieved sample to. BEIS population counts on specific SIC codes* do not align neatly with the delivery of online goods and services. The achieved sample is therefore unweighted and profiled towards larger businesses.



Sample size: During the first tranche of data collection some interviews were excluded from the data following QA checks. Improvements were made to screening and live in-survey QA processes during the second tranche of fieldwork. The impact was a lower sample size than originally planned. Although robust at an overall level, it does reduce the statistical reliability of some sectors of interest.



Agreement to participate in qualitative follow-up: The agreement rates from the online quantitative survey were lower than expected, and a mitigation plan put in place whereby the qualitative participants were free-found through a telephone approach. All participants still completed the quantitative survey ahead of the in-depth interview and their data is included in the quantitative findings.



Pornography sector engagement: No ISS in the pornography sector took part in this research. While unlikely to affect the overall findings, the pornography sector was a targeted sector, and their lack of engagement could be a potential limitation for this research.

* Standard Industrial Classification (SIC) codes are four-digit numerical codes that categorise industries based on their business activities. These codes help classify companies according to common characteristics shared in their products, services, production, and delivery systems

Organisation profile



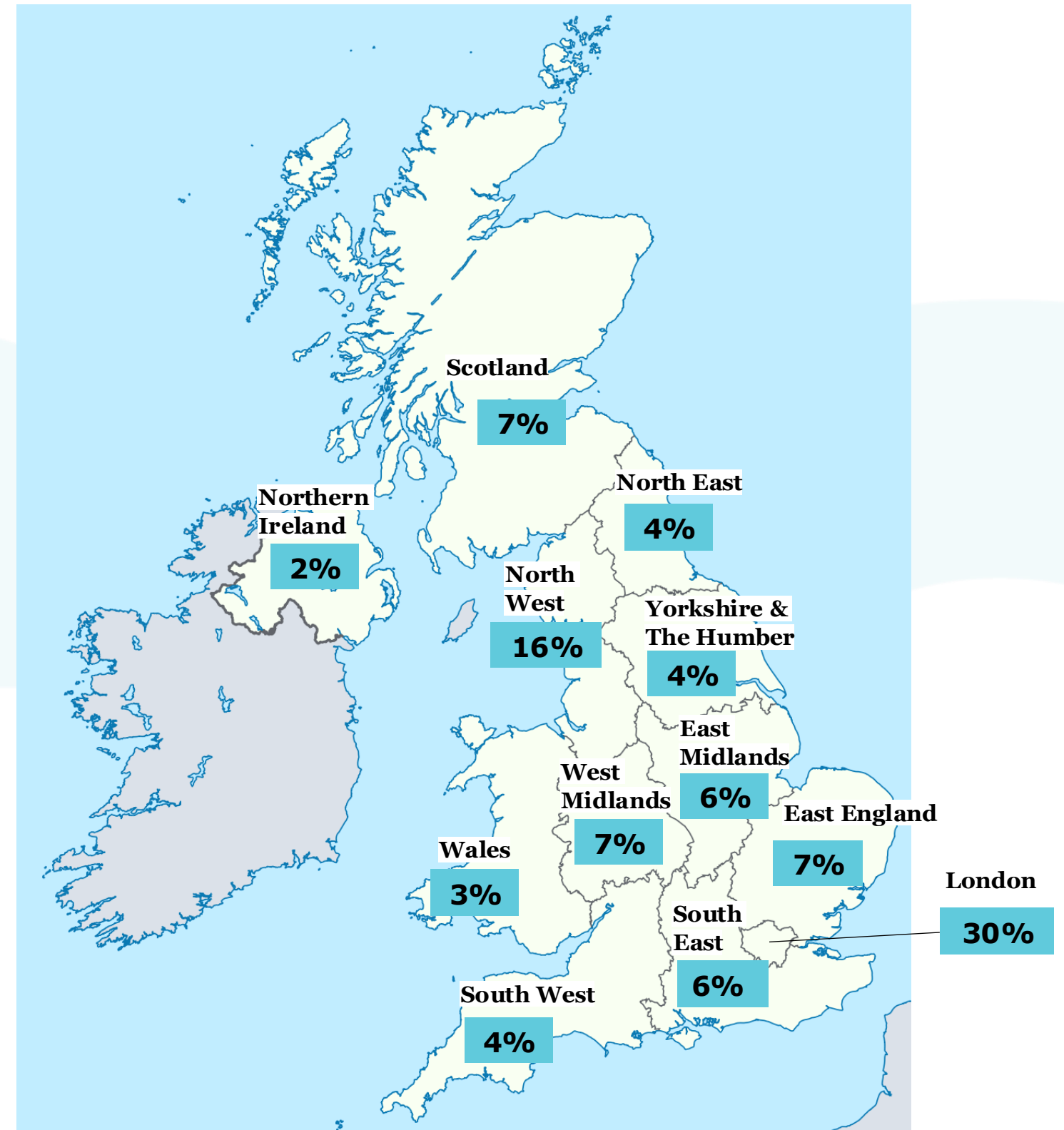
Quantitative Interviews
235



Qualitative Interviews
10

Organisation size	%
0-1 employees	13%
2-9 employees	6%
10-49 employees	18%
50-249 employees	21%
250+ employees	37%

Organisation's targeted user age group*	%
Under 13 years	20%
Over 13 years	46%
Over 18 years	87%
Exclusively over 18 years	43%



S11. Approximately how many people does your organisation employ? (All: 235) Don't know/ Refused- 4%
 S6. Are any of the online, or internet-enabled, products or services that you deliver aimed at the following age groups in the UK? (All organisations: 235)
 * This was a multiple-choice question, percentages will sum to more than 100%, plus a derived percentage of organisations that responded that they only target 18+ users has been included.

F2. Where is your business/organisation's head office located? (All organisations: 235) Don't know/Refused- 5%

Survey organisation profile

Provision of online products / services



Products
17%



Services
41%



Both- Products & Services
42%

S3- Does your organisation provide any online or internet-enabled products or services? (All organisations: 235)

Sectors 18+	Number
Financial	27
Social media	5
Games with a PEGI rating or equivalent of 18+	5
Online gaming / streaming of games with a PEGI rating or equivalent of 18+*	4
Gambling	4
Online dating	3
Music and video streaming	3
Educational (18+ users)	-
Alcohol	-


* Online gaming refers to playing an electronic game via the internet or other computer network. Games may be streamed in a fashion similar to video or music streaming platforms. Games are published with age restrictions from 3 years up to 18+.

Sectors (all ages)	Number
Food and consumer goods	25
Health and fitness services	23
Educational products and online learning materials	18
Computer software	17
Online marketplace for third party goods/services	8
Social media services	8
Music and video streaming	7
Phones and communication devices	6
Live events and sports tickets	4
News / education websites / subscription services	4
Electronic services controlling connected toys and other connected devices	4
Games devices (including consoles) and connected toys	3
Online gaming / streaming*	3
Travel	3
Online messaging or voice telephony services	2
Magazines, books, and media	1
Other	15

S12b - Of the sectors you have chosen which would you consider to be your primary sector? (All: 202) A table showing how sectors were summarized can be found in the technical annex.

Qualitative interviews profile

Number of Qualitative Interviews per chosen sector

 <p>Music & Video Streaming 3</p>	<p>18+</p> <p>Games with a PEGI rating or equivalent of 18+ 1</p>
 <p>Social Media 2</p>	 <p>Online gaming/ streaming of gaming 1</p>
 <p>Online Dating 2</p>	 <p>Gambling 1</p>

	Yes	No
Use age assurance method	8	2

Ten organisations from various sectors participated in a qualitative interview lasting between 40 and 60 minutes. The purpose of these interviews was to enhance the findings of the online survey, helping the ICO gain a deeper understanding of how organisations make decisions regarding age assurance.

Organisations were asked to identify their primary sector; however, it is important to recognise that numerous organisations function across several sectors.

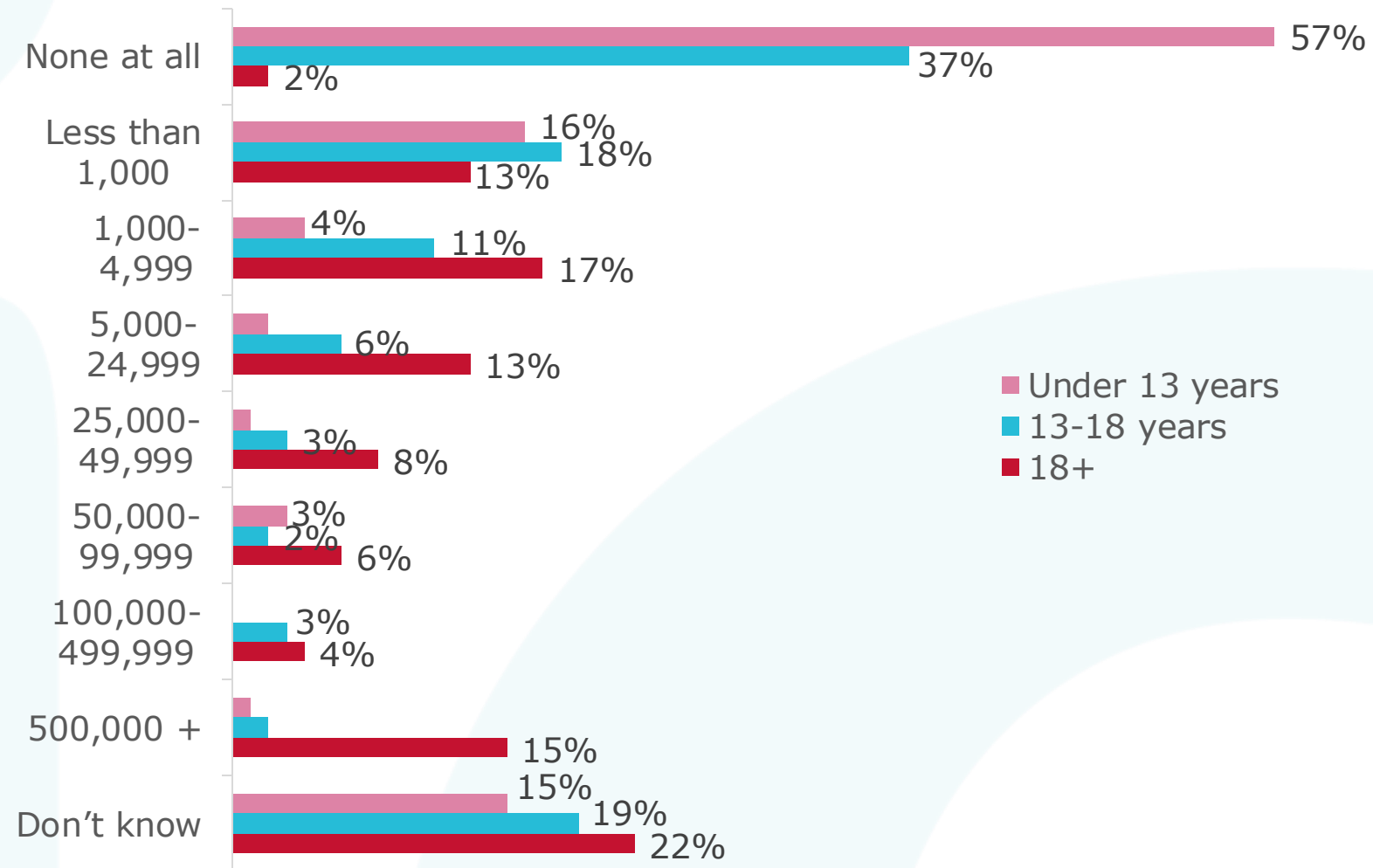
“

It is a bit of everything. I would say that music and video streaming would be our primary industry. But you could...also potentially bucket it into online marketplace.. even delve into the online gaming slash streaming industry.

User profile and access

User age profiles and underage access

Organisation user numbers by age profile



Around two fifths (37%) of all organisations surveyed reported that no under 18s access their products / services.

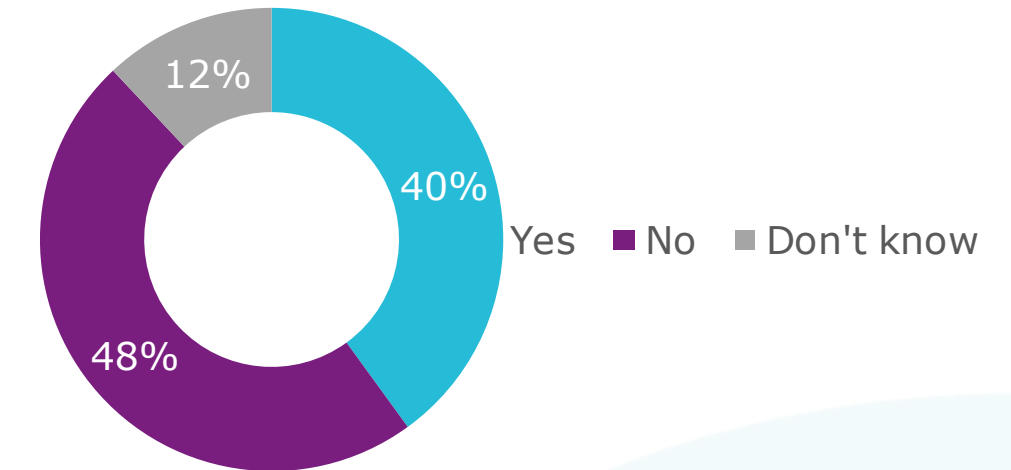
Over half (57%) of all organisations surveyed reported that no under 13s access their products / services.

For each age profile, **around a fifth of all organisations** report **not knowing** how many users they have.

C7- What is the total number of users of your organisation's products/services that are in the following age ranges? (All: 235)

S7. Are you aware of children under the age of 18 years old accessing or attempting to access any of the products or services that you offer? (Base: All with products/services aimed at those 18+: 204)

Awareness of under 18s attempting access

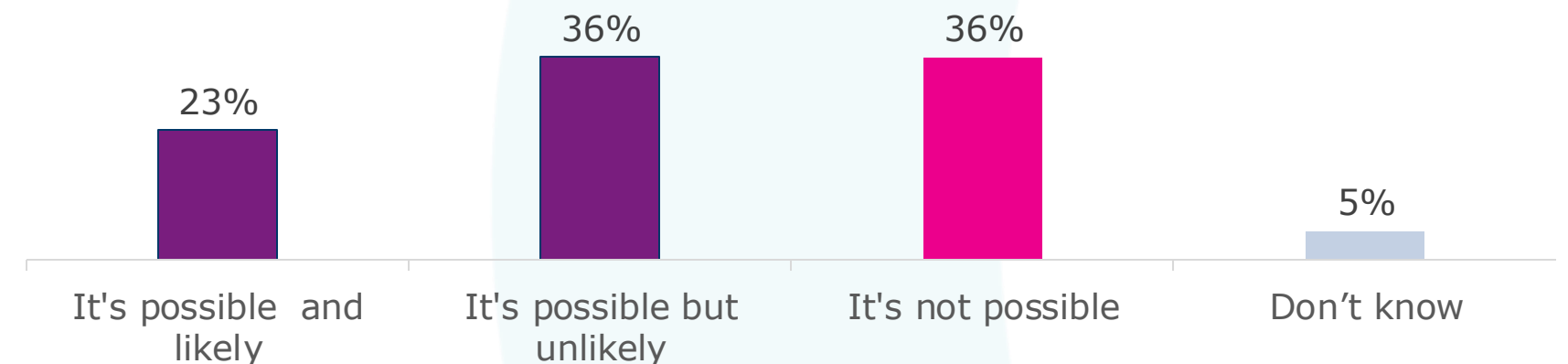


For those organisations with products/ services aimed at 18+, **40% were aware** of children under the age of 18 years old attempting to access any of their products or services.

Over a third of those who weren't aware of under 18s accessing their products / services said it was **not possible** for them to do so. Those who used **payment cards** as an assurance measure were **more likely** to say under 18 access was not possible (47% for both credit and debit).*

But over half (59%) said it was possible to some extent.

* Please note that though credit cards require users to be 18+ and debit cards do not, figures throughout this research were largely similar between users of both age assurance methods.

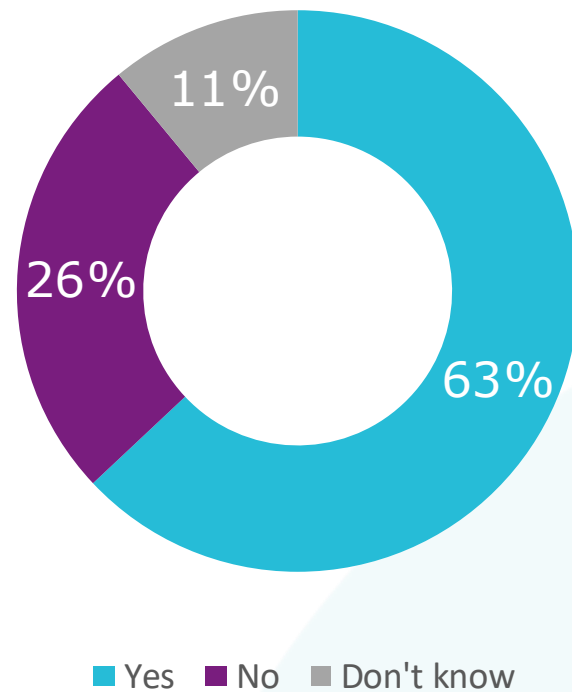


S8. Is it possible and likely for children under the age of 18 years old to access the products or services that you offer online? (All who are not aware or unsure of those under 18 accessing their products/services: 122)

Age assurance methods

Age assurance: overall use summary

Organisations that use age assurance methods*



Close to **two thirds (63%)** of all organisations surveyed said they **use age assurance methods**. A quarter (26%) did not and 11% were unsure.

Self-declaration was the most common age assurance method used (53%), followed by credit and debit payment cards (38% each).

Summary: Most popular age assurance methods	% of those who use age assurance measures
Self declaration	53%
Payment card (credit card)	38%
Payment card (debit card)	38%
Photo identification biometric matching	28%
Family account holder confirmation	18%
Third party databases	12%
Digital footprint	11%
Mobile Network Operator (MNO) 18+ content restriction filter	11%
Open banking	10%
On-platform behavioural inference	6%
Reusable digital identity wallet	6%
Other ID verification method	4%
Biometric estimation through facial analysis	2%
Unspecified AI software	1%
Other	2%

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). *The proportion of organisation using / not using age assurance methods was derived from the results at question B4. This was a multiple-choice question; percentages will sum to more than 100%.

Age assurance – factors for selection

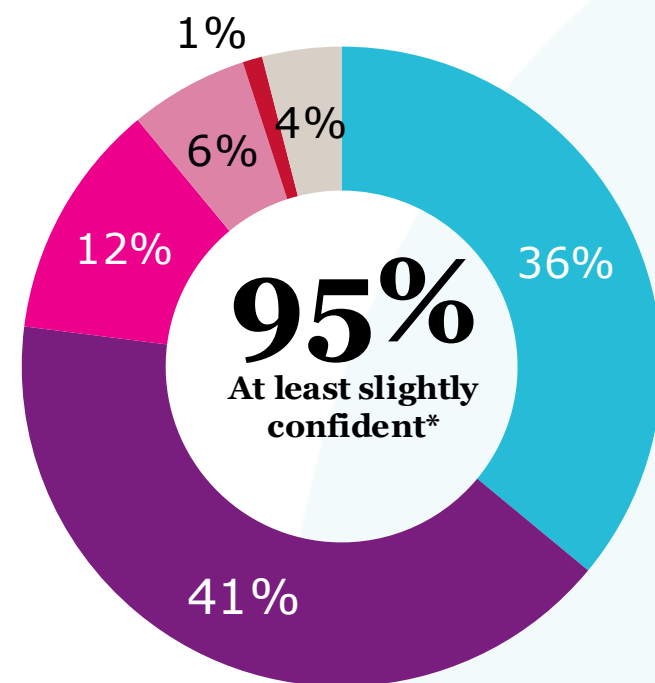
The vast majority (95%) felt at least slightly confident in selecting and using age assurance methods. Those aware of the Children’s Code were more likely to be at least slightly confident (98% vs 86% of those unaware).

Over a third (36%) said they were completely confident. Organisations targeting 18+ users exclusively were more likely to be completely confident (46%).

Only a small minority (1%) said they were not at all confident in selection.

Organisations reported that the most important factor in selecting age assurance measures is accuracy, and the least important factor is whether competitors are using it.

Confidence selecting age assurance method

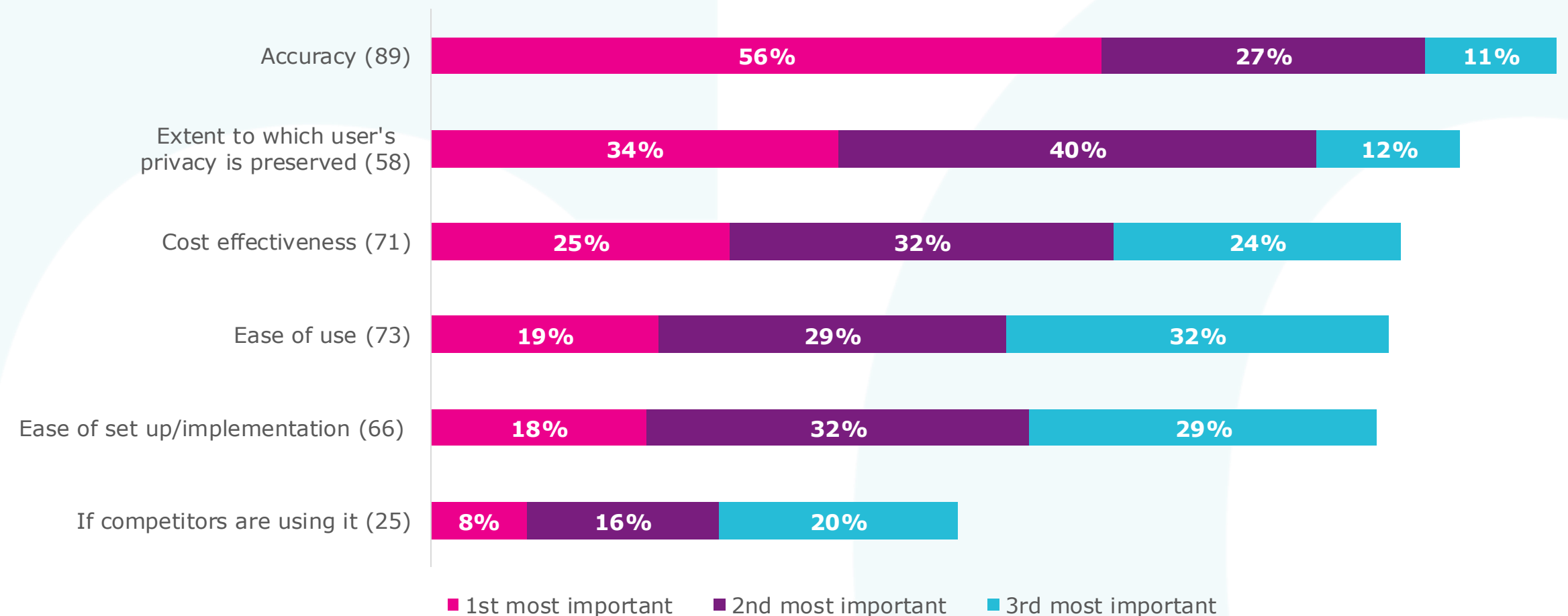


■ Completely confident
■ Fairly confident
■ Somewhat confident
■ Slightly confident
■ Not at all confident
■ Don't know

B13- Overall, how confident is your organisation in selecting and using appropriate age assurance methods? (All who use age assurance methods: 150)

* Net score of completely/somewhat/fairly and slightly confident

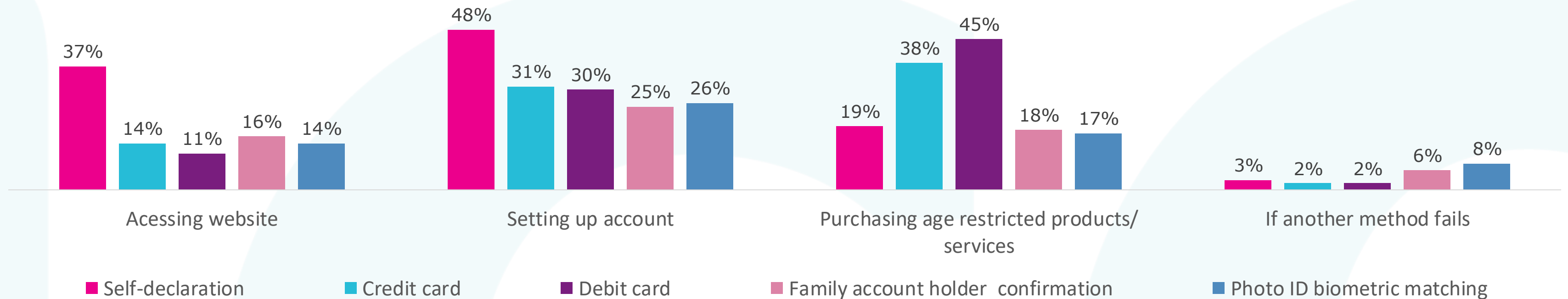
Most important factors when selecting age assurance methods



B12a - In order of importance, what are the most important factors for your organisation when selecting appropriate age assurance methods (All who use age assurance methods: total number who selected each factor at B12 indicated in brackets). This was a multiple-choice question; percentages will sum to more than 100%.

Age assurance by user journey

Account set up is the most popular website touchpoint for age assurance use



The most common stage for implementing age assurance measures is when the **user sets up an account**. This is especially true for **self-declaration** and **payment card** measures.

Unsurprisingly, **payment card** measures tend to be utilised more than other measures when the **user purchases age restricted products / services**.

When **another method fails**, the more complex age assurance measures are implemented, such as **photo identification biometric matching** and **family account holder confirmation**.

Full breakdown of all measures included in Appendix

B4- At what point during the user journey are these age assurance methods 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

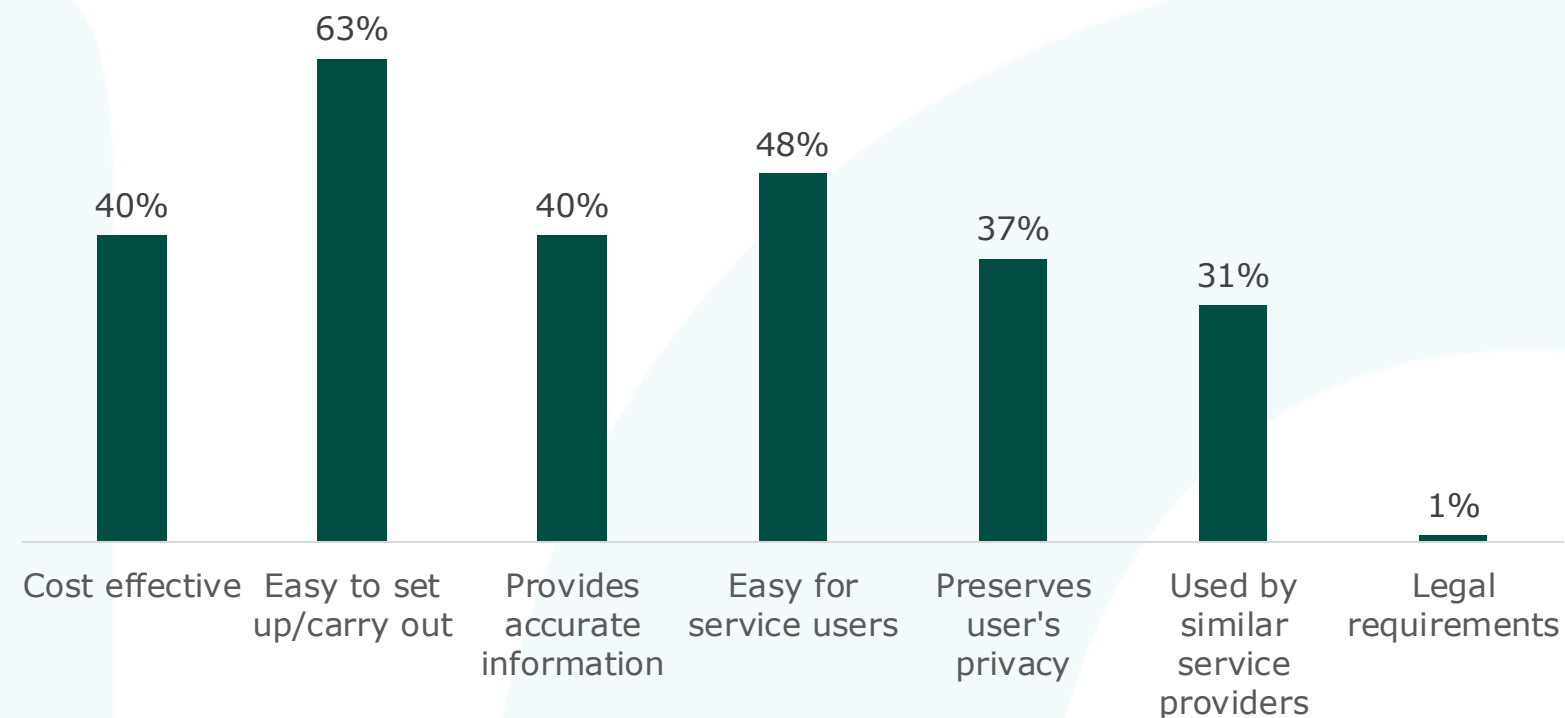
The Online Safety Act states that a method which requires users solely to self-declare their age is not age verification or estimation.

Self-declaration: reasons for and against use

The most common reason given by those who **used self-declaration** for selecting this method was that it is **easy to set up and carry out** (63%).

The most common reason given by those who **did not use** self-declaration was that it **does not provide accurate information** (23%).

Reasons for **using** this method



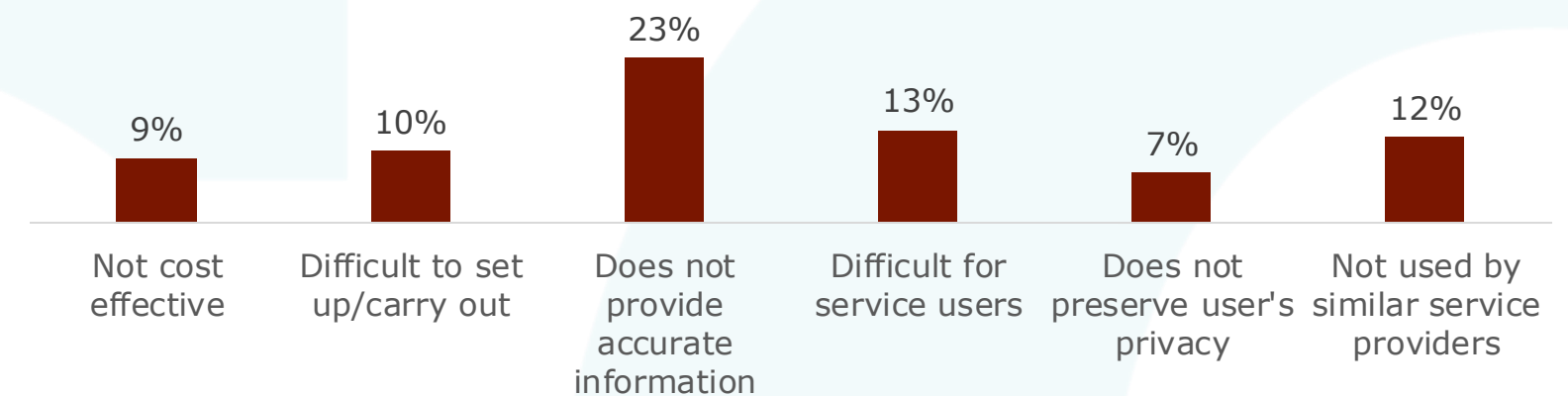
"It's really important their onboarding is quite short and **easy to use**. For that reason, we're having a very limited amount of tools to facilitate / validate age."

[Games with 18+ PEGI]

"Validation is pretty **easy and seamless**, and people are used to it, and I think that's literally the industry standard."

[Online gaming]

Reasons for **not using** this method



"I think the self-declaration is quite a **weak** one in my opinion. I think it's a **tick box exercise**. So, I'm not a big fan, but it's an industry standard and you know there are some high-level policies [to enforce it]."

[Music and video streaming]

"People are not going to give the right date of birth anyway."

[Social Media]

B10- Why has your organisation chosen to use this or these methods? (All who use Self-declaration: 91, Don't know-4%). This was a multiple-choice question; percentages will sum to more than 100%.

B11- Why has your organisation chosen not to use this or these methods? (All those who don't use self-declaration: 82, Don't know- 18%, unknown recorded data - 26%). This was a multiple-choice question; percentages will sum to more than 100%.

Self-declaration: effectiveness


Amongst those organisations employing **self-declaration** as an age assurance method the following factors were mentioned in the qualitative interviews :

- ✓ **Ease of use** for both the user and organisation, in many cases the self-declaration is incorporated in the terms and conditions at sign up.
- ✓ **Cost effectiveness** of the assurance, especially if they need to remain compliant with law and industry standard practice.*
- ✗ **Accuracy** is limited, without the addition of additional assurance methods.
- ✗ **Open to falsification** of identity and can result in children accessing when they are under the age rating.

* Albeit stemming from a few interviewees' understanding of compliance and thus not representative, it was interesting to note the belief that self-disclosure alone is usually adequate to fulfil legal requirements.

Of the 53 organisations in the survey who used this measure and assessed age assurance methods:

- **40** deemed self-declaration EFFECTIVE
- **8** deemed self-declaration INEFFECTIVE

Of the 18 organisations in the survey who used this measure but have not assessed age assurance methods: 

- **11** deemed self-declaration EFFECTIVE
- **3** deemed self-declaration INEFFECTIVE

C2. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or a range of its users? (Base: All who use self-declaration and have assessed the effectiveness of the age assurance methods they use: 53)

C3. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or a range of its users? (All who use self-declaration and have not assessed the effectiveness of the age assurance methods they use: 18)

"[Without making it] too difficult for people to make an account because we obviously want our players to join and have a good experience."

[Online gaming]


"By far the most used method is self-declaration, that's what's driving almost everything."

[Online gaming]

"Not that much friction but is also easy to bypass by anyone."

[Online gaming]

Of the 19 organisations survey who **did not use** this measure or assess age assurance methods:

- **3** deemed self-declaration EFFECTIVE
- **7** deemed self-declaration INEFFECTIVE 

C4. Although your organisation does not use the following age assurance method(s), how effective do you think these methods are at determining the age or age range of its users? (All who do not use self-declaration or assess age assurance methods: 19)

Payment card (credit)

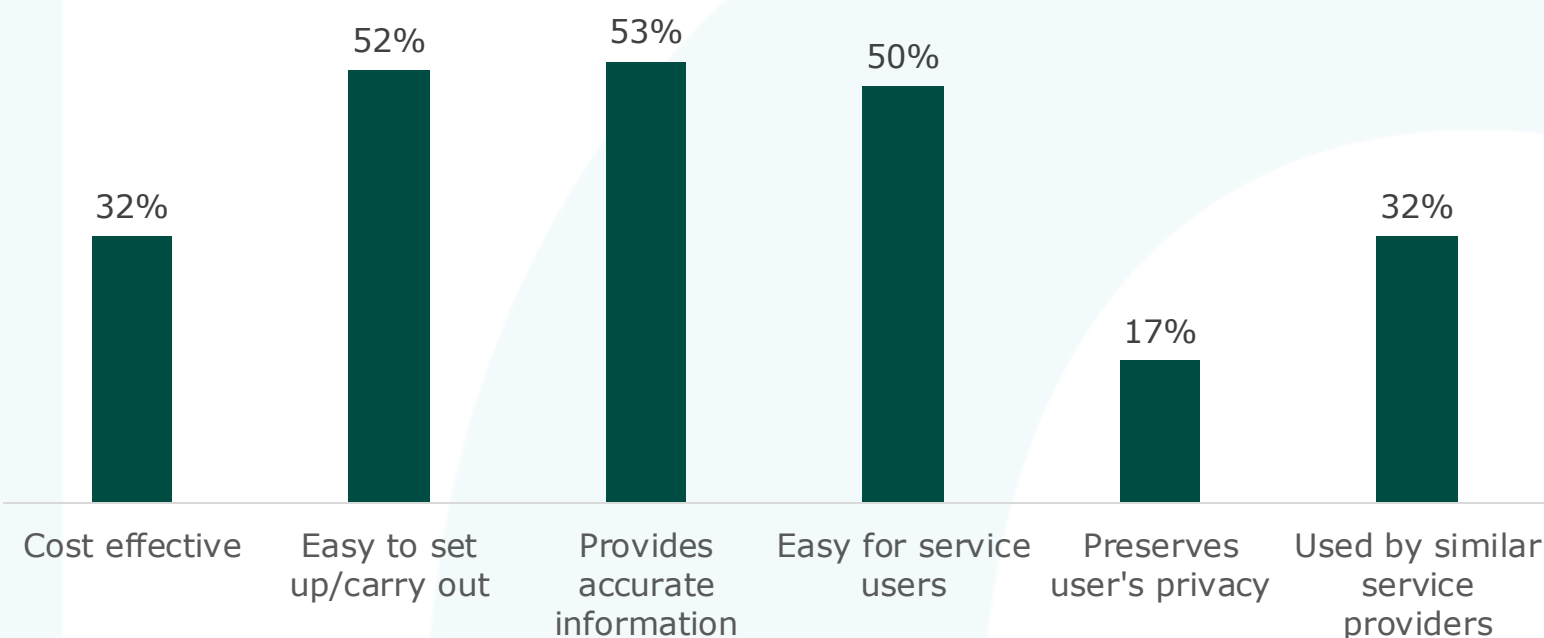
Payment card (credit): reasons for and against use

In the following slides, only payment card (credit) data has been summarised as the figures from this study has very similar finding for those using credit cards or debit cards as an age assurance measure. Those in the qualitative interviews often spoke of both methods as one, despite only 18+ adults being eligible to have a credit card.

The most common reason given by those who **used payment card (credit)** for selecting this method was that it **provides accurate information** (53%), closely followed by it being **easy to set up and carry out** (52%). Half (50%) also said it was **easy for service users**.

There were no standout barriers with this measure, but the most common reasons given by those who **did not use** payment card (credit) for not using this method were that it **was difficult for service users** and **not used by similar service providers** (both 15%).

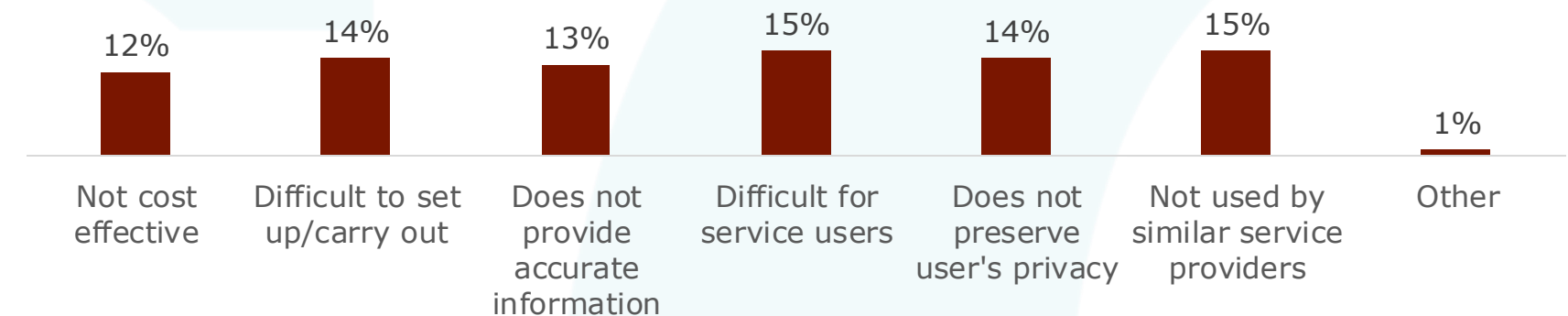
Reasons for **using** this method



"To comply with the British Gambling Commissions guidelines on how operators should behave if they are to have a licence in the UK."

[Gambling]

Reasons for **not using** this method



"It's very hard to tell if the person who's playing is actually the Dad or the child playing on their account, are they using their Dad's credit card, it's almost impossible for us to fix that issue."

[Online gaming]

B10- Why has your organisation chosen to use this or these methods? (All who use payment card (credit): 66, Don't know- 5%). This was a multiple-choice question; percentages will sum to more than 100%.

B11- Why has your organisation chosen not to use this or these methods? (All those who don't use payment card (credit): 107, Don't know- 19%, unknown recoded data - 22%). This was a multiple-choice question; percentages will sum to more than 100%.

Payment card (credit): effectiveness

Amongst those organisations, employing **payment card (credit)** as an age assurance method, the following factors were mentioned in the qualitative interviews:*

- ✓ **Ease of use** for the user. All who implement this measure do so when the user pays for a subscription service or an age-restricted product / service. This is what users expect and provides minimal disruption to the user experience.
- ✓ **Accuracy** is strong as checking against bank accounts is a very reliable means of checking that someone is over 18.
- ✓ **Fast and efficient** means of checking age.

* Note that interviewees often discussed credit cards and debit cards together as one measure and did not identify any key differences between them. Among the 10 interviewees, all those who used payment cards reported using both credit and debit card checks in the survey.

Of the 40 organisations in the survey who used this measure and assessed age assurance methods:

- **36** deemed payment card (credit) **EFFECTIVE**
- **2** deemed payment card (credit) **INEFFECTIVE**

Of the 12 organisations in the survey who used this measure but have not assessed age assurance methods:

- **7** deemed payment card (credit) **EFFECTIVE**
- **3** deemed payment card (credit) **INEFFECTIVE**

C2. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or age range of its users? (Base: All who use payment card (credit) and have assessed the effectiveness of the age assurance methods they use: 40)

C3. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or age range of its users? (All who use payment card (credit) and have not assessed the effectiveness of the age assurance methods they use: 12)

"[Payment cards checks] are familiar things that shouldn't completely throw people off. So, in terms of not having to introduce new behavioral steps or things that are not akin to what people are used to, it make sense to use those. [It's not] anything like creating something out of the box that's new to go and trying to capture this data."

[Music and video streaming]

"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 game so it's more likely they'll be willing to go through with it."

[Online gaming]

"You don't have to do this real time every single time because I would assume [once] you know the bank account information is something that's quite up to date and accurate."

[Music and video streaming]

Of the 21 organisations in the survey who did not use this measure or assess age assurance methods:

- **12** deemed payment card (credit) **EFFECTIVE**
- **2** deemed payment card (credit) **INEFFECTIVE**



C4. Although your organisation does not use the following age assurance method(s), how effective do you think these methods are at determining the age or age range of its users? (All who do not use payment card (credit) or assess age assurance methods: 21)

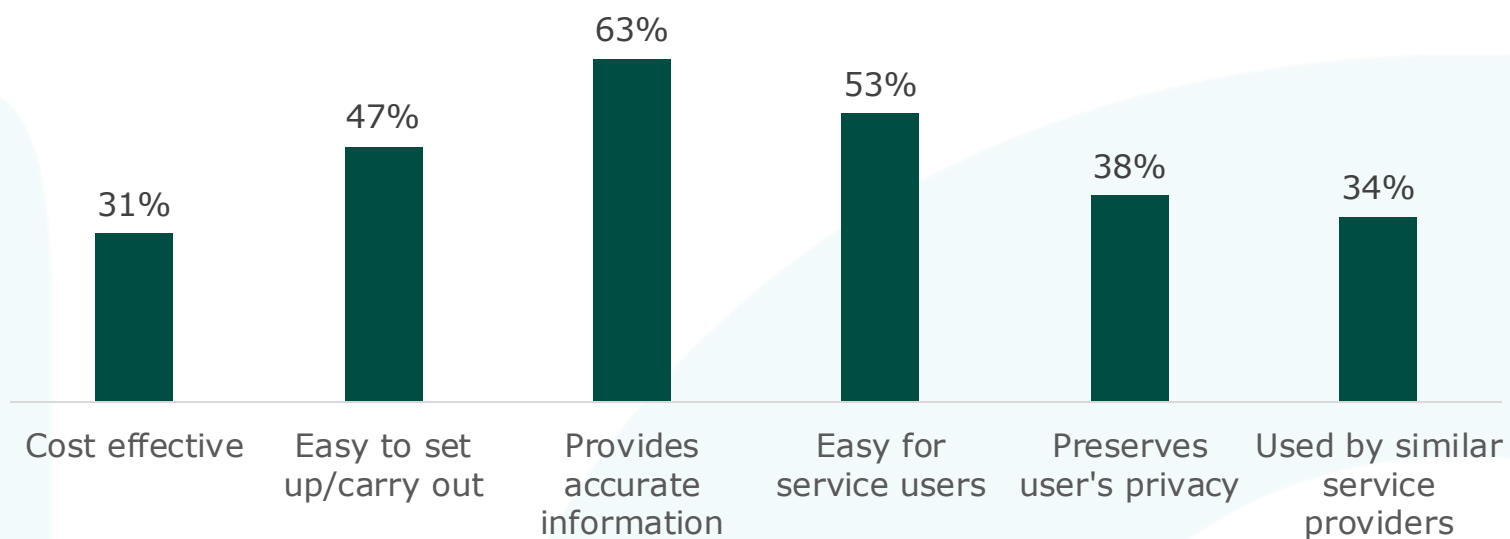
Family account holder confirmation

Family account holder confirmation: reasons for and against use

The most common reason given by those who **used family account holder confirmation** for selecting this method was that it **provides accurate information (63%)**.

There was **no standout reason** chosen by organisations as to why they do not use family account holder confirmation as an age assurance method.

Reasons for **using** this method



B10- Why has your organisation chosen to use this or these methods? (All who use family account holder confirmation: 32, don't know: 6%). This was a multiple-choice question; percentages will sum to more than 100%

Of the 17 organisations in the survey who used this measure and assessed age assurance methods:

- **14** deemed family account holder confirmation **EFFECTIVE**
- **1** deemed family account holder confirmation **INEFFECTIVE**



Of the 5 organisations in the survey who used this measure but have not assessed age assurance methods:

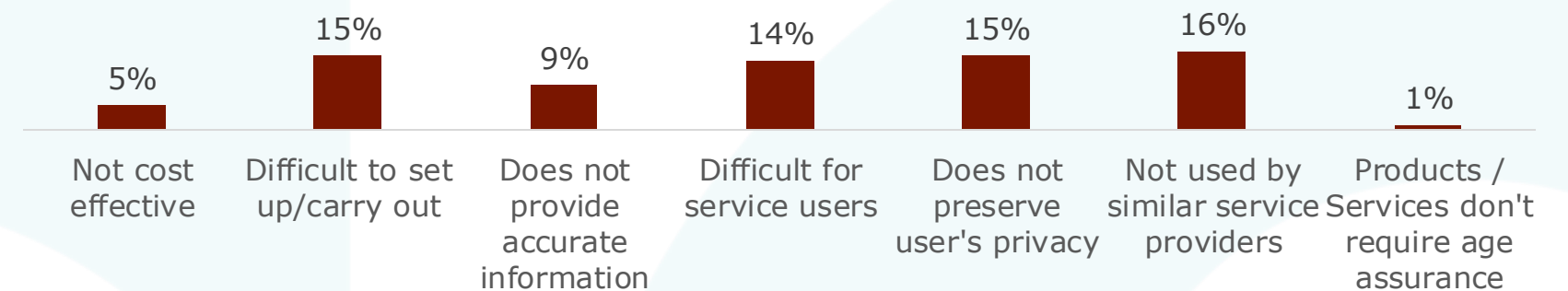
- **All 5** deemed family account holder confirmation **EFFECTIVE**



C2. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or age range of its users? (Base: All who family account holder confirmation and have assessed the effectiveness of the age assurance methods they use: 17)

C3. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or age range of its users? (All who use family account holder confirmation and have not assessed the effectiveness of the age assurance methods they use: 5)

Reasons for **not using** this method



B11- Why has your organisation chosen not to use this or these methods? (All those who don't use family account holder confirmation: 141, Don't know – 23%, unknown recoded data – 21%). This was a multiple-choice question; percentages will sum to more than 100%

Of the 33 organisations in the survey who did not use this measure or assess age assurance methods:

- **10** deemed family account holder confirmation **EFFECTIVE**
- **6** deemed family account holder confirmation **INEFFECTIVE**

C4. Although your organisation does not use the following age assurance method(s), how effective do you think these methods are at determining the age or age range of its users? (All who do not use family account holder confirmation or assess age assurance methods: 33)

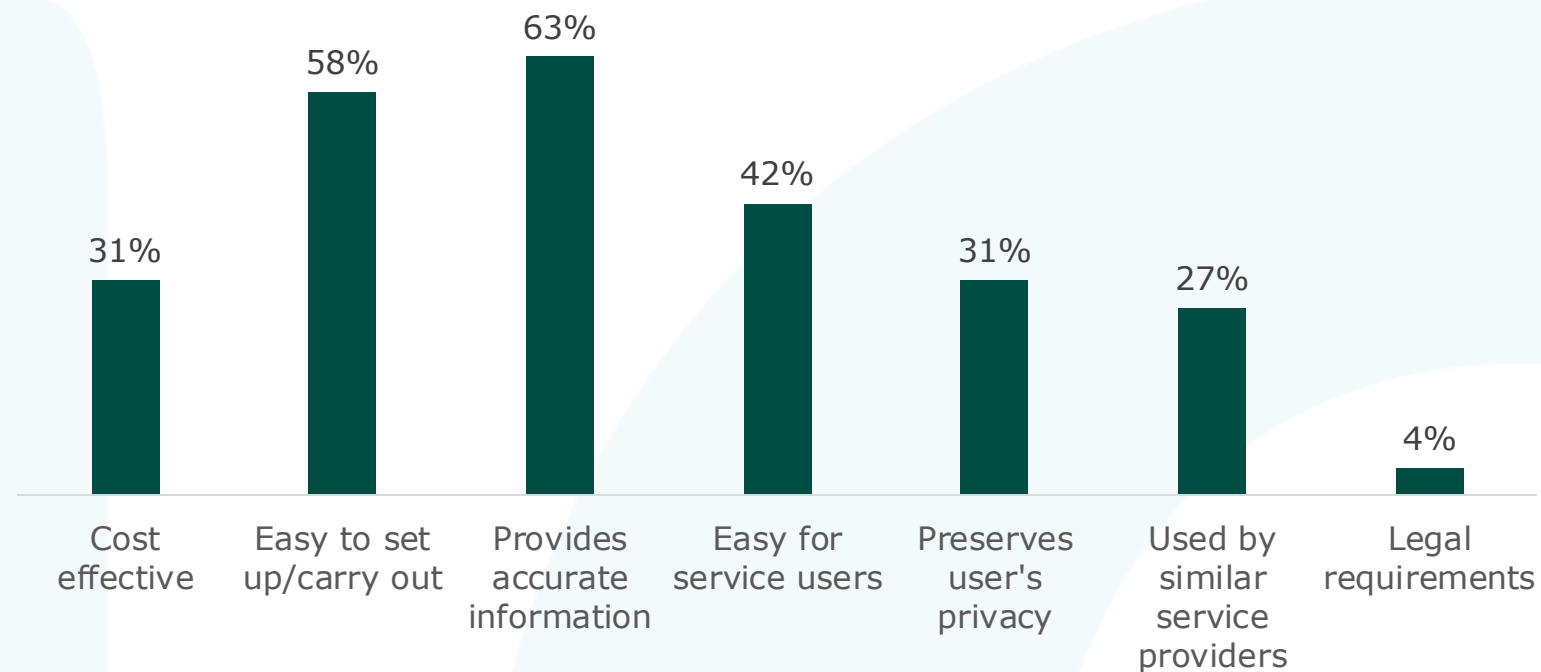
Photo identification biometric matching

Photo ID biometric matching: reasons for and against use

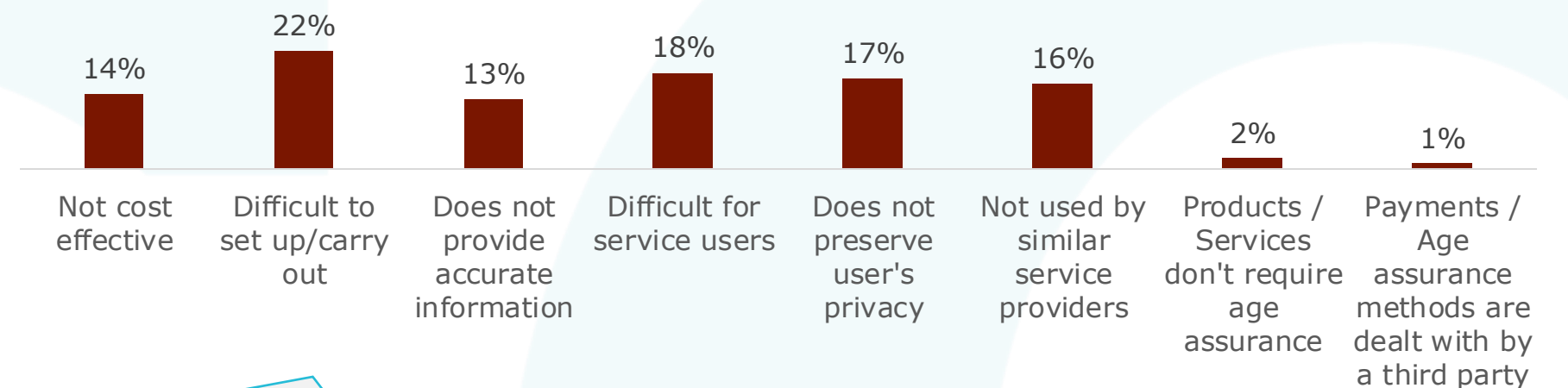
The most common reason given by those who **used photo identification biometric matching** for selecting this method was that it **provides accurate information (63%)**.

The most common reason given by those who **did not use** this measure was that it **is difficult to set up and carry out (22%)**.

Reasons for **using** this method



Reasons for **not using** this method



"You offload a photo of your passport. We check it against the photo that you provided, and then that ticks the box, and you know, you have **high certainty** of that level."

[Online dating]

"To ensure that we're being **compliant** in every way possible and also protecting our users."

[Social Media]

"Every additional step you add into the sign-up flow, **you will lose another percentage of people who you know give up at that point** or can't be bothered to find their passport or you think oh there's another app that's even easier to set up."

[Online dating]

"I think we've always just seen that as it's **too expensive** to kind of justify on what is ultimately a freemium app."

[Online dating]

B10- Why has your organisation chosen to use this or these methods? (All who use photo identification biometric matching: 48). This was a multiple-choice question; percentages will sum to more than 100%.

B11- Why has your organisation chosen not to use this or these methods? (All those who don't use photo identification biometric matching: 125, don't know- 21%, unknown recorded data - 16%). This was a multiple-choice question; percentages will sum to more than 100%.

Photo ID biometric matching: effectiveness

Amongst those organisations employing - or considering implementing - **photo identification biometric matching** as an age assurance method, the following factors were mentioned in the qualitative interviews:

- ✓ **Very accurate** – often employed to check suspicious users that fail initial, more rudimentary checks.
- ✗ **Bad user experience** – often a lot of hassle to find and upload the correct photo identification, plus the process can be quite slow to complete. This is often why it is only used for select suspicious users, rather than used as a blanket measure on all users trying to access age restricted content.
- ✗ **Not cost effective** – there are high set-up costs and there is a potential hit to revenue from lost users who are put off the service due to the perceived hassle of this measure.

"[Users] 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."

[Online gaming and gambling]

"If you are a payer on the app, you could upload your passport and then that's like an extra verification. But from my point of view that's kind of pointless because you know, most people who would be trying to join the app who are under 18 would not be premium users. "

[Online dating]

Of the 34 organisations in the survey who used this measure and assessed age assurance methods:

- **30** deemed photo identification biometric matching **EFFECTIVE**
- **3** deemed photo identification biometric matching **INEFFECTIVE**

Of the 6 organisations in the survey who used this measure but have not assessed age assurance methods:

- **4** deemed photo identification biometric matching **EFFECTIVE**
- **1** deemed photo identification biometric matching **INEFFECTIVE**



Of the 43 organisations in the survey who did not use this measure or assess age assurance methods:

- **24** deemed photo identification biometric matching **EFFECTIVE**
- **3** deemed photo identification biometric matching **INEFFECTIVE**

C2. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or age range of its users? (Base: All who use photo identification biometric matching and have assessed the effectiveness of the age assurance methods they use: 34)

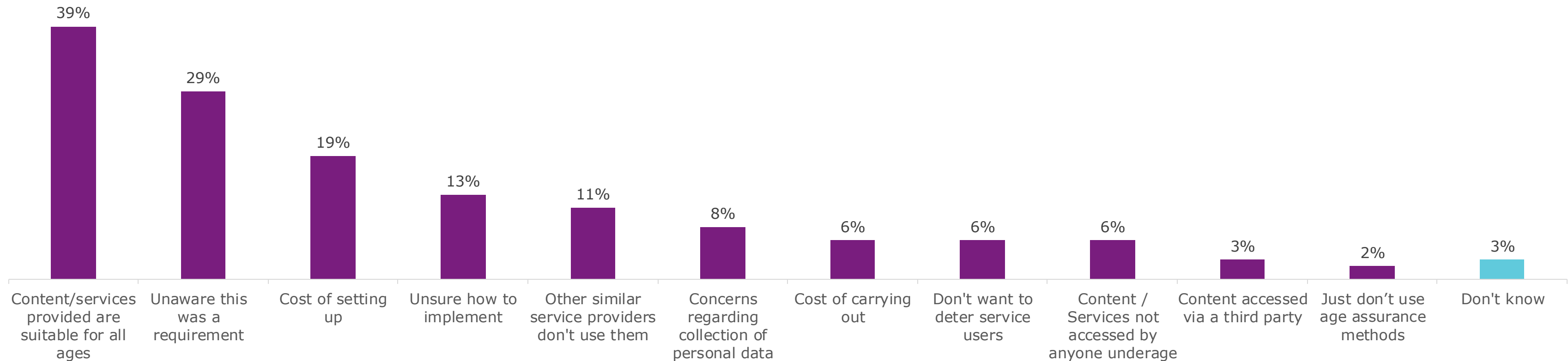
C3. How effective do you think the age assurance method(s) your organisation uses are at estimating or verifying the age or age range of its users? (All who use photo identification biometric matching and have not assessed the effectiveness of the age assurance methods they use: 6)

C4. Although your organisation does not use the following age assurance method(s), how effective do you think these methods are at determining the age or age range of its users? (All who do not use photo identification biometric matching or assess age assurance methods: 43)

Reasons for not using age assurance

Age assurance: reasons for not using age assurance

Main reasons provided by organisation as to why they do **not use** any age assurance method



The **most common** reason for not using any age assurance methods was the products / services offered were **suitable for all ages** (39%). Related to this, the second most common reason was organisations **did not think that implementing age assurance methods was a requirement** (29%).

Still, **almost a fifth** (19%) reported the **costs of setting up** were an issue that prevented them from being able to use age assurance measures.

Almost all organisations were clear on the barriers of implementation they faced, with only a small minority (3%) saying they did not know what the barriers were.

Common non-use factors – qualitative findings



Amongst some organisations there was a **lack of knowledge** on age assurance overall:

- Organisations were unaware of what was **legally required**
- There was uncertainty as to **how to implement** age assurances
- Amongst smaller businesses and start-ups, there was a lack of knowledge on where to even begin looking for information on age assurance
- Both large and small businesses would like to see **more guidance and support** on age assurance methods and proven methods of successful implementation

"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."

[Online dating]



As per the survey, some organisations we interviewed did not think that age assurance was a **necessary requirement**, based on the following reasons:

- Content/services are **suitable for all ages**
- Other **similar service providers** don't use them
- Content and services are **not accessed** by anyone underage
- They are **not mandatory** and simply constitute an additional cost

"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."

[Online gaming]



Despite the benefits of age assurance being clear, the **expense** related to implementing more accurate age assurances were discouraging:

- Cost of **set up**
- Cost to **maintain and use**
- **Loss of revenue** as users opt out of service due to checks

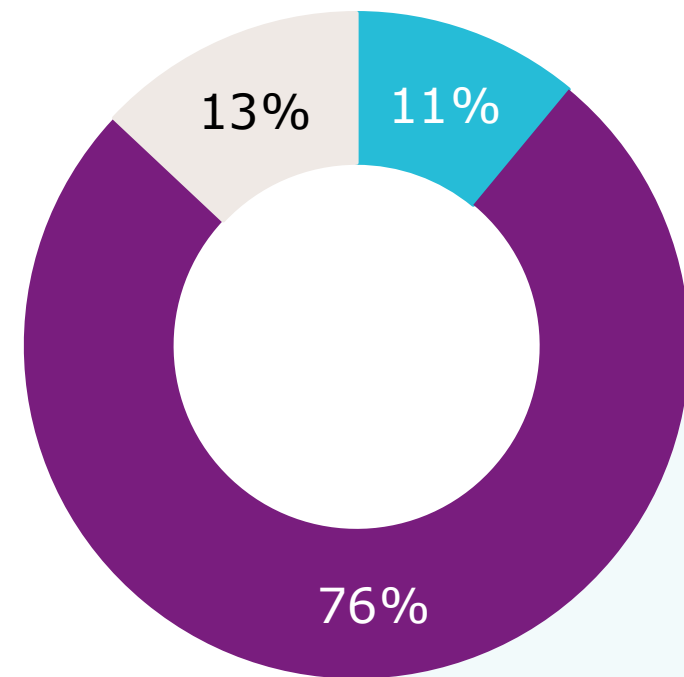
(Cost of set-up was the 3rd most common barrier identified in the quant survey.)

"[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."

[Online dating]

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

Do organisations have other systems in place?

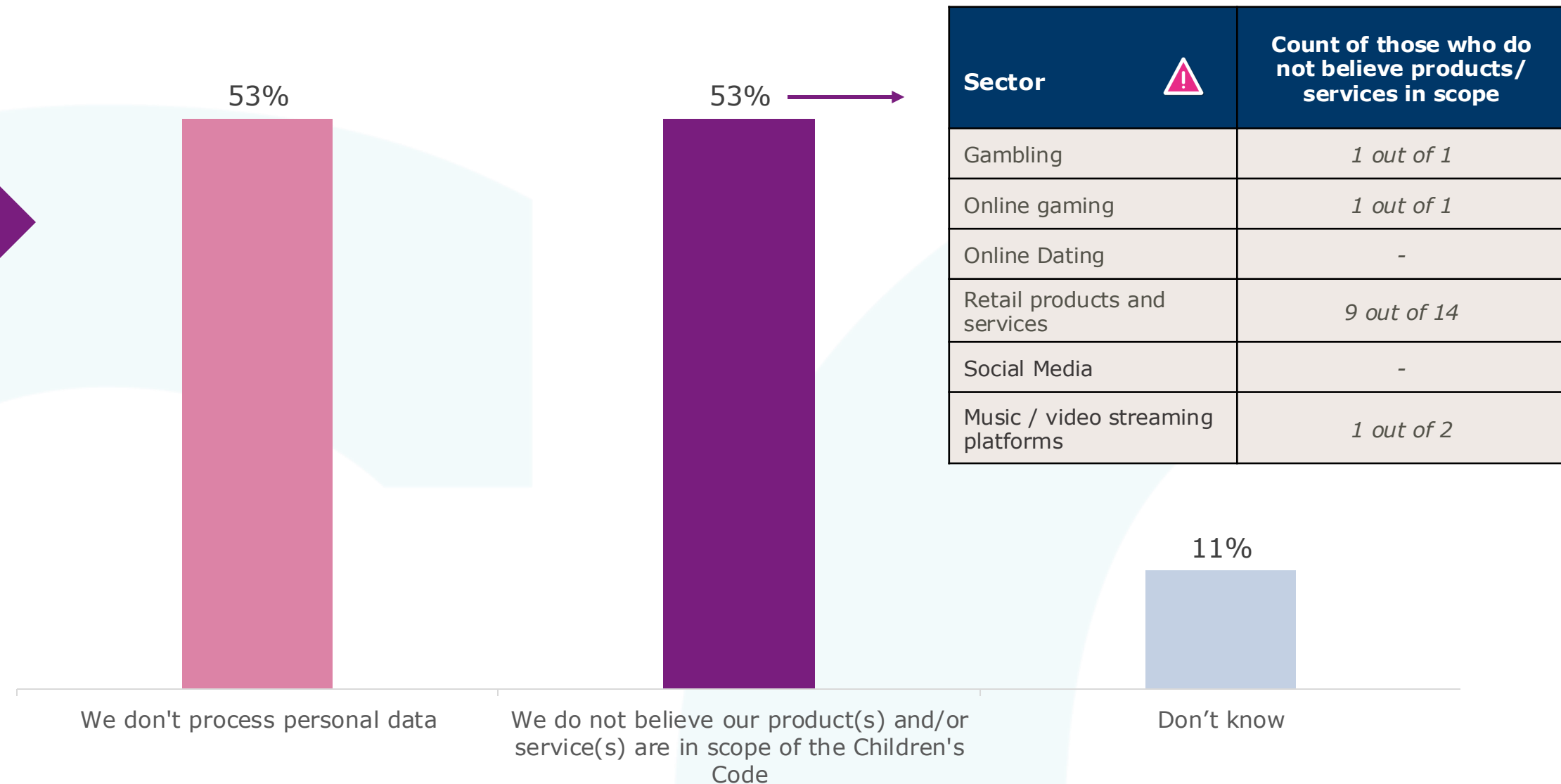


■ Yes ■ No ■ Don't know

Other systems used	Number
Apply standards of Children's code	6
Don't know	1
Total	7

B7-Do you have any other systems or processes in place to protect children's data online? (All who don't use age assurance methods: 62)
 B8- What other protections has your organisation put in place? (All who have other systems/processes in place to protect children's data online: 7) Due to low base size, percentages not used

Reasons for not having any other systems or processes in place



Sector	Count of those who do not believe products/services in scope
Gambling	1 out of 1
Online gaming	1 out of 1
Online Dating	-
Retail products and services	9 out of 14
Social Media	-
Music / video streaming platforms	1 out of 2

B9. Why does your organisation not have any other systems or processes in place to protect children's data online? (All who do not have other systems/processes in place to protect children's data online: 47). This was a multiple-choice question; percentages will sum to more than 100%.

Age Assurance: future implementation plans

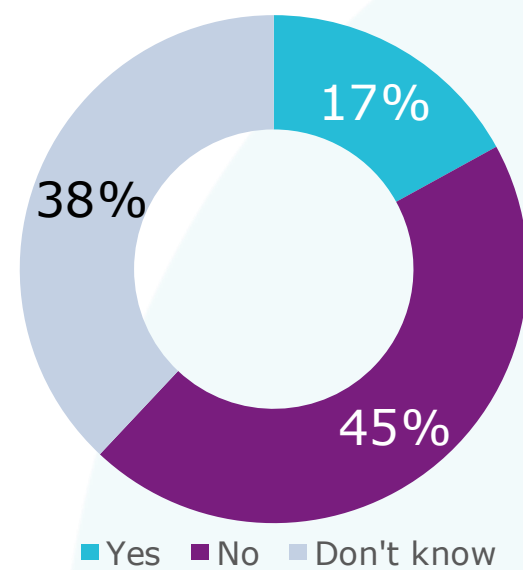
Less than a fifth (17%) of all organisations said they had plans to implement new age assurance methods in the future. Those **aware of the ICO** and those **aware of the Children's Code** were **more likely** to plan to implement new measures (25% and 24% respectively).

Those who **already had age assurance methods** in place were also **more likely** to plan to implement new ones (23%), whilst those without age assurance methods were more likely to say they had no plans to implement going forwards (65% versus 45% overall and 41% for those who had an age assurance in place).

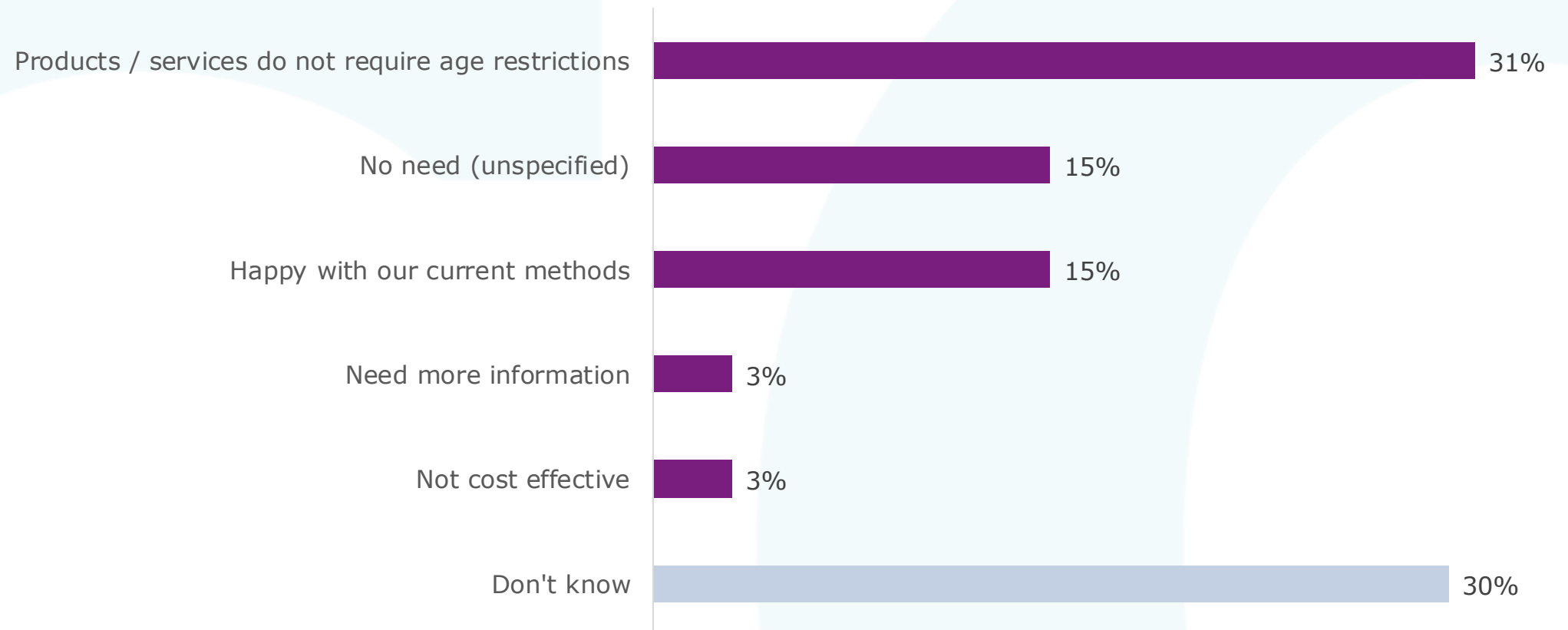
The **most common measure** that organisations were planning to implement was **family account holder confirmation**.

The **most common reason** for **not planning** to implement new or additional methods was that the products / services offered **did not require age restrictions**.

Plans to implement new / additional methods



Reasons for not planning to implement new/additional methods



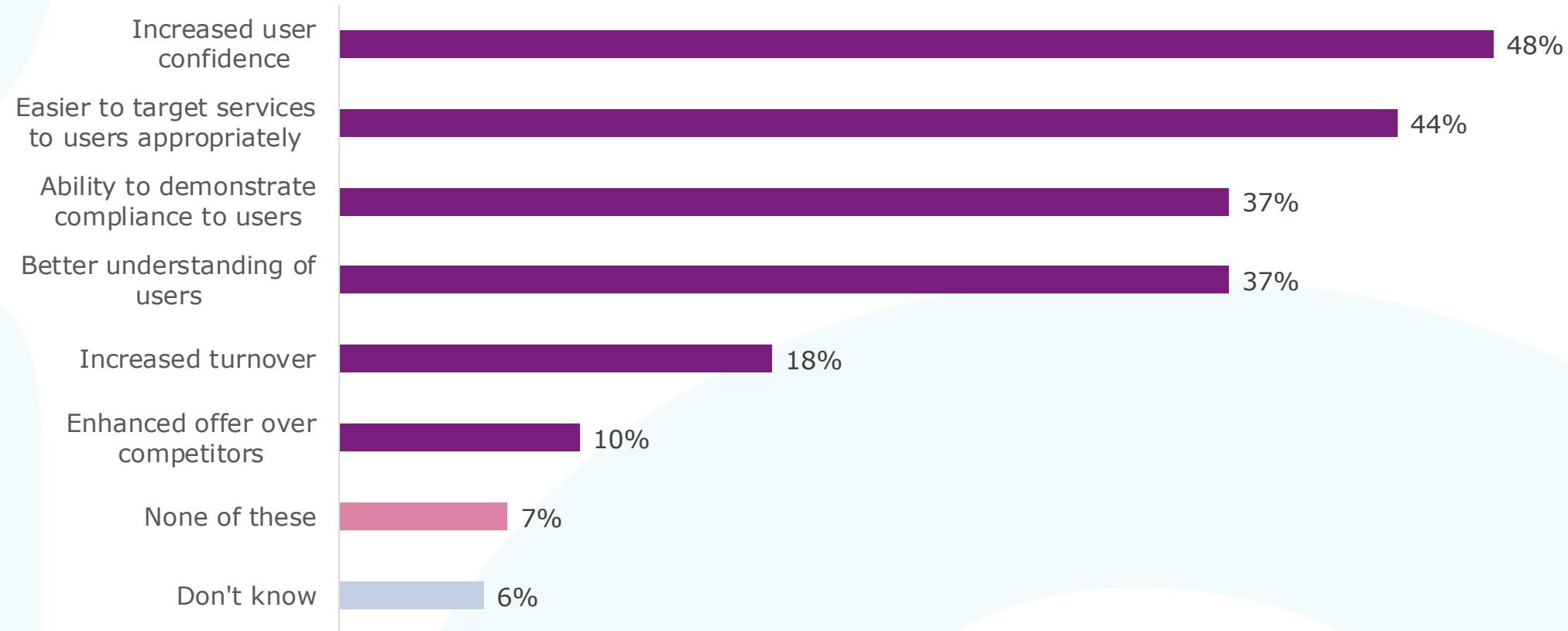
Top 3 most common measures planning to implement	%
Family account holder confirmation	32%
Payment card (credit card)	22%
Mobile Network Operator (MNO) 18+ content restriction filter	20%

C8- Does your organisation have any plans to implement any (additional) age assurance methods in the next 12-18 months? (All organisations: 235)
 C9- What age assurance methods does your organisation plan to implement in the future? (All with plans to implement additional age assurance methods: 41)
 C10- Can you tell us why not? (All without plans to implement additional age assurance methods: 105)

Costs and benefits

Age Assurance: benefits of implementation

Reported benefits of implementing age assurance



A **range** of benefits were reported by users of age assurance methods.

Increased user confidence was the most cited benefit of implementing age assurance methods.

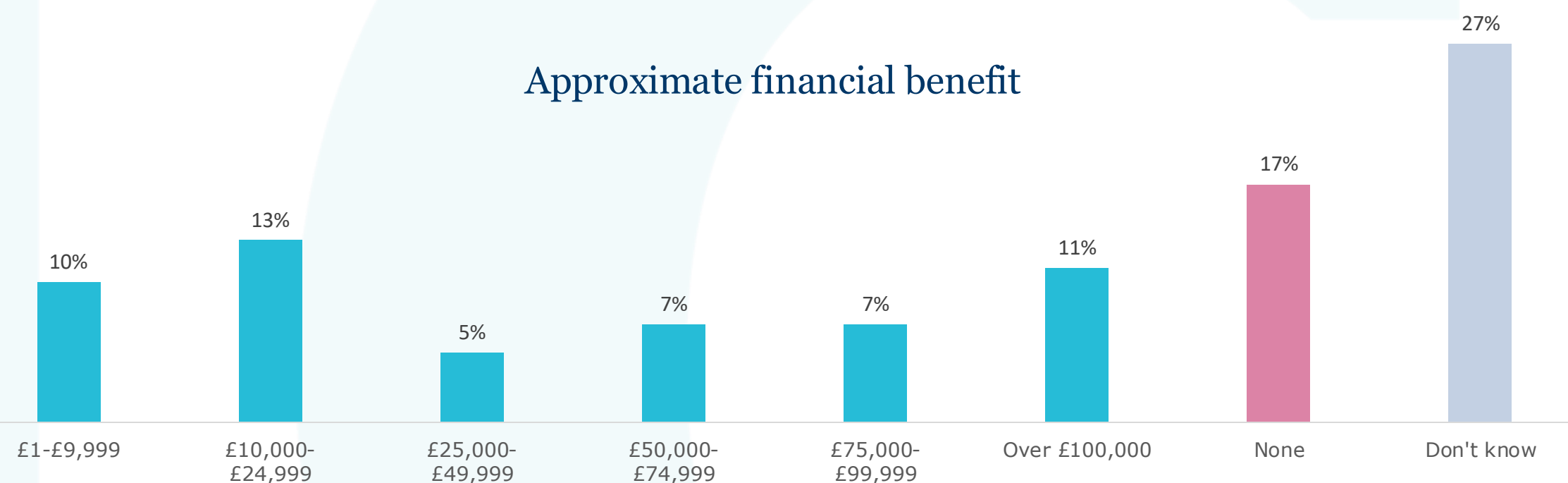
Only 7% of those who used age assurance methods reported that there were no benefits.

Of those who reported any benefit of implementing age assurance, **nearly a fifth (17%)** said there was **no financial benefit** associated with this.

Over a quarter (27%) said they **did not know** what the approximate financial benefit was.

11% reported an approximate benefit of **over £100,000**.

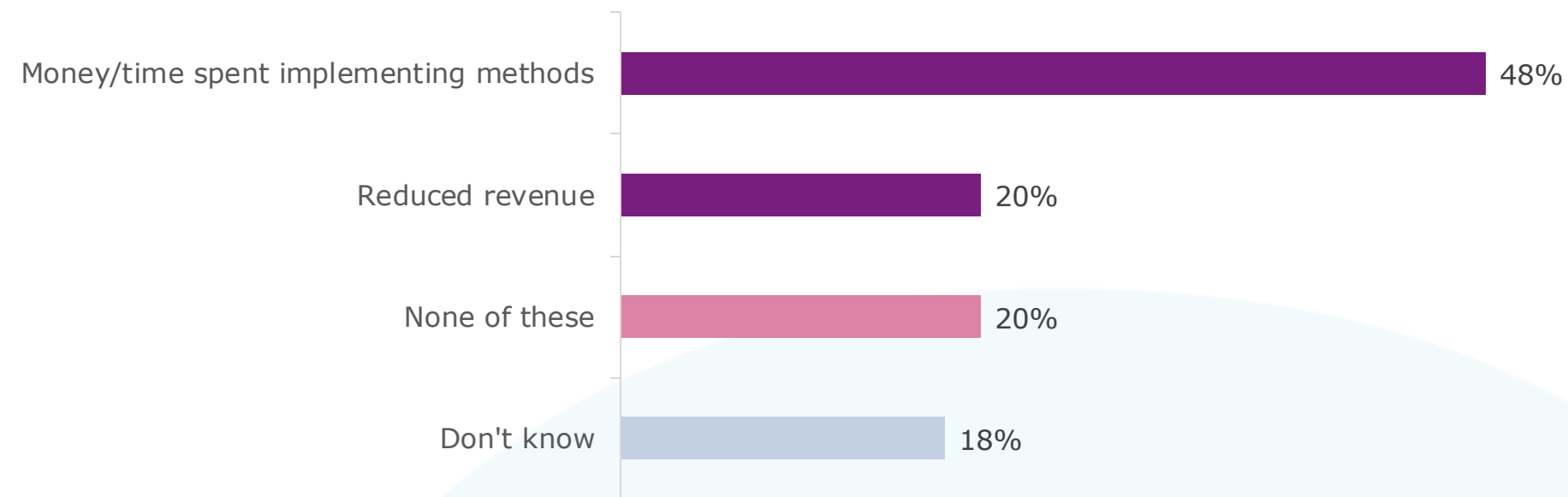
Approximate financial benefit



D1- What (if any) benefits has implementing age assurance methods brought to your organization? (All who use age assurance methods: 147) This was a multiple-choice question; percentages will sum to more than 100%.
 D3- What has been the approximate financial benefit of implementing age assurance methods for your organisation? (All who report a benefit of using age assurance methods: 127)

Age Assurance: costs of implementation

Reported costs of implementing age assurance

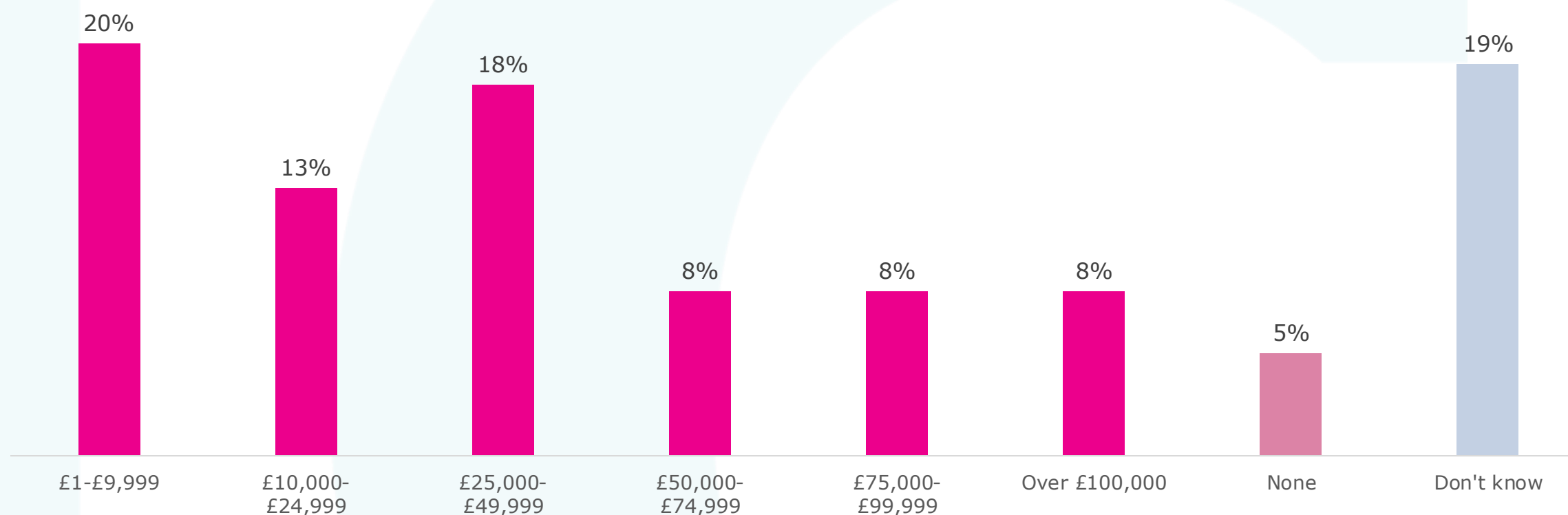


The most frequently cited expense of implementing age assurance was **the money / time spent on implementation**.

A fifth (20%) of those who used age assurance methods reported reduced revenue.

Whilst just **under a fifth (18%)** said they were unclear of the costs to their organisation.

Approximate financial cost



Amongst those who reported a cost, the financial cost associated tended to be below £50,000.

Nearly a fifth (19%) said they **did not know** what the approximate financial cost was.

8% reported an approximate cost of **over £100,000**.

ICO Impact

ICO Impact: awareness of ICO

Agreement: Awareness of ICO

Over half (52%) of all organisations said they were **aware** of the ICO and its work.

Those who were **using age assurance methods** were **more likely** to report being aware (61%).

Those who **planned to implement new age assurance methods** in the future were also **more likely** to report being aware (76%).

Of those who were aware, the **majority** agreed that:

- They were aware of the ICO's remit on upholding information rights
- ICO resources help provide clarity on the Children's Code
- ICO understands the issues organisations face when complying with the Code



52%

My organisation is aware of the ICO's remit to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals



The ICO resources provide clarity about what the Children's Code requires



The ICO understands the issues my organisation faces in complying with the Code



■ Strongly agree ■ Agree ■ Neither agree nor disagree ■ Disagree ■ Strongly disagree ■ Don't know

Summary:
Agree
90%

80%

80%

E1- To what extent would you agree with the following statement? Before completing this survey, I was aware of the ICO and its work (All organisations: 235)
E2- To what extent do you agree with the following statements? (All who are aware of the ICO and its work: 122)

ICO Impact: awareness of Children's Code

Over two thirds (67%) of all organisations said they were aware to some extent of the Children's Code.

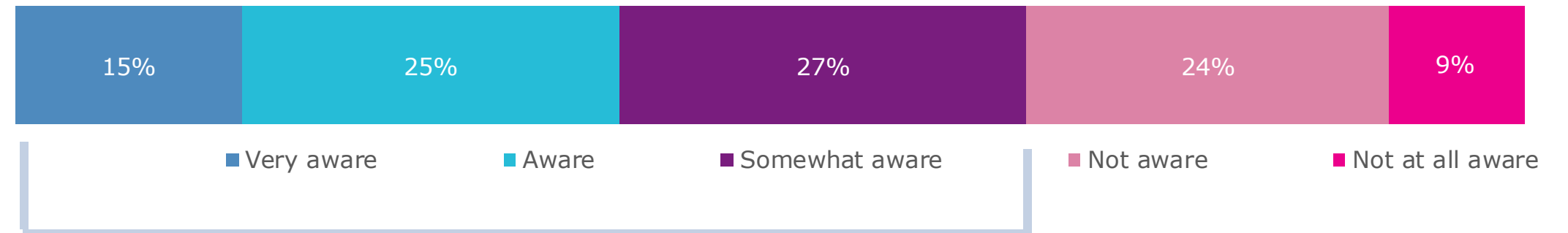
Organisations who currently **use age assurance methods** were **more likely** to report being aware of the Code (76% versus 61% without age assurance methods), as were those who **planned to implement new age assurance methods** in the future (90% versus 66% without plans to implement).

Those **aware of the ICO** and its work were also **more likely** to be aware of the Code (84% versus 32% who weren't aware of the ICO).

Of the organisations who were aware of the Code, the **majority** agreed that:

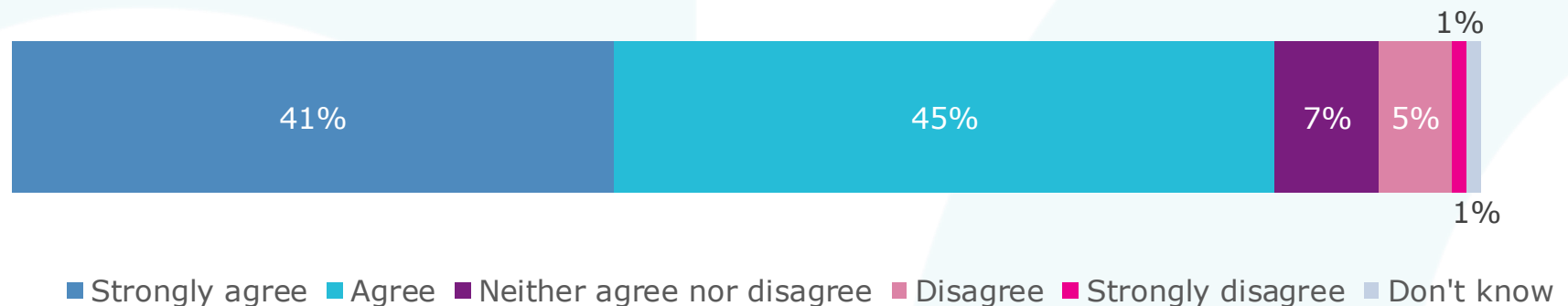
- Their organisation had a good understanding of the Code's standards under data protection law
- The products / services they offer are in scope of the Code

Awareness of Children's Code



67%

Agreement: Organisation has good understanding of Children's Code standards and obligations under data protection law*

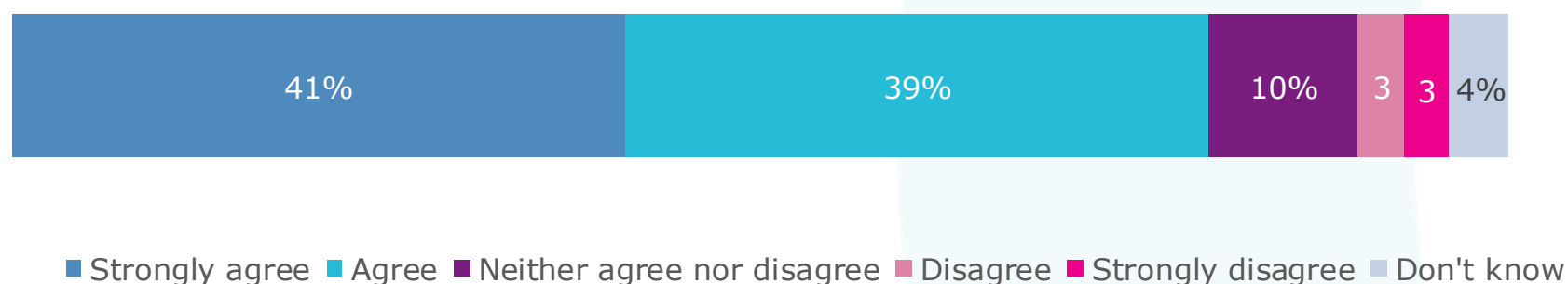


*Base: those who were aware of the Children's Code

Summary: Agree

86%

Agreement: Products or services are in scope of the Children's Code*



Summary: Agree

80%

A2- Before completing this survey how aware were you of the Children's Code? (All organisations: 235)

A3- To what extent do you agree that your organisation has a good level of understanding of the Children's Codes standards and your obligations under data protection law? (All who are aware of the Children's code: 157)

A4. To what extent do you agree that your products or services are in scope of the Children's Code? (All who are aware of the Children's code: 157)

Awareness of ICO and Children's Code – qualitative findings



While the quantitative survey indicated a relative strong comprehension of the Code, many of those who took part in the depth interviews felt they had a limited understanding of it and **did not know** where to access related guidance and information.



Some thought it would be beneficial for **information to be tailored** for big corporations, small corporations, and consumers themselves.

Others would like to be a part of **workshops** that focussed on the Code.

"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."

[Online dating]

"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."

[News and media]

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

[Music and video streaming]

"I'm not sure I would have ever known what the ICO is unless I was told specifically in the company to look for it."

[Online gaming]