Compliance Report:
Age Assurance and Use of Yoti as a Third-Party Provider

1. Purpose of this Document

This report outlines the age assurance measures implemented in accordance with **Ofcom's duties under the Online Safety Act**, specifically regarding the **requirement to keep written records** of age assurance systems and technologies. It also details the use of third-party age verification services provided by **Yoti**, including the methods employed, their application across relevant service areas, and the measures in place to protect user privacy.

2. Regulatory Context

Under the Online Safety Act and Ofcom's associated guidance, regulated online service providers are required to adopt **appropriate and proportionate age assurance measures** to mitigate the risk of harm to children from accessing age-inappropriate content. Ofcom further requires providers to:

- Implement **effective age assurance methods** (age estimation or verification).

- Maintain **accurate written records** of age assurance technologies and their deployment.

- Justify the **selection of specific methods** in the context of risk assessment and proportionality.

- Ensure that age assurance solutions comply with **UK GDPR and privacy regulations**.

- Be able to demonstrate, upon request, the **effectiveness and governance** of third-party providers used for this purpose.

3. Age Assurance Methods Provided by Yoti

Yoti is a certified third-party age verification provider offering a suite of age assurance technologies that support compliance with Ofcom's regulatory framework. The solutions provided are designed to balance effectiveness, user experience, and data privacy.

3.1 Facial Age Estimation

- **Technology**: Artificial intelligence model trained to estimate age based on facial imagery.

- **Process**: A user provides a selfie, which is analyzed in real time. No biometric data or images are stored after the age estimation process is completed.

- **Accuracy**: High accuracy across a wide range of age groups and demographics; regularly tested and validated.

- **Privacy**: Fully anonymous; complies with ICO and UK GDPR standards.

3.2 ID Document Verification

- **Technology**: Optical character recognition (OCR) and biometric matching to validate official identity documents (e.g., passports, driver's licences).

- **Process**: Users upload a government-issued ID along with a facial image for live verification.

- **Accuracy**: Provides a high assurance level; suitable for services requiring verified identity and age.

- **Data Handling**: Encrypted processing and transient data storage; no personal data is retained beyond the necessary verification moment, in accordance with UK data protection law.

3.3 Reusable Digital ID App (Yoti App)

- **Technology**: A secure mobile application enabling users to create and share verified credentials, including proof of age.

- **Use Case**: Minimizes friction during repeated age verification processes while ensuring robust compliance.

- **User Control**: Users manage the data they choose to share; verification tokens may be reused across multiple platforms without necessitating repeated data submissions.

4. Application of Yoti's Services

Yoti's age assurance tools have been seamlessly integrated into our service infrastructure to ensure compliance with age restriction mandates. Specific applications include:

- **Prevention of Underage Access**: Ensuring that age-restricted services—such as adult content or online gambling—are inaccessible to users below the required age thresholds.

- **Age-Based User Segmentation**: Enabling differentiated user experiences by categorizing users into appropriate age groups (e.g., under 13, under 18) based on verified information.

- **Tiered Content Controls**: Implementing content access controls and restrictions corresponding to the results of age verification.

- **Regulatory Reporting**: Facilitating compliance audits and reporting by maintaining transparent, anonymised logs of verification activities and outcomes, as supported by Yoti's reporting infrastructure.

5. Record-Keeping and Governance

In accordance with Ofcom's record-keeping duties, our governance framework includes the following:

- **Documentation**: Comprehensive records of all deployed age assurance systems, detailing technical specifications and deployment procedures.

- **Justification Reports**: Detailed assessments that justify the selection of Yoti as the third-party provider, including risk assessments and comparative analyses.

- **Verification Logs**: Secure storage of anonymised logs capturing verification activities (including performance metrics such as success and error rates) without retaining sensitive personal data.

- **Data Protection Impact Assessments (DPIAs)**: Regularly conducted DPIAs specific to each method deployed, ensuring continuous alignment with UK data protection standards.

- **Internal Reviews**: Routine audits and reviews to ensure that age assurance measures remain effective and compliant with any updated regulatory guidelines from Ofcom and data protection authorities.

6. User Privacy and Data Protection

A core tenet of our age assurance system is the rigorous protection of user privacy. The measures in place ensure that:

- **No Personal Data Storage**: At no point is any user's personal data stored beyond the transient period required for age verification. All biometric data, including facial images, are processed in real time and subsequently deleted.

- **Anonymisation**: Where possible, processes are designed to anonymise data to prevent any identification of individual users.

- **Data Encryption**: Data transmitted during the verification process is encrypted, safeguarding it

against potential breaches or unauthorised access.

- **Compliance**: All operations are aligned with the principles of UK GDPR, ensuring that every user's privacy is respected and protected throughout the verification process.

- **User Autonomy**: Users retain control over the sharing of their verification tokens and are empowered to manage their consent regarding the use of their temporary verification data.

7. Conclusion

The integration of Yoti's age assurance technologies reinforces our adherence to Ofcom's regulatory requirements. Their advanced, privacy-respecting methods facilitate effective age verification without compromising user data, ensuring both child safety and compliance with stringent data protection standards. Through robust documentation, rigorous governance, and continuous monitoring, we remain committed to maintaining a secure and compliant service environment.