

Onfido response to Ofcom first phase of online safety call for evidence

About Onfido

Onfido is a ten year old UK tech company that uses AI and biometric technology to provide identity verification services. Our ambition is to protect consumers from risk of harm by providing businesses from a range of sectors with our leading biometric and AI technologies to establish the legitimate online identity of the people accessing their services.

Many UK financial services companies including Barclays, TSB and Tesco Bank use Onfido services. They often rely on our solutions to help comply with their regulatory obligations associated with fraud prevention, in particular anti-money laundering and know-your-customer rules. We also provide services to companies in a wide range of other sectors including telecoms, gaming and online content providers.

We agree with the view of the Government that high-quality identity and age verification will help protect consumers from potential harm on a range of online services. With this in mind we have designed our products in such a way that they can be tailored to meet the different levels of identity verification and age assurance requirements of individual companies. We have set out further details of how this works below. With no one size fits all solution, our customers are able to layer solutions to build the knowledge and trust required to have appropriate levels of confidence that their customers are who they say they are.

Onfido firmly supports the ambitions of the Online Safety Bill to provide greater protection for children online, to empower users and to disrupt fraudsters. We are dedicated to building and providing technologies for services to verify the age and identity of their users accurately and with best-in-class user experience.

We welcome the opportunity to respond to this call for evidence and would be delighted to meet with colleagues at Ofcom to share further detail on how our technologies work and how we ensure privacy and security for our customers and their users.

Our response focuses on Question 22, as the most relevant to how Onfido's services can support tech platforms to accurately verify the age and identity of users to protect children, detect fraud and empower consumers.

Question 22 - what age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?

As currently drafted, the Online Safety Bill outlines how over 25,000 in-scope services that can be accessed by children must have proportionate systems and processes in place, such as age verification or age assurance, to prevent children from accessing illegal and harmful content. For category 1 services, there are additional requirements to comply with user empowerment duties through offering optional user verification and with fraudulent advertising duties through incorporating systems that prevent the risk of users encountering fraudulent advertisements.

Using modern technologies, such as AI and biometrics, can create trustworthy identity verification services that can be tailored to different types of tech businesses in order for them to comply with these requirements.

Below we outline our identity verification services that are available to platforms and how they interact with user privacy and data.

Onfido's services

Onfido's [Real Identity Platform](#)¹ combines document and biometrics verifications, data sources and fraud detection signals. This library of signals means that customers can choose the types and extent of verification they want to use, which may depend on risk appetite or regulatory requirements for example.

Our core offering involves document and biometric verification, in simple terms matching a user's face with a government-issued ID document. This is often used by financial services providers to meet "know-your-customer" requirements, but is also widely used in other sectors as a very swift, accurate and efficient way to verify identity. It also offers a very attractive user experience, with the whole process typically taking a matter of seconds.

Furthermore, Onfido's services are designed to be adaptable for smaller businesses that may have limited resource and capacity, but may still be required to use age estimation and assurance technologies as part of their child safety duties. We work

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https://onfido.com/solutions/our-solutions/?utm_source=adwords&utm_medium=display&utm_campaign=identitylaunch

with a very wide range of different sized companies, including SME challenger banks, crypto start ups and small platform companies such as [Fundof](#). An extensive list of case studies on how businesses are using Onfido's services can be found on its website.²

IDV and privacy-by-design

There is often a misconception that age assurance and age verification technologies are somehow at odds with users' right to privacy and data collection. However the use of modern technologies such as biometric verification do not require a trade off between privacy, security and accurate verification.

Responsible IDV providers are using privacy-by-design approaches and do not need to store data any longer than is needed to perform the verification. Many of our customers are highly regulated themselves, and rightly hold us to extremely high standards in relation to privacy and security. We are regularly audited by customers in order to evidence this. The IDV market is highly competitive, and therefore being able to demonstrate best-in-class practices to prospective customers can confer a competitive advantage.

The Government has also recently introduced a beta version of the new UK "digital and attributes trust framework" which is designed to establish trust in digital identity products in the UK. This framework sets rigorous standards for providers, including in relation to privacy and security, and requires regular external audits.

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https://onfido.com/solutions/our-solutions/?utm_source=adwords&utm_medium=display&utm_campaign=identitylaunch

We will soon see this framework enshrined in primary legislation through the passing of the Data Protection and Digital Information Bill, so privacy and security will be an integral part of the digital identity regulatory framework.

We would therefore suggest that, far from eroding privacy and security, the regulatory and market dynamics *enhance* such user rights, and quite rightly so.

Addressing inclusivity in IDV

Onfido acknowledges its responsibility as an identity verification provider to support inclusivity and to address bias in AI. We firmly support the Government's view that identity verification should be accessible for a range of audiences.³

We invest heavily in inclusivity, and in particular ensuring our services are accessible to vulnerable users. We regularly test our services with visually impaired groups, and are proud that recently the Digital Accessibility Centre (DAC) awarded us a [Certificate of Accreditation](#) for our Onfido Smart Capture SDKs, verifying WCAG 2.1 compliance to level AA.

Biometrics technology also offers a means to verify or estimate age without needing to supply identity verification documents, such as a Passport or Driving License, that a younger person may not have. As well as needing to provide less personal information, it also means that younger users can benefit from a very low-friction verification process.

³<https://www.gov.uk/government/publications/uk-digital-identity-attributes-trust-framework-updated-version/uk-digital-identity-and-attributes-trust-framework-alpha-version-2#benefits-for-users>

We have also done pioneering work in the field of AI bias, having worked with the ICO in a sandbox looking at related privacy issues⁴, and publishing academic papers. We will shortly be publishing a major new White Paper on the subject of bias which we would be delighted to share with Ofcom.

IDV and fraud

Onfido supports customers in preventing fraud and deterring bad actors. While fraud can take many forms, a requirement for users to verify their identity to a high level of assurance is a huge deterrent and acts to prevent all but the most determined and sophisticated fraudsters.

[Onfido's latest Identity Fraud Report 2022](#)⁵ highlights why we must stay alert to the growing threat of identity fraud. The data reflects the greater amount of time spent online by people around the world. Put simply, more online activity creates more opportunities for fraudsters.

We believe that identity verification based on AI and biometric technology has the potential to enhance the security of platforms and help consumers experience less harm and more trustworthy interactions online.

We would be delighted to meet with Ofcom to outline how we are working with the FCA and financial services to combat fraud, and to see if any of the technologies we use can support Ofcom's enforcement of the fraudulent advertising duties in the Online Safety Bill.

⁴ <https://ico.org.uk/media/for-organisations/documents/2618551/onfido-sandbox-report.pdf>

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https://onfido.com/landing/identity-fraud-report/?utm_source=organic&utm_medium=linkedin&utm_campaign=Identity+Fraud+Report+2022

