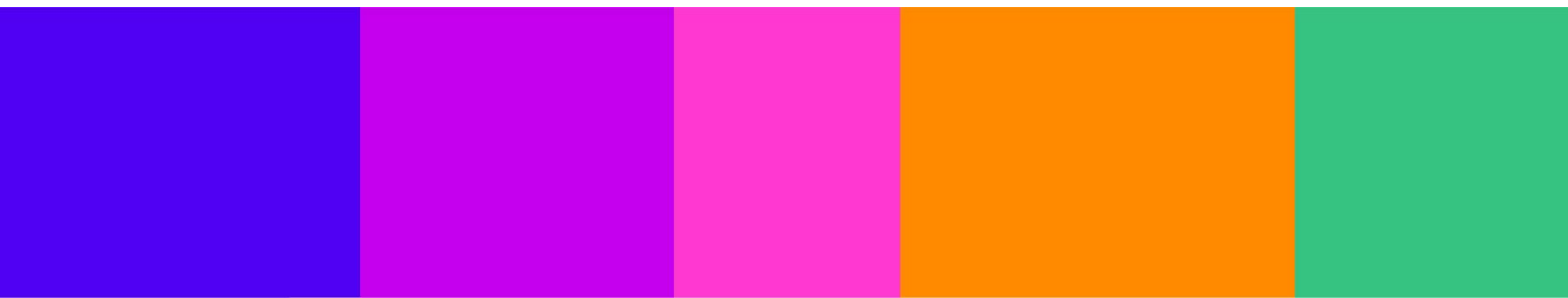# Consultation response form

Please complete this form in full and return to protectingchildren@ofcom.org.uk.

Consultation title	Consultation: Protecting children from harms online
Organisation name	OneID

Your response

Question	Your response
Volume 4: How should services assess the risk of online harms? **Governance and Accountability (Section 11)**	
15. Do you agree with the proposed governance measures to be included in the Children's Safety Codes? a) Please confirm which proposed measure your views relate to and explain your views and provide any arguments and supporting evidence. b) If you responded to our Illegal Harms Consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response. 16. Do you agree with our assumption that the proposed governance measures for Children's Safety Codes could be implemented through the same process as the equivalent draft Illegal Content Codes?	Confidential? – N 15) Yes, OneID agrees with the governance measures included in the Children's Safety Codes. 16) Yes, the same process could cover both Illegal Content and Chidren's Safety Codes, as many of the measures are similar in nature, and the mapping tables provided make cross-referencing simpler.
Volume 5 – What should services do to mitigate the risk of online harms **Our proposals for the Children's Safety Codes (Section 13)**	
Proposed measures 22. Do you agree with our proposed package of measures for the first Children's Safety Codes? a) If not, please explain why. **Evidence gathering for future work.**	Confidential? – N 22) Yes, OneID agrees with the package of measures included in the Children's Safety Codes.

Age assurance measures (Section 15)

31. Do you agree with our proposal to recommend the use of highly effective age assurance to support Measures AA1-6? Please provide any information or evidence to support your views.

 a) Are there any cases in which HEAA may not be appropriate and proportionate?

 b) In this case, are there alternative approaches to age assurance which would be better suited?

32. Do you agree with the scope of the services captured by AA1-6?

33. Do you have any information or evidence on different ways that services could use highly effective age assurance to meet the outcome that children are prevented from encountering identified PPC, or protected from encountering identified PC under Measures AA3 and AA4, respectively?

34. Do you have any comments on our assessment of the implications of the proposed Measures AA1-6 on children, adults or services?

 a) Please provide any supporting information or evidence in support of your views.

35. Do you have any information or evidence on other ways that services could consider different age groups when using age assurance to protect children in age groups judged to be at risk of harm from encountering PC?

Confidential? – N

31) OneID agrees that HEAA should be used to either:

i) enable platforms to declare that they cannot be accessed by children, or,
ii) if children are allowed on the platforms, for them to understand which of their users are children (and their age range) so that content visibility can be tailored appropriately.

32) Yes, we agree with the scope of services. One question we have is; what happens if a service prohibits PPC and PC by its policies, but it is still posted by users? This seems to be a gap in the criteria, and different to the existing criteria of:

- Primary purpose is PPC or PC
- Permits PPC or PC in policies

33) OneID has three age verification methods that allow someone to prove their age online;

- Bank login
- Reusable digital ID wallet
- ID document scan and selfie

The bank login method, which is OneID's core product, enables easy and secure ID Verification and Age Verification, with a few clicks and a bank login to an app or online banking service. This is a simple method that 90% of UK adults can use, and can be configured to share just an 'age over' token, e.g. 'age over 16' or 'age over 18', and nothing else.

Age assurance methods that can be highly effective include reusable digital ID wallets, that store ID data for individuals that has been previously verified to be correct. These wallets can also be used to store and share just an 'age over' token.

The assertion in Volume 5, item 15.73 that '*All methods of age assurance will inevitably involve the processing of personal data of individuals, including children*', may be

	technically correct in that an 'age over' token is legally personal data, but this method does not compromise privacy in any way, as the site the user is accessing does not have any ID details at all. Some users may prefer sharing an 'age over' token to having their facial image taken for age estimation, and see the token method as being more private.
	The ID scan and selfie method can be used for AV (and still allows for sharing only an 'age over' token), but the user experience is better suited for use cases where:
	- document evidence is required, such as the Home Office Right to Work/Rent schemes, - users do not have bank accounts and need to scan a document, - global onboarding where users do not have a home nation digital ID connected to the OneID Access Network.

User support (Section 21)

53. Do you agree with the proposed user support measures to be included in the Children's Safety Codes? a) Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence. b) If you responded to our Illegal harms consultation and this is relevant to your response here, please signpost to the relevant parts of your prior response.	Confidential? – N 53) Yes, OneID agrees with the proposed user support measures. Children should have the tools available to make their own informed choices and protect themselves by default.

Combined Impact Assessment (Section 23)

58. Do you agree that our package of proposed measures is proportionate, taking into account the impact on children's safety online as well as the implications on different kinds of services?	Confidential? – N 58) Yes, OneID agrees that the package of measures is proportionate.

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