

Lord Alton
Chair, Joint Committee on Human Rights
House of Commons
London SW1A 2AA

16 March 2026

Dear Lord Alton,

Ref. Inquiry on Human Rights and AI Regulation

Many thanks for the opportunity to give oral evidence to your Committee inquiry on human rights and the regulation of AI. Ginny Badanes was delighted to meet the Committee and share Microsoft's perspective on the fundamental importance of embedding human rights in the development and deployment of responsible AI and our approach to responsible AI and building trust with communities, industries and governments around the world. We promised to follow up with the Committee on lessons learned in the rollout of age verification on Xbox as well as our view on how age restrictions may impact children's human rights.

Potential impact of age restrictions on child rights

Age restrictions for online services can play a role in protecting children from exposure to inappropriate content or features, but they also engage a range of children's and adults' rights that require careful balancing. These measures must be designed and implemented carefully to avoid unintended or disproportionate impacts. To understand children's perspectives on these topics, we last year partnered with Praesidio Safeguarding to conduct research on age assurance methods in the U.K., Ghana, and Indonesia. The Committee can find the report [here](#).

From a child rights perspective, blanket age restrictions risk oversimplifying children's online experiences by treating access as binary, rather than reflecting differences in risks and benefits by service, feature, and age group. Overly broad age limits can unintentionally restrict children's rights to access information, education, creativity, and social participation - particularly where

services provide meaningful benefits and where risks could instead be mitigated through age-appropriate design, defaults, and safeguards rather than outright exclusion.

Age-based access restrictions, or specific verification methodologies can also disproportionately affect certain groups of children, including those without formal identification, those in shared-device households, or those in vulnerable circumstances, leading to exclusion from lawful services. For older adolescents, strict age cutoffs may undermine developing autonomy and privacy by limiting opportunities for independent participation online, even where risks are comparatively low or manageable. These impacts highlight the importance of ensuring that age restrictions are not used as a sole proxy for safety. Indeed, a range of capabilities, utilized with guidance and oversight from parents and caregivers, can offer more targeted, proportionate measures to better support children's evolving capacities.

Age restrictions also affect adult users' rights, particularly where age limits are applied broadly across services or features that pose limited risk. Restricting access to lawful online services or requiring additional steps to demonstrate eligibility without clear risk-based justification can raise concerns around privacy, freedom of expression, and access to information. Without such, adults may be required to verify their age to access low-risk or nonsensitive features, increasing data collection and friction without commensurate safety benefits. While age verification technologies and approaches are evolving, there are still real challenges, such as accessibility issues for some communities, and there have been recent data breaches reported publicly.

A proportionate approach where age limits are clearly linked to specific, evidence-based risks and narrowly applied to higher risk services or functionalities can help ensure that child protection objectives are met without unnecessarily restricting the rights of children or adults. We have also shared this perspective in a recent blogpost, which can be found [here](#).

Age verification – Lessons learned

Xbox introduced age verification for the first time in the UK in July 2025 as part of our compliance programme for the UK Online Safety Act, following earlier pilots with Xbox Insiders in the United States. Implementing age verification at scale on a gaming platform has provided several important lessons that we believe are relevant for policymakers and regulators considering similar approaches.

First, user-centred design, choice and proportionality for the verification experience itself are critical to adoption and trust. Rather than relying on a single verification method, Xbox offered UK users a menu of age verification options through a trusted third-party provider, Yoti, including facial age estimation, government issued ID, mobile phone verification, and credit card checks. Allowing users to choose the method that best suited their circumstances helped reduce friction, increased completion rates, and addressed concerns that a "one size fits all" approach would exclude some users or create unnecessary barriers. As another key design choice, the initial user communications and support article utilized a QR code, facilitating convenient access to the verification sequence from a mobile device. On the whole, this experience reinforced the importance of placing the customer first and offering flexibility and usability in age assurance

frameworks. We also found that, while we had anticipated users might prefer to use credit cards, more users elected to use facial age estimation.

Second, privacy by design materially affects public acceptance. A key lesson was the need to clearly separate *age* verification from *identity* verification wherever possible. Xbox receives only a binary confirmation of whether a user is 18 or over; no underlying identity data or biometric information is shared to Xbox by the verification provider, and data used by the verification provider is deleted once the check is complete. Clear, repeated communication about these safeguards proved essential in addressing user concerns and misinformation, particularly in the early stages of rollout.

Third, phased implementation and advance communication reduce disruption and helped to build trust. Xbox deliberately adopted a gradual rollout: age verification was initially optional, supported by several months of proactive communication across Xbox Wire, support pages, in-product messaging, and targeted emails. Only later in the process were system interrupts utilized and feature restrictions applied to adult accounts that elected not to verify. This approach gave users time to understand the change, prepare, and complete verification at their own pace, and it reduced the risk of sudden loss of access to social features. The experience highlighted the value of transition periods when introducing new safety obligations. Phased implementation can also ensure there are no technical challenges and avoid the risk of delays or outages through heavy demand.

Fourth, tailored approaches can be more rights-respecting than blanket service denial. Rather than blocking access to games or purchases, Xbox limited the consequence of not verifying to restricting specific social features that may create risks for minors —such as voice and text chat with nonfriends, adding friends, sharing and viewing user-generated content. This approach respected prior purchases, and helped preserve core gameplay while ensuring that safeguards were meaningfully tied to risk. One lesson was that targeted, risk-based restrictions are better understood by users and more defensible than broad access bans—especially for services where consumers have invested lots of time, energy and money. Implementing age verification at the service level also ensures the additional information from users is clearly tied to the specific safeguards.

Fifth, consistency across the sector affects both user perception and effectiveness. Xbox's experience showed that when age verification is implemented unevenly across similar services, users may perceive it as a discretionary or competitive choice rather than a safety measure. This can create confusion about regulatory expectations and undermine trust. Greater clarity and alignment across services can support more consistent outcomes for users and regulators alike.

Finally, age verification is not a standalone solution. Xbox's implementation reinforced that age verification works best as part of a broader safety system that includes age-appropriate defaults, parental controls, content moderation, reporting and enforcement tools, and ongoing user education. Verification alone does not address all risks, but it can meaningfully strengthen the application of existing protections when deployed thoughtfully and proportionately.

Taken together, Xbox's first experience with age verification underscores that effective age assurance depends as much on design choices, communication, and trust as on the underlying



technology. These lessons have informed Xbox's ongoing evaluation and improvement of age assurance solutions in the UK and other markets, and our continued engagement with regulators on practical, user-centred approaches to online safety.

Thank you again for the opportunity to contribute to the Committee's inquiry and please do not hesitate to contact me should you want clarification on any of these topics.

Yours sincerely,

A handwritten signature in blue ink, reading "Hugh Milward".

Hugh Milward

Vice President, Corporate Affairs, Microsoft UK and Ireland