

Dame Chi Onwurah
Chair, Committee on Science and Technology
House of Commons
London
SW1A 0AA

16 March 2026

Dear Dame Chi and Members,

At your hearing on 11 March you heard from witnesses primarily on the pros and cons of introducing a minimum age for social media. The Committee kindly invited us to write to add to the its understanding with additional technical information about how such a policy would be implemented in practice.

We are the global trade association for suppliers of online age assurance solutions – age verification, age estimation and age inference – that would be required to enforce any minimum age requirement for social media, or indeed any policy applying different protections based on a user’s age. As a trade association representing providers of different technical approaches, our role is not to advocate for a particular policy outcome such as a specific minimum age: Rather, our purpose is to ensure that Parliament and regulators have an accurate understanding of the capabilities and limitations of the technologies that would be used to implement any age-related policy.

Sometimes opponents of stronger protections for children online claim that it is not technically possible to verify a user’s age online, or that doing so inevitably requires intrusive collection of personal data and therefore undermines privacy. Others argue that age checks are easily circumvented through tools such as virtual private networks or simple spoofing techniques. We write to reassure the Committee that modern age assurance technologies are capable of addressing these concerns, so that policy decisions can be taken based on the merits of protecting children online rather than misconceptions about the technology that enables such policies.

You heard from Julie Inman-Grant PSM, Australia’s eSafety Commissioner, that the first ten weeks of implementation of Australia’s 16+ social media policy are already showing encouraging results. The Australian Government adopted this approach after commissioning the most extensive independent audit of age assurance technologies undertaken anywhere in the world. The principal conclusion of the year-long Age Assurance Technology Trial was that “Age Assurance can be done”¹. In her evidence to you, the Commissioner summarised the findings by stating that the technologies are “effective, robust, and can be accurate and privacy preserving”.

¹ www.ageassurance.com.au

Recent reporting indicates that around 20 percent of 13 to 15 year olds in Australia still report having a social media account.² Our view is that this likely reflects platforms choosing approaches designed to minimise user friction rather than comprehensively checking all users at the outset. In other words, the present challenge appears to be not too much age assurance but too little. Nevertheless, the policy has only been in force for a matter of weeks, so it would be premature to draw firm conclusions at this stage.

It is also worth noting that the United Kingdom already requires *highly effective age assurance* for certain categories of harmful content under the Online Safety Act, including pornography and content encouraging self-harm or suicide. This regime came into force in August last year. It has now settled into operation and has generated little media coverage and, as far as our members are aware, no significant volume of ongoing complaints from users. There were some minor technical issues in the first few days of implementation, which is not unusual for any new digital system deployed at scale, but these were resolved quickly. As with any security technology, providers continue to monitor and respond to new forms of circumvention as they emerge.

Building on this foundation, both the Information Commissioner's Office and Ofcom wrote to leading social media platforms last week asking them to explain how they enforce their existing minimum age of 13. This indicates that UK regulators already have confidence that age assurance technologies can support enforcement where platforms choose to deploy them, including at ages below 18.

However, the Committee should be aware that checking whether someone is above or below an age threshold below 18 is inherently more challenging than verifying that someone is an adult. Adults typically have multiple authoritative data sources that can confirm their age – such as passports, driving licences, bank accounts, credit records or electoral roll entries. Younger users often do not.

As a result, policy choices must balance enforcement accuracy with usability, accessibility and fairness for legitimate users.

Age estimation technologies are central to the scalable and privacy-preserving operation of modern age assurance systems, because they allow the vast majority of adult users to pass an age check quickly without needing to provide identity documents or other sensitive information. In practice, the majority of users will initially pass through age estimation or inference checks. Modern facial age estimation technologies typically achieve accuracy within one to two years of a person's actual age. Other approaches, such as analysing metadata associated with an email address or mobile number, can also provide strong age signals.

However, estimation systems will inevitably produce both false positives and false negatives:

- False positives occur when children under the minimum age are incorrectly estimated to be above it.
- False negatives occur when users who are legitimately above the threshold are incorrectly flagged as underage.

This creates an important policy choice about how the system should be calibrated.

² <https://www.reuters.com/business/media-telecom/one-fifth-australian-teens-still-use-tiktok-snapchat-after-social-media-ban-2026-03-13/>

If the priority is to minimise false positives and therefore prevent almost all underage users from gaining access, the estimation threshold can be set above the legal age. For example, instead of estimating whether a user is over 16, the system might estimate whether they are over 18. This significantly reduces the likelihood that someone under 16 will pass the test. The trade-off is that many legitimate 16 and 17 year-old users will initially fail the estimate and will need to complete an age verification step to prove their exact age. For some users this will be straightforward, using a passport, driving licence or bank-based age check. Where those are unavailable, schemes such as the UK Proof of Age Standards Scheme provide professional attestation routes where teachers, doctors or other trusted professionals can confirm a young person's age.³

An alternative policy choice is to minimise false negatives by setting the estimation threshold below the legal age. For example, the system might test whether a user appears to be over 14. Almost all legitimate users over 16 would pass such a test without friction. However, this approach inevitably allows a proportion of underage users to gain access initially. Platforms may then rely on behavioural signals over time to identify accounts likely to belong to younger users, based on interactions, language or social graph patterns, and refer those users for further age checks.

In the long term, the most reliable way to resolve this policy tension is to supplement estimation technologies with access to authoritative data sources that can confirm the age of younger users where estimation alone cannot provide a sufficiently precise answer.

Governments are uniquely placed to enable this because they hold trusted records relating to citizens' ages through systems such as health, education or benefits databases. Properly designed, such systems can strengthen privacy protections rather than weaken them, because they allow age to be confirmed directly against authoritative records without requiring users to share identity documents or other sensitive personal data with online services.

In the United Kingdom, the recent Data (Use and Access) Act provides a framework through which this could be done in a tightly controlled and privacy-preserving manner. We are currently engaging with the Department for Science, Innovation and Technology on the possibility of pilot programmes allowing certified Digital Verification Services operating under the Act to query government-held data. Under this model, a user would supply their date of birth as part of an age verification process and the verification service could submit a query to confirm whether the data provided matches the authoritative government record. The response would simply confirm "yes" or "no". It would not disclose the date of birth held by the government database. This approach is sometimes referred to as a one-way blind check.

The system would operate under the statutory framework established by the Data (Use and Access) Act and oversight by the Office for Digital Identities and Attributes within DSIT. Importantly, the verification service would not gain access to the underlying government database itself, nor would any additional personal data be disclosed. This carefully controlled mechanism for confirming data against authoritative government records has not yet been deployed at scale in the UK. Age checks represent one of the clearest and most socially beneficial use cases for early implementation.

³ <https://www.citizencard.com/>

The Committee could therefore play a helpful role in ensuring that Parliament understands the practical realities of implementing age-based online protections. In particular, it may wish to recommend that government consider how access to authoritative age data can support accurate verification for users close to any legal age threshold that Parliament may introduce. Age estimation technologies are highly effective for the majority of users, but for individuals close to the threshold – such as 15, 16 or 17 year olds – access to authoritative data is the only way to deliver a system that is both accurate and fair.

As the Australian experience illustrates, implementation will inevitably be iterative. Not every underage user disappears from platforms immediately, but steady progress is made as platforms strengthen their checks and as the supporting technical ecosystem evolves.

We would be pleased to assist the Committee further should it require any additional technical information on how these systems operate in practice.

Yours sincerely,

Iain M Corby

Executive Director