Age Check
Certification Scheme

Technical Requirements for Age Check Systems

ACCS 4: 2020

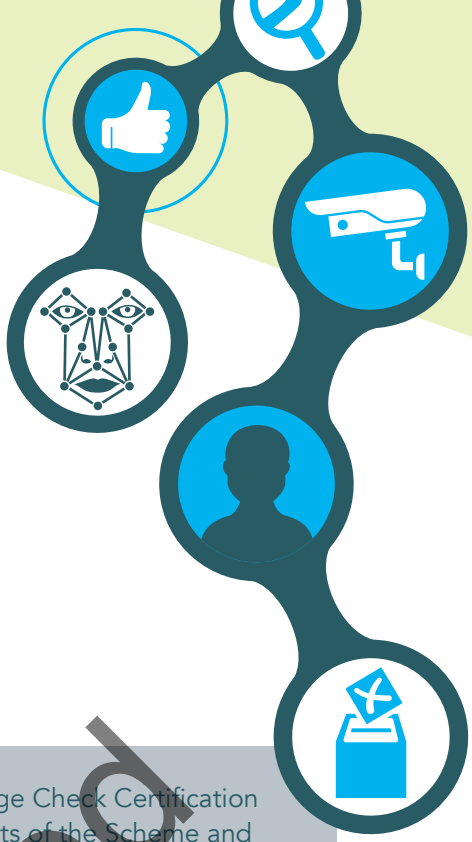
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UKAS PRODUCT CERTIFICATION
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For the assessment of claims of conformity under PAS 1296:2018 Online age checking. Provision and use of online age check services. Code of Practice

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Introduction

Age Check Systems are utilised by providers of age restricted goods, content or services to assess and make decisions about the age of customers. This can be through age determination (often called 'hard verification'), age categorisation or age estimation.

PAS 1296:2018 provides a code of practice for age check providers, age exchanges or relying parties undertaking age check processes. As a code of practice, it does not set requirements, but does provide for organisations to make claims of conformity including through independent 3rd party validation of age check systems. In order to do that, it is necessary for the conformity assessment body to set out the technical requirements that it will apply, using PAS 1296:2018 as a framework, to assess whether or not to issue a certificate of conformity.

The Scheme aims to achieve the following:

- to validate and certify tools to help prevent harm to children and nuisance caused by young people from access to age restricted content, goods and services
- to improve the quality, consistency and performance of age verification systems and procedures both online and offline
- to provide consumers, purchasers, specifiers, regulators, law enforcement authorities, content providers, service providers and goods retailers with the assurance for them to identify suitable companies for conducting age verification
- to help companies and individuals to demonstrate that their services or products meet an appropriate standard
- to enable companies to demonstrate compliance with GDPR of processing operations by controllers and processors
- to mitigate the risks of non-compliance with age restricted content, goods or services legislation including mitigating the risks of:
    - o criminal or disciplinary sanctions
    - o civil or criminal action against the business and individual staff
    - o damage to reputation leading to a loss of business
    - o licensing action, conditions or restrictions imposed by Licensing Authorities

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Scope

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1. Scope

The Age Check Certification Scheme (ACCS) Standards are applicable to Scheme Clients submitting age check systems for certification from ACCS and wish to have access to use of the ACCS certification mark as a mark of conformity for the technology.

This part of the ACCS Standards:

- establishes the definitions applicable to age check systems testing
- identifies the target of evaluation for age check systems testing
- establishes the requirements for age check systems to demonstrate conformity and be fit for deployment

The suite of ACCS Standards are applied as applicable to the activities of clients certified by ACCS. This will be dependent on the scope of operations of the providers and the services that they provide.

These technical requirements are applicable to:

- Age Check Providers that verify age attributes on request by a third party on a transaction-by-transaction basis under a pre-arranged contractual relationship with the Age Check Provider
- Age Check Exchange Providers or Brokers that provide an online gateway for Age Check Providers and Relying Parties to access user asserted, permissioned and verified attributes
- Relying Parties (online or offline) that rely on results of an age check (either remotely or during a face-to-face encounter) to establish the age-related eligibility of an individual for the purposes of a transaction (such as sellers or providers of age restricted goods and services)

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Age Check Providers will provide at least one of the following services:

- **age determination:** an indication established that a citizen has a particular age stated to a specified level of confidence and by reference to information related to that citizen
- **age categorisation:** an indication established that a citizen is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that citizen
- **age estimation:** an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen (The Technical Requirements for Age Estimation Technologies are set out in ACCS 1)



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Normative Refernces

Normative References

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2. Normative References

Legal Provisions

National and International Standards

PAS 1296:2018 - Online age checking

Provision and use of online age check services. Code of Practice

Other Documents

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Terms and Definitions

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3. Terms and Definitions

In this document:

"shall" indicates a requirement

"should" indicates a recommendation

"may" indicates a permission

"can" indicates a possibility or a capability

GUIDANCE NOTES are shown in italic text and are intended to assist the reader with understanding provisions.

When referring to the ACCS Standards, refer to the ACCS Standard, followed by the year of issue, followed by the provision – such as **ACCS 0:2021, 4.3.**

3.1 Age Appropriate Design Code (AADC)	means the Code of Practice laid before Parliament and issued under s.123 of the Data Protection Act 2018.
3.2 Age Categorisation	means an indication established that a citizen is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that citizen.
3.3 Age Check Exchange	means an online internet gateway for age check providers and relying parties to assess user asserted, permissioned and verified attributes [PAS 1296:2018 – 2.1.2].
3.4 Age Check Practice Statement	means the document describing the operational practices and procedures of an age check service [PAS 1296:2018 – 2.1.1].
3.5 Age Check Provider	means an organisation responsible for all the processes with establishing and maintaining a subject's identity attributes [PAS 1296:2018 – 2.1.2].
3.6 Age Check Service	means the entity that makes available attributes for the purposes of age checking [PAS 1296:2018 – 2.1.5].
3.7 Age Determination	means an indication established that a citizen has a particular age stated to a specified level of confidence and by reference to information related to that citizen [PAS 1296:2018 – 2.1.4].
3.8 Age Estimation	means an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen.

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3.9 Age Verification Process	means the inter-related or interacting activities that transform a series of attributes into an age verification product [ISO 17065:2012 – 3.5].
3.10 Age Verification Product	means the result of an age verification process [ISO 17065:2012 – 3.4].
3.11 Certification Requirement	means a specified requirement that is fulfilled by the client as a condition of establishing and maintaining certification [ISO 17065:2012 – 3.7].
3.12 Certification Scheme	means the Age Check Certification Scheme [ISO 17065:2012 – 3.9].
3.13 Client	means an organisation that has applied for certification or been granted certification that is responsible to ACCS for ensuring that the certification requirements are fulfilled [ISO 17065:2012 – 3.1].

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4. Target of Evaluation

Scope of the Age Estimation Technology under Evaluation

4.1 The scope of the age check system under evaluation shall be defined and recorded on the certification agreement.

4.2 The scope shall include:

a) the name given to the age check system by the client

b) the operating parameters of the age check system including:

a. any process limitations

b. any prerequisites for operation

c. any tethering required (such as connectivity) for operation

d. any technological requirements

e. any performance throttling applied to the output of the technology (such as disregarding results through uncertainty assessments)

c) the version or deployment reference of the target of evaluation.

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Technical Requirments

Technical Requirements

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5 Technical Requirements

Age Check Services

5.1 Age check services verify age attributes on request by a third party on a transaction-by-transaction basis under a pre-arranged contractual relationship with the age check provider.

5.2 Age check services shall produce an assessment of the extent to which it meets the age check principles relating to:

a) transparency

b) consent

c) blindness

d) enduring permission

e) commercial model

f) attribute metrics

g) data minimisaton

[PAS 1296:2018 4.5.2]

5.3 Age check services shall categorise its authoritativeness and conformity assessment as a source of age-related data by reference to its clientship of ACCS. This is as independent third-party certification by an accredited certification body or as other-party validation by a certification body belonging to a particular community of interest.

[PAS 1296:2018 4.2.2 & 4.3.1.2.1]

5.4 The age check service shall record any additional standards to which it claims conformity and the basis of the claim.

[PAS 1296:2018 4.3.1.2.2]

5.5 The age check service shall provide an age check practice statement containing the minimum list of attributes that can be provided by the age check service.

[PAS 1296:2018 4.3.2.1.2]

5.6 The age check service shall record the system used for assessing and scoring the age check practice statement in order to establish the conformity assessment category. This shall include a record of:

a) scoring or assessment and scoring system used

b) how assessment and scoring was performed

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c) management of the assessment information (whether governed or shared)

5.7 The age check service shall categorise the vectors of trust score that can be placed in the yes/no response to an age check.

5.8 The age check service shall provide metadata for each attribute it provides in the categories of:

a) attribute derivation

b) chain of custody

c) access control

d) consent

e) description

f) last update date

g) source

Requirements for Age Exchange Service Providers

5.9 Age check exchanges provide an online gateway for age check providers and relying parties to access user asserted, permissioned and verified attributes.

5.10 Age check exchanges shall produce an assessment of the extent to which it meets the criteria for assessing the exchange relating to:

a) integrity

b) dynamic age check exchange

c) categorising relying parties

d) commercial model

e) attribute metrics

f) multiplicity

[PAS 1296:2018 8.4.1]

5.11 Age check exchanges shall have an auditable trust framework for all parties involved in the exchange either as age check services or as relying parties in accordance with the Scheme Rules.

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Requirements for Online Relying Parties

5.12 An online relying party relies on results of an age check to establish the age related eligibility of an individual for the purposes of a transaction or entry to a domain with age restricted content.

5.13 The relying party shall include within their age checking policy:

a) the advance warnings to be displayed to users indicating their approach to accessing age restricted content, goods or services to create an expectation that an age check will occur

b) the nature and characteristics of the relying party's users

c) how the relying party determines the standards to which it requires any age check services it uses to conform

d) whether the relying party's service is intended for children or others who need responsible third parties involved in their day-to-day decisions and in such cases, whether parental or responsible third party involvement is needed

e) whether the relying party can build its own in-house age check service (in which case the requirements for age check services would apply)

5.14 The relying party shall obtain and hold a copy of:

a) the Age Check Certification Scheme Certificate of Conformity of the age check services or age check exchange used (if applicable)

b) the data protection policy and data protection impact assessment (redacted for any commercial details) of the age check services used

c) the authoritativeness category of the age check services used – note that relying parties are not permitted to use an age check service with no evidence of authoritativeness or where self-validated, the ACCS is satisfied that appropriate assessment of the authoritativeness of the age check service has been undertaken by the relying party)

d) the age check practice statement for the age check services used

e) the age check service's assessment of the extent to which it meets the age check principles

f) if using an age check exchange, an assessment of the extent to which the age check exchange meets the criteria set out in PAS 1296:2018

5.15 The relying party shall hold a record of the vectors of trust score that can be placed in the yes/no response to an age check for any age check services it uses. The relying party is not

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permitted to rely upon an age check with a low vector of trust that contains attributes for:

a) identity Proofing **P0** or **P1**

b) primary Credential Usage **C0** or **Ca**

c) primary Credential Management **Ma**

d) assertion Permission **Aa**

5.16 The relying party shall check that the contract or trust framework stipulates the auditing requirements for any age check services it uses.

5.17 The relying party shall request the metadata for each attribute the age check service provide in the categories of:

a) attribute derivation

b) chain of custody

c) access control

d) consent

e) description

f) last update date

g) source

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5.18 The terms relating to the provision of metadata shall be included in the service level agreement with the age check provider and be available on request for each transaction or age check decision.

5.19 The relying party is not permitted to:

a) rely solely on the user to confirm their age with no cross-checking of information, for example by using a 'tick box' system or requiring the user to only input their date of birth

b) use a general disclaimer such as 'anyone using this website will be deemed to be over 18'

c) accept age verification through the use of online payment methods which may not require the user to be over 18

d) check against publicly available information or otherwise easily known information such as name, address and date of birth

5.20 The relying party shall implement measures that are effective at preventing access to age restricted content, goods or services by non-human operators including algorithms.

Requirements for Offline Relying Parties

5.21 An offline relying party relies on results of an age check carried out by a member of staff to establish the age-related eligibility of an individual for the purposes of a transaction for the purchase of age restricted content, goods or service or entry to an age restricted area or premises.

5.22 An offline relying party shall include in their age checking policy (as required by Section 5.2):

a) the advance warnings to be displayed to customers, their positioning and prominence, to create an expectation that an age check will occur; this shall include for the provision of any signage required by law

b) the policy to be adopted with regard to the age at which customers will be challenged for age verification

c) the nature and characteristics of the relying party's customers and service users

d) the nature and types of identification that it will accept as Proof-of-Age which shall, as a minimum, include a Proof-of-Age Standards Scheme approved ID card

e) how the relying party determines the standards to which it requires any age checking to be undertaken by staff

f) the training policy for clients of staff responsible for age checking

g) whether the relying party's service is intended for children or others who need responsible third parties involved in their day-to-day decisions and in such cases, whether parental or responsible third-party involvement is needed

h) whether the relying party is implementing automated age checking procedures

i) whether the relying party can build its own in-house age check service (in which case the requirements for age check service would apply)

5.23 An offline relying party that implements an automated age-checking procedure (such as an electronic ID application, biometrics or other technical measures) shall comply with the provisions for an online relying party set out in Section 5.12 - 5.20.

5.24 The relying party is not permitted to adopt a policy that:

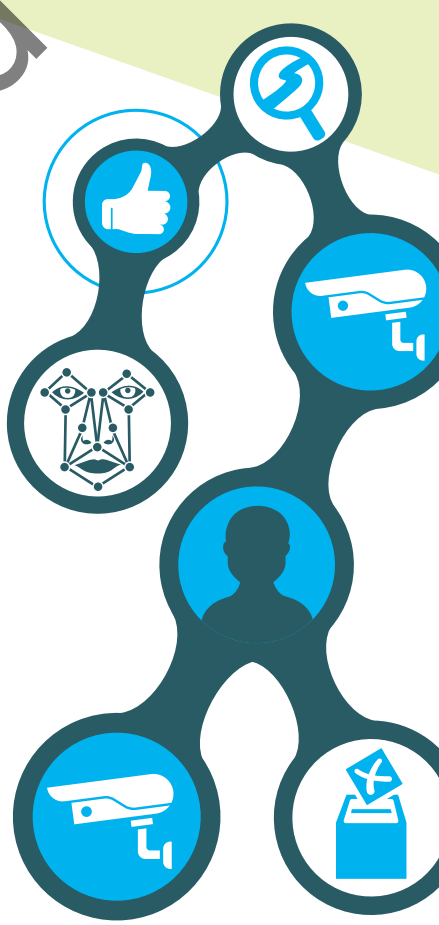
a) seeks to identify the certification scheme or law enforcement test purchasers

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b) uses a general disclaimer such as 'anyone entering these premises or buying these goods is deemed to be over 18'

c) requires staff to ask the age, but not to verify the age, during a transaction

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Internationally recognised standards

Our scheme provides evidence that identity and age check practices meet international standards.



Highly qualified certification officers

Our locally trained certification officers are highly qualified professionals in each jurisdiction.



Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.



Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

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Age Check Certification Scheme

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