Coming to Terms with Age Assurance

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About FOSI

The Family Online Safety Institute (FOSI) is an international nonprofit organization working to make the online world safer for kids and their families. As a leading convener in the field, FOSI is a trusted source across stakeholder lines, and a nonpartisan name trusted by policymakers across a wide spectrum of viewpoints, as well as by industry leaders, researchers, educators, and others in the nonprofit sector.

FOSI works with a global stakeholder community around the world to bring a unique perspective to the potential risks, harms, and rewards of digital life. With a wide membership base of 20+ leading technology and telecommunications companies, FOSI’s work encompasses enlightened approaches to public policy, the cultivation of industry best practice, and support for parents and families.

About This Working Group

First assembled in April 2022, this working group operated cooperatively over the course of one year to explore different perspectives from across competitive lines on the pressing need to address age assurance as a top safety concern, particularly for young people. This process was initiated by an audit of existing approaches to age assurance by working group members’ own platforms and services, with discussion about the policies and technologies that were most beneficial.

Additional interviews with experts outside of the working group were conducted in the final months to better inform and ensure a balanced, neutral representation of the challenges and opportunities of different approaches, particularly in response to increased regulatory pressure and reports of the potential for harm to young users who may access platforms underage.

This process benefited greatly from the body of existing work that has been established by many organizations leading the way globally on age assurance. The aim of this paper was to distill this knowledge, along with FOSI’s own research, reports developed by government and academic bodies, and takeaways from the working group itself, into a resource that may serve as a reference point for those building strategies to more fully realize the potential of age assurance.

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Introduction

As concerns about online safety proliferate, one proposed approach for keeping children safer online is the deployment of age assurance tools capable of estimating or verifying the ages of users. Assessing a person’s age online is complicated, particularly when it comes to children and minors. This issue has perplexed the creators of websites, platforms, apps, and games since the early days of the Internet.

Over 20 years ago, a U.S. Congressional commission concluded that there was no silver bullet, and that the technology needed was not yet in place to do a satisfactory job. While technology has evolved since then, so too have the obstacles and nuance around protecting underage users online.

There is more to be considered than just the capability to assess or verify age at a technical level. Age assurance comes with a particular, fundamental trade-off: the more personal information collected from users, even in the name of safety, the greater the impact on their privacy. Social media age gates were initially established to enforce platform terms of service limiting kids under 13 from having an account. This may also create an incentive for kids (sometimes with their parents’ agreement) to enter a false date of birth and bypass age restrictions. Not only does this put kids at risk, it prevents them from benefiting from the many age-appropriate features specifically created to keep younger users safer and their data private.

To make progress, it is important to reflect on the current state of age assurance and the complexities that have gridlocked developing technologies or approaches that can be widely implemented. This means finding a combination of public policy, technologies, and educational efforts to create a safe and effective, but fundamentally privacy-focused set of solutions. Recent research examining the attitudes of parents and young people finds that users’ opinions are nuanced. They have varying perceptions of different age assurance methods. These impressions, along with the lessons and best practices learned from leading industry companies, mean that legislators, policymakers, and tech companies are unlikely to establish a “one size fits all” solution that will fit each person’s digital life and values.

Definitions

Age assurance

Age assurance is a broad term that describes various methods to discern the age or age-range of an online user including age verification, age estimation, and age gating. Companies use age verification, which includes “hard identifiers” such as a photo ID or other government issued documents to comply with laws and regulations that require an exact minimum age and a high level of confidence in the age of a user.

Age estimation

Age estimation, by contrast, provides a person’s likely age range as opposed to an exact age through methods such as facial scanning, that leverages artificial intelligence and machine learning technologies. This method has gained popularity in recent years as a convenient and autonomous way to assess age without requiring any connection to a user’s identity.

Age gating

Age gating, which calls for a user to enter or “self-declare” a date of birth to gain access to a website, platform or app, or certain functions within them is the most common method currently used. Age gates provide low levels of confidence in a user’s age because children can easily circumvent them. However, if used in conjunction with other methods, age gating may remain an initial part of a broader process to determine a user’s age.

Source: https://avpassociation.com/definitions/
Executive Summary

As concerns about online safety proliferate, one proposed approach for keeping children safer online is the deployment of age assurance tools capable of estimating or verifying the ages of users.

To make progress, it is important to reflect on the current state of age assurance and the complexities that have gridlocked developing technologies or approaches that can be widely implemented. This means finding a combination of public policy, technologies, and educational efforts to create a safe and effective, but fundamentally privacy-focused set of solutions.

While there are substantial obstacles, the opportunities and benefits of getting age assurance right are many. There is significant potential for age assurance methods and processes to make a valuable impact, but certain factors must be addressed for that potential to be realized. This is a venture worth pursuing in order to achieve a safer and more child-friendly Internet.

Challenges

Proportionality
- Proportionality refers to the use of a risk-based scale to determine which age assurance methods will best minimize online harms to kids.
- Establishing a risk-based and proportional approach to age assurance is one of the most consistent and important ideas that has coalesced from research, expert interviews, and best practices.
- The challenge in developing policies around this approach is particularly difficult due to lack of consensus on what the risk levels are for different types of online experiences, and for different ages of kids.
- It’s important to thoughtfully develop a regulatory roadmap that will steadily and reliably reduce harm and uncertainty, rather than mandate a rushed approach.

Variety of services
- The tech industry is composed of thousands of companies that offer a variety of services. The challenge of determining a user’s age so they can safely access, create, and communicate using those services varies according to the context.
- There is considerable complexity to the process that must happen internally within companies before the public is ever asked for their age. Policy, privacy, and product teams must align in a way that will make age assurance goals possible.

Safety vs. privacy
- A key tension within age assurance is finding a balance between safety and privacy.
- When it comes to age assurance, the more effective a method of verification is, the more data is required. It is not possible to fully verify a person’s age without collecting any personal data.
- The variety of methods currently available range from those requiring hard identifiers (such as government issued IDs), to the use of AI and machine learning technologies that can assess an age range. No singular method addresses every concern, and each must be considered individually.

Transparency
- A critical factor in the acceptance of any approach to age assurance will be consumer buy-in.
- Industry will need to convince users that they will only use an individual’s identifying information for age estimation purposes and that they will dispose of such information or retain it securely.

Opportunities

Increased safety
- Determining the age of a user allows platforms to design products and services that allow people to experience the many benefits of being online. This means striking the right level of data protection, ad targeting, illegal or harmful content filtering, and product features to maximize safety.

Peace of mind
- Providing peace of mind to policymakers, industry, and families is an additional opportunity.
- While it is unlikely that there is a single policy or technological solution that would satisfy every policymaker, establishing effective minimum age assurance standards on a global scale would go a long way towards addressing their legitimate concerns and building trust.
- Reminding caregivers of the positive experiences children and teens can have online is vital. This is best achieved not through inflammatory public debate but through demonstrably improved safety measures, including robust age assurance application.
- It is important for parents to let kids fully experience the benefits of online spaces, rather than just seek to restrict access for fear of unintended harm.
For Policymakers

- A thoughtful and measured approach to policy must consider people’s rights to free speech and privacy.
- A comprehensive federal data privacy law would lower the stakes of age assurance. The inclusion of data minimization principles, use limitations, and storage requirements would be an important precursor to age assurance regulations.
- It is important not to disincentivize content creators from building positive online experiences for kids due to burdensome regulatory requirements.
- Establishing national and international soft law standards would go a long way toward effective age assurance practices that are both consistent and effective, and would improve online safety for all users.

For Industry

- It is important for industry to consider user experience and minimize potential points of friction. Interoperable solutions could alleviate issues of user frustration, making it easier for businesses to streamline efforts.
- Presenting users with choices of age assurance processes is ideal, as is building trust between users and companies, and considering the balance of how effective a method is versus how invasive.
- It is vital that digital experiences designed for kids are just as appealing and enriching as those for adults.
- Within companies, product, legal, and marketing teams must come together to build, leverage, and promote the positive results of these efforts.
- Innovating and designing experiences for kids will both keep them safer and decrease the motivation for them to seek out adult versions of services.

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Challenges

There is broad consensus that developing policies and technologies that can support online safety, especially for children, is critical. But there are key questions to consider before imposing broad age mandates on companies and asking people to comply with them. These challenges fall into five broad categories: (i) proportionality and risk, (ii) variety of businesses and services, (iii) balancing safety and privacy, and (iv) transparency.

Proportionality and Risk

The concept of proportionality refers to using risk-based systems to prevent online harms to kids through age assurance methods based on a scale risk. For example, age gating a pornography site by requiring a "hard identifier" such as a government ID may be considered more acceptable in context because of the risk of kids accessing the content. By contrast, to require an equally strict method of age verification for a child to access a kid’s game could be seen as draconian because the content would be of much lower risk.

The challenge in developing policies around age assurance is particularly difficult due to the lack of consensus on what the risk levels are for different types of online experiences at different ages. Moreover, applying age assurance policies to platforms and services that are created for kids, versus those that are likely to be accessed by kids, should be considered differently. The latter presents a potentially higher level of risk in that the experiences will not have been created with children in mind.

Additionally, providers of age assurance solutions may struggle to create a universal framework that can be widely implemented, and regulators may have a different view on the framework and how it is enforced. Attempting to regulate "harmful" content could also raise First Amendment concerns in the United States. This has the potential for unintended consequences if legislation moves forward too quickly. For this reason, it is important to thoughtfully develop a regulatory roadmap that will steadily and reliably reduce harm and uncertainty, rather than mandate a rushed approach.

Contending with a variety of services

The tech industry, while often referred to as one entity, is composed of thousands of companies that offer a variety of services. The challenge of determining a user’s age so they can safely access, create, and communicate using those services varies according to the context.

There is a perception that people misrepresenting their age is perhaps the biggest hurdle to implementing age assurance, but there is also considerable complexity to the process that must happen internally within companies before the public is ever asked for their age. The effort required to align policy, privacy, and product teams in a way that will make age assurance goals possible is extensive. Companies of the largest size and highest level of resourcing have struggled to achieve it, which means it will be even more difficult to implement for startups and smaller organizations - which may have great ideas, but lack the capital and human resources to keep up. This struggle puts innovation at risk, a substantial concern in kids’ spaces.

Safety vs. privacy

A key tension within age assurance is finding a balance between safety and privacy. Adhering to laws and standards that require data minimization and limit the collection of information from and about users (especially young users) is standard practice in the tech industry. By not collecting unnecessary data, people are better protected from tracking, targeted advertising, and hacking and other data abuses.

However, when it comes to age assurance, the more effective a method of verification is, the more data is required. It is not possible to fully verify a person’s age without collecting any data. This presents the following challenges:

- Determining the methods of verification that are most acceptable to consumers.
- Determining what information is required to implement those methods.
- Communicating their approach to users, and educating them on why providing this data is in their best interest.
- Prioritizing transparency and sharing who may access or use user data (i.e., any third party vendors).
- Adhering to existing (and future) laws when implementing any approach.

Assessment methods that do not require a hard identifier, such as age estimation, combine methods such as facial scanning, video technology, and potentially voice capture with AI and machine learning to assess age as a range. This makes it possible to determine, for example, that a user is over 18 or under 13, even if the user’s exact age is not determined.
Methods like these alleviate some of the privacy burden that comes with requiring additional personal data such as government identifiers or financial information to prove age. However, for users with heightened privacy concerns, it will be imperative for companies that adopt such methods to clearly communicate how age estimation technology works and distinguish it from facial recognition and other biometric technologies that can be used to authenticate a user’s identity.

**Creating a culture of transparency**

A critical factor in the acceptance of any approach to age assurance will be consumer buy-in. Industry will need to convince users that they will only use an individual’s identifying information for age estimation purposes and that they will dispose of such information or retain it securely. Moreover, industry can make the case that there are benefits to age estimation, such as built in safety and privacy protections for younger users.

Although young people are often considered to be the ones most likely to circumvent age barriers, recent FOSI research shows that many parents are also willing to allow or even assist their kids in bypassing age restrictions, e.g., by allowing or aiding their children in circumventing age gates that require only a user’s self-declared date of birth. This happens for numerous reasons. Some parents feel confident that they can personally oversee their child’s activity, although this confidence may waiver as kids get older, at which point it will be hard to reverse course or revoke access. Others report that they require a conversation with their child about how to stay safe, but ultimately make a decision to allow access based on their own determination that the child is responsible and mature enough.

It may not be realistic to expect the average, busy parent to understand every technical element of data collection. It is, however, in the tech industry’s best interest to ensure that they are supporting their users by clearly and concisely providing information as to:

- What identifying information is required.
- How and why it will be used.
- How it will be kept safe and how long it will be stored.
- How it will NOT be used or shared.

Equally important is the perception of the age assurance process. According to the same study, both parents and kids view age assurance more as a restrictive process than a beneficial one. Both parents and businesses alike often interpret age assurance requirements as something they must do to keep negative interactions or influences away from children. Although this may be true to a certain extent, it is not the only purpose of creating age-gated spaces.

Offering safe, age-appropriate experiences can provide children with tailored educational and entertainment opportunities that might not exist on services geared toward adults. Being transparent about company practices and educating users to the benefits of participating gives them the opportunity to acknowledge that age assurance is not about trying to keep kids from accessing the digital world but ensuring their safety while online.
Opportunities

As daunting as the obstacles may be, the opportunities and benefits of getting age assurance right - the harmonized implementation of an effective age assurance system across websites, apps, and devices - are many. This venture is worth pursuing in order to achieve a safer and more child-friendly Internet.

Increase safety (and decrease exposure to harm)

One of the most significant ways age assurance increases online safety is by decreasing exposure to harm. It is a delicate compromise between giving young people control over their own online experiences and ensuring proper safeguards. Determining the age of a user allows platforms to design products and services that allow people to experience the many benefits of being online while striking the right level of data protection, ad targeting, illegal or harmful content filtering, and product features to maximize safety.

Done well, this would result in the youngest users being kept safe and the older users not feeling sequestered to a “kids only” online experience. Age assurance systems have the potential to ensure that young children are not exposed to harmful content or inappropriate advertising, nor put at risk from inappropriate features for children, such as scams, the collection of personal data, or private communication with strangers.

Peace of mind for policymakers, industry, and families

Providing peace of mind to policymakers, industry, and families is an additional opportunity. Politicians around the world have criticized technology companies, platforms, and products. Some have engaged in sensationalized language to call attention to safety issues, although this is sometimes done without acknowledging the full scope and nuance of the issue. Others have introduced thoughtful legislation to improve online safety for young users, in a way that proposes evidence-based solutions. While it is unlikely that there is a single policy or technological solution that would satisfy every policymaker, establishing effective minimum age assurance standards on a global scale would go a long way towards addressing their legitimate concerns and building trust.

Likewise, parents and caregivers have been alarmed by news stories about the harms young people have suffered online. Installing protective measures and safeguards across platforms, devices, and services that prioritize the physical and emotional safety of minors can reaffirm to families that industry is listening and working hard to improve safety. Reminding caregivers of the positive experiences children and teens can have online is vital. This is best achieved not through inflammatory public debate but through demonstrably improved safety measures, including robust age assurance application.

Industry is concerned about the public’s skepticism and lack of trust in companies. Adopting successful age assurance systems would help to solidify trust in these platforms, and demonstrate their commitment to prioritizing safety, especially for their younger users. By addressing the valid online safety concerns that young people face through the implementation of effective age assurance requirements, policymakers, families, and industry should be able to rebuild trust, reduce negative rhetoric, and create a sense of confidence.

Create a new safety-by-design baseline

The widespread adoption of age assurance best practices can create a new safety-by-design baseline that protects everyone online. Effective assessment methods could become a new minimum standard that online services meet or exceed in order to keep young users safe. One example of this is the UK’s AADC, which went into effect in September 2021, an enforceable code that requires platforms to meet fifteen standards. Chief among them is the precondition to design products and experiences with the best interest of a child in mind.

If age assurance is built into the system by default, this new safety baseline will in turn increase trust between families, industry, and policymakers. Success in this endeavor will require input and participation from all stakeholders. This means reasonable regulations set by policymakers, and collaborative industry innovation that prioritizes the wellbeing of users in a way that is proactive and anticipates challenges. It is critical that families understand age assurance processes and the implication of providing their data.
What policymakers can do

There is optimism about the future of age assurance among experts from many backgrounds – industry, NGOs, researchers, and regulators. Improving age assurance systems has the potential to significantly increase online safety for all users. It is an achievable goal that everyone can unite behind, and will take a combination of innovative technology, transparent and trustworthy practices, and thoughtful regulation that sets a floor for industry to meet and exceed.

Past, Present, and Future

Regulatory efforts have improved over many years of online child safety policy. COPPA, passed in 1998, requires businesses covered by the law to obtain verifiable parental consent (VPC) before collecting, using, and disclosing data from children under 13. COPPA does not mandate the method a company must use to get VPC from a parent or guardian; however, the Federal Trade Commission has approved seven consent methods under the COPPA Rule. Some of these methods have proved inconvenient or even inaccessible (e.g., credit card verification or government document verification) for some families. Stakeholders from industry, consumer groups, and the privacy community have advocated for new VPC methods.

Although some of the COPPA VPC methods could conceivably be adapted for age assurance, it is important to emphasize that COPPA is not an age verification policy. The statute does not require age verification of child users; instead, it requires VPC from parents or guardians. Policymakers, industry, and other stakeholders, therefore, need to learn from and look beyond COPPA to develop a new era of age assurance policy.

States are already acting, but without the necessary specificity or guidance for industry. Utah and Arkansas have both passed laws that require parental permission for everyone under 18 to create a social media account. As part of this requirement, online platforms must verify the age of all users to restrict or remove those who are under 18 and without parental consent. The guidance on this is either lacking or requires hard identifiers like a government issued photo ID. This brings in a range of issues including equity and privacy concerns.

Current proposals like the Kids Online Safety Act and the UK’s AADC focus on a new standard, sites and services “likely to be accessed by children.” That is a huge change and will include a much higher percentage of online platforms. There is (and must be) an age assurance component within many of these bills, as a part of trying to figure out what services are likely to be accessed by a child.

Progress should be made through the establishment of international standards

During the past few years, drastically different regulatory approaches around the world and even within countries such as the United States - have put industry in an unenviable compliance situation. Whether it be for privacy and data protection, age-appropriate design codes, and now age assurance, different jurisdictions are passing divergent and sometimes conflicting laws. Industry faces the choice of complying with a patchwork of laws and standards or simply complying with the “strictest” laws. The jurisdiction with the “strictest” laws could therefore become the default baseline. Establishing national and international soft law standards would go a long way toward effective age assurance practices that are both consistent and effective, which would in turn improve online safety for all users.

Additionally, a comprehensive federal data privacy law would lower the stakes of age assurance. If there were already limits on what data companies could collect, how it must be stored, and how it could be used, then users, regulators, and platforms themselves would be more confident in giving and using the information required for age assurance. Including data minimization principles, use limitations, and storage requirements would be an important precursor to age assurance regulations. The US lags behind countries around the world and now ten states have passed their own privacy laws. Among other benefits, a national privacy law would enable effective and trustworthy age assurance.
Despite recent regulatory attention in this space, age assurance is important to more than just social media. Every online ecosystem can benefit from having some type of age assurance. This includes e-commerce and online marketplaces, gaming, streaming, news, and other platforms that could offer safer and more age appropriate online experiences.

Having interoperability within and between sectors is difficult, but an essential part of improving age assurance systems globally. Instead of persistent identifiers that are used in the context of behavioral advertising, there could be potential for the development of persistent age identifiers that allow users to navigate from site to site and app to app, offering opportunities for re-assessment at certain time intervals or when a user pursues sites or services deemed to be higher risk.

This is an idea that should be studied and considered by policymakers, in cooperation with industry, to determine its feasibility. Having a pop up window on every website that requires users to repeatedly verify their age would be a non-starter for most users, and an outcome that policymakers should avoid.

If industry can show progress on agreeing to and working towards reasonable standards and best practices, in a truly collaborative way, an additional benefit would be to delay flawed, unreasonable, and reactionary legislation. Industry best practices will not solve every problem as there are limits to self-regulation, but if industry can show cooperation and progress, that could help regulators see what an appropriate floor or minimum standard looks like, thereby improving relevant regulation.

There is an opportunity here for policymakers to help build trust across the ecosystem. People will be more likely to trust age assurance systems if they live in a country that has set a minimum standard in law for all online platforms to meet. A minimum floor would provide certainty for industry to know what to meet, but those that wanted to prove their commitment to online safety could innovate and build even higher levels of safety into their products and platforms, further increasing users’ trust that their online experiences will be safe and age appropriate.

**Adhering to a risk-based and proportional approach**

Establishing a risk-based and proportional approach to age assurance is one of the most consistent and important ideas that has coalesced from research, expert interviews, and best practices. As described above in the Challenges section, this means that age assurance processes should feature proportionally appropriate levels of assurance corresponding to the level or risk and harm that the user may experience. Proportionality could also include some combination of these processes in order to effectively and realistically provide options to users.

Other important considerations for policymakers to consider are that regulations should be technologically neutral and company agnostic. It is important to have regulations that are capable of aging and do not become immediately obsolete with the development of new technology. The government should also avoid picking winners and losers by not endorsing one company or one type of provider to do all age assurance for all users on all sites and services.

It is also worth considering the benefits of using independent third party companies or the major platforms themselves, and potentially including audits or transparency requirements. Ultimately, presenting users with choices of age assurance processes is important, as is building trust between users and companies, and considering the balance of effectiveness and invasiveness.
Considerations for industry

Thoughtful implementation and user experience

It is important for industry to consider user experience and strive to minimize potential points of friction. Concerns have been raised around the potential for age assurance processes to become the next “cookie banner,” prompting users to undergo age checks each time they visit a new website or app. Interoperable solutions could alleviate issues of user frustration and fatigue, and make it easier for businesses to streamline their efforts.

This concept would also support emphasizing a risk-based approach, wherein once a user has verified their age, they would only need to re-verify for sites deemed to be higher risk, such as those with adult content, gambling, or access to purchasing alcohol.

Transparency and appeals processes

According to FOSI’s most recent research, parents slightly preferred an account level age assurance checkpoint (e.g. App Store or Google Play Store). Checking user age for each individual download from an app store was considered too restrictive and tedious. Placing a checkpoint at the device level was viewed as not rigorous enough, leaving more room for circumvention and confusion as children of different ages often share devices within a single home.

Verifying user age at an app store level is not a simple solution, but examining user preference can help to shape ideas for industry about the points at which people would be most comfortable participating in age assurance. It is important to note that users can only provide consent or agree to a process to the extent that they understand it. This underscores the need at any checkpoint to explain what is being verified, for what purpose, and any terms or conditions applicable to providing the required information.

It is important for industry to also include a transparent appeals process for users. If a user account is flagged as being underage, or placed in an incorrect age bracket (i.e. the age assurance process makes an error), there must be a clear way for users to appeal and the company or service to correct the mistake.

Prioritize need for quality children’s content

To encourage users to comply with age assurance, it is vital that digital products and services designed for kids are just as appealing, entertaining, and enriching as content for adults. Not only will staying within the spaces designed for them keep kids safer, a positive experience will hopefully decrease or delay the motivation to seek out versions of apps or websites that seem to have more exciting features and capabilities.

If engineers and content creators are stifled or unable to create quality content, it only perpetuates many of the existing challenges around keeping kids in age-appropriate online environments. Product, legal, and marketing teams must come together to build, leverage, and promote the positive results of these efforts.

Digital products and services designed for kids should be as appealing, entertaining, and enriching as content for adults.
Conversations with experts across the online safety spectrum consistently acknowledge the depth and multifaceted nature of age assurance. Although there are various opinions about possible solutions, there is also agreement that this is an issue in flux, without a simple or singular answer. Regulatory pressure, increased parental concern, and research around the overall impact that technology may have on young people have underscored the need to continue tackling age assurance in a robust and proactive manner. As digital life continues to evolve, protecting our youngest users will remain a top priority and a continuous challenge.

Importantly, there is also optimism across stakeholder lines about the positive progress and momentum in this area over the past several years, and the possibilities for the future. For those who are passionate about protecting children online, whether from an industry, government, private, or nonprofit perspective, the benefit of working through the layered challenges of age assurance is that it means achieving a safer and more enriching online world for kids. The goal of this effort is to maximize benefits and let them fully experience the creative and educational assets of those spaces, rather than seek to restrict access for fear of bad actors or unintended harm.

Lastly, we must acknowledge that parents and caregivers are an important part of growing up online even if the age assurance process is not directly or technically linked to their consent. For many children, the adults in their lives are the first source of reference for how to use technology in a positive way. Through consumer education and transparency, parents will be encouraged to adopt age assurance as an intrinsic part of being safe online. Ideally this will be something they model and pass on to their children, from when they first get online to when they go on to thrive independently in digital spaces.

For those who are passionate about protecting children online, whether from an industry, government, private, or nonprofit perspective, the benefit of working through the layered challenges of age assurance is that it means achieving a safer and more enriching online world for kids.