Expert Panel on Age Restrictions

Update: Proof of Age Standards

Following October's meeting of the Expert Panel, the PASS Board agreed to the formation of a small working group to take forward a new phase of discovery drawn from stakeholder communities with practical insight into the opportunities and challenges of digital proof of age solutions.

Formation of working group

Led by James Lowman, Chief Executive of the Association of Convenience Stores and Chair of the PASS Standards group, the working group currently includes:

Acceptors	Retail community, including the British Retail Consortium and Tesco Betting and Gaming sector
Providers	Young Scot, which is a current accredited PASS provider The Association of Age Verification Providers
Enforcers	Trading Standards North West

In addition, three age verification businesses – namely Yoti, AgeChecked and 1Account – have joined meetings.

Discussions have been collaborative and constructive, albeit not yet conclusive, and all participants in the working group have been generous with their time and determination to co-create an approach that meets some key principles.

- Open and competitive market for accredited digital providers
- Universally accessible to the widest range of acceptors who need to verify proof of age in a physical environment
- Maintains rigour of standards, and drives regulatory compliance

Variation to the initial proposal

The initial PASS proposal put forward in its 2020 consultation relied on the development of a piece of kit (the Retail Verification Interface, either in App or EPOS form), which would then scan the customer's phone to show that they are over 18, or relevant age bracket.

Through the working group process, an alternative has emerged which is, in effect, a change in directional flow of the secure digital hand-shake. The image below is purely illustrative, but indicates that it will be possible to include a number of anti-spoofing features in a future PASS scheme which takes it beyond very early thinking back in 2019 when the QR-led approach was first mooted but rejected.

x5	321xxx025xxxxxxx5xxxxxxxxxxxxx2xxxxxxxxx		
	Account	321	Sainsburys
	Outlet	025	Clapham
	Check code set	5	α β γ δ ε
	Code symbol	2	β

The number above would be further encrypted
Unique codes could be displayed dynamically by EPOS

At this point, both approaches remain under active consideration by PASS, with some independent scrutiny being sourced to test the security of this new variation and to identify any key points of risk.

In addition, more engagement opportunities are being sought over the next few weeks especially with the broader community of acceptors, including the hospitality sector, to ensure that any operational concerns or challenges are baked into the emerging solution.

Ultimately that solution will have two elements behind it: firstly, a functional standard against which digital providers would be audited, and secondly consensus about the operating model and infrastructure which will support a new digital proof of age eco-system where the interoperability between different digital proof of age products within thousands of physical trading outlets is key.

The work is being develop in parallel, and without any rigid interdependencies to the work being led within DCMS to develop a Digital Identity Trust Framework, given the focus of PASS on age verification rather than broader ID attributes.

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