

February 23, 2024

Ofcom Online Safety Team
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

To: IHconsultation@ofcom.org.uk

Re: Response to Consultation: Protecting people from illegal harms online

Bandio appreciates the opportunity to comment on the Office of Communications (Ofcom) request for comments for the Online Safety Act. We support the proposals put forward by Ofcom and share the commitment to better protecting children online.

Bandio is a public benefit corporation that was started by [Common Sense](#) and a leading cryptography and blockchain organization, [Aleo Networks Foundation](#). Bandio was created to provide a privacy-preserving solution to age assurance that is parent and youth friendly. We believe our technology can play a critical role in the future of online safety for children and families.

Privacy-preserving technologies must be contemplated, accommodated, and fostered by regulation. Silence in regulation, on the other hand, will chill adoption -- to the detriment of British consumers and children. More specifically, consumer interests are undermined when individual corporate entities collect personal data and information and then retain such information. This information becomes a "honeypot" target for hackers or can be used by entities for purposes not permissioned by users. Privacy-preserving technologies, like the ones used by Bandio, solve this problem and allow organizations to confirm a user's age without knowing, capturing, or retaining this sensitive information.

Bandio is responding to this RFC because we believe that our approach to age assurance and parental consent offers a set of desirable characteristics, some of which became possible only recently due to technological advancements with zero-knowledge proofs, which is privacy-preserving technology that more companies are beginning to leverage. A few important aspects of our product are:

- Trusted third party - We've partnered with Common Sense Media, a trusted brand by parents and families to develop this product.
- Interoperability - The age estimation or verification process results in an 'age band' that can be used across participating sites and apps
- Privacy-protective - users can provide their age range at participating sites and apps without providing any other personal identifying information, and yet the sites and apps can still verify the validity of the age band
- Ease of use for parents/guardians/families - Parents can create age bands for their kids and younger teens and, where needed for individual platforms, provide consent all in one place
- Limited data use - Personal identifying information is not used for any purpose other than verifying age
- No data retention- No personal identifying information is retained after age estimation or verification
- Distributed networking - No centralized collection of age bands is created, so there is no attractive target for hackers

We accordingly urge Ofcom to craft rules that recognize privacy-preserving technologies, like zero-knowledge proofs and related cryptographic solutions, as preferred solutions for protecting consumers and their privacy. A failure to do so will only perpetuate the status quo, which undermines consumer safety, privacy and trust. Emerging products like Bandio meet all of these characteristics, and provide a feasible and practical solution for companies who need reliable age range information.

We are happy to have follow-up conversations, and discuss more with you about Bandio's solution.



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