



Chartered Trading
Standards Institute

Mrs Sandy Driskell, CTSI Information Officer
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By Email

Child Online Safety Team
4th Floor
DCMS
100 Parliament Street
London SW1A 2BQ

11 April 2016

Dear Sirs

Child Safety Online: Age Verification for Pornography

The Chartered Trading Standards Institute (CTSI) is a professional membership association founded in 1881. It represents trading standards officers and associated personnel working in the UK and also overseas – in the business and consumer sectors as well as in local and central government. The Institute aims to promote and protect the success of a modern vibrant economy and to safeguard the health, safety and wellbeing of citizens by empowering consumers, encouraging honest business, and targeting rogue traders. There is further information about CTSI on the second page of this letter.

CTSI wishes to add the following, further to the dedicated online survey response form that we have already submitted.

We support government action to legislate to ensure comprehensive age verification for access to online pornography. We believe that the planned approach will encourage businesses to work with supply chain providers to enable such verification to be possible and to take place.

However, our experience of online age verification regarding other age restricted products would suggest that many businesses have found it difficult to do and precautions taken have been inadequate to provide protection to young people.

CTSI is involved in the development of online age and identity verification through work with BSI on a PAS standard, and with the Digital Policy Alliance. Our Lead Officer for Age Restricted Sales chairs the BIS-sponsored Expert Panel on Age Restricted Products where this topic has been discussed and best practice guidance produced for retailers to follow.

The Expert Panel consists of industry experts from a regulatory background and national retailers. We would be keen to share our knowledge and work to ensure a common approach.

Furthermore, the government's intended approach offers future opportunities to mandate age verification to other age restricted products such as knives and tobacco.

We would ask that the legislation is drafted to enable other products and regulators to be added at a later date after appropriate consultation. This would enhance protection for minors and reduce the need for additional legislation.

Businesses already find that age restricted products are regulated in a piecemeal fashion which creates training issues for staff and additional complications to compliance.

The CTSI online response to this consultation and this letter were composed by CTSI Joint Lead Officer for Age Restricted Sales Brandon Cook. Please do not hesitate to contact Brandon at loagerestrictedsales@tsi.org.uk should you wish to discuss matters further.

Yours Faithfully

 A handwritten signature in black ink that reads 'Sandy Driskell'.

Sandy Driskell (Mrs)
CTSI Information Officer

About The Chartered Trading Standards Institute

The Chartered Trading Standards Institute (CTSI) is a professional membership association founded in 1881. It represents trading standards officers and associated personnel working in the UK and also overseas – in the business and consumer sectors as well as in local and central government.

The Institute aims to promote and protect the success of a modern vibrant economy and to safeguard the health, safety and wellbeing of citizens by empowering consumers, encouraging honest business, and targeting rogue traders.

We provide information, evidence, and policy advice to support local and national stakeholders.

We have also, as part of our recently revised remit, taken over responsibility for business advice and education concerning trading standards and consumer protection legislation. To this end, we have developed the Business Companion website (www.businesscompanion.info).

The CTSI Consumer Codes Approval Scheme, launched in 2013, has superseded the OFT scheme.

CTSI is a member of the Consumer Protection Partnership, set up by central government to bring about better coordination, intelligence sharing and identification of future consumer issues within the consumer protection arena.

We run events for both the trading standards profession and a growing number of external organisations. We also provide accredited courses on regulations and enforcement.

A key concern for CTSI is that of resources. UK local authority trading standards services enforce over 250 pieces of legislation in a wide variety of areas. They have suffered an average reduction of 40% in their budgets since 2010 and staff numbers have fallen by 50% in the same period.
