

Terry Green Authors GRIP Article on Approaching Deadline for OSA Age Assurance Requirements

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London Deputy Managing Partner Terry Green authored an article for *Global Relay Intelligence & Practice (GRIP)* about the UK Online Safety Act (OSA), now in its implementation phase, and the looming July 25 deadline for any platform that makes adult content available to UK users to deploy "highly effective" age-assurance controls that are technically accurate, robust, reliable and fair. The Office of Communications' (Ofcom) draft guidance rejects self-declaration of age and payment systems that do not confirm users are older than 18 as inadequate, instead pointing providers toward solutions such as email-based cross-referencing, mobile network operator authentication or facial age estimation (where no data is stored). Failure to comply could potentially lead to fines of up to £18 million (\$24.3 million) or 10 percent of global turnover, as well as court-ordered "business disruption measures, such as requiring internet service providers to withdraw services from, or block access to, a provider in the [United Kingdom]."

Though other global jurisdictions such as France, the European Union and several US states have adopted age verification methods, the United Kingdom "leads the way with implementation, scale and enforcement." The article underscores an urgent need for international collaboration and standardized technical benchmarks since variability has led to access being restricted by adult content providers, revealing "the fragile balance between safety, privacy, and enforceability in internet regulation." All platforms must be ready to comply with the OSA by July 25 or risk reputational and financial damage, as Ofcom has shown that it is willing to investigate and act against non-compliant services.

["You must be this tall to click: The Online Safety Act and age-appropriate access," July 23, 2025](#)

**Larry Wong, trainee in our London office, contributed to this article.*

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