[GB] Ofcom clarifies compliant age-gate placement for pornography services under the Online Safety Act

IRIS 2026-2:1/17

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From 25 July 2025, pornography services reachable in the United Kingdom must operate "highly effective" age checks. Ofcom has now clarified how general online safety duties are being operationalised in the UK through specific expectations on product design and presentation. It explains its approach to evaluating compliance where any visibility precedes verification. In short, *where* an age check sits is not cosmetic. If pornographic material is visible *before* the age verification check, the duty may already have been breached.

The statutory basis is the Online Safety Act 2023 (OSA). To support implementation, Ofcom issued age-assurance guidance in January 2025 and an updated package in April 2025. The abovementioned July 2025 milestone marked the point at which services making pornography available to UK users were expected to have effective checks operating. Ofcom records that the ten most-visited sites introduced age checks by the deadline, though operators adopted different placement strategies, which is where the present clarification helps.

To describe market practice, Ofcom identifies four common "age-gate" placements:

a) A "front gate" presents a blank landing page; no content is visible until the user passes the check.

b) A "blur gate" shows thumbnails obscured by blurring before verification; in some variants, titles remain visible, possibly with strong sexual wording.

c) An "image gate" presents clear images, often of clothed persons in suggestive poses, sometimes with hover previews; clicking a thumbnail subsequently triggers verification.

d) An "in-video gate" allows a user to watch part of a video before being stopped and sent to verify, typically up to the point at which nudity would otherwise appear.

The regulatory steer draws on Ofcom’s Protection of Children guidance and the relevant codes. Providers retain flexibility over *methods* of age assurance, but those methods must meet four central criteria. They must be technically accurate,

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robust, reliable, and fair. For dedicated user-generated pornography services, the codes specify that the age check should be at the point of entry. More broadly, Ofcom expects a provider either to gate at entry or to ensure that no harmful content is visible prior to verification.

The reason placement matters is that the OSA defines (under section 236) pornographic content as material that it is reasonable to assume was produced "solely or principally" for the purpose of sexual arousal. Visibility of such material *before* age verification would be inconsistent with the OSA duty. The definition does not turn on nudity. Context and presentation carry weight. Images or clips may be pornographic by purpose, particularly when accompanied by sexually explicit titles or captions. As a result, any model that lets a user see any pornographic material before verification creates compliance risk.

Ofcom accordingly sets out considerations for non-front-gate approaches. A "blur gate" must deploy blurring that is "sufficiently strong" and applied to enough content that what remains visible is not pornographic. An "image gate" requires the provider to ensure that every pre-verification image or preview is non-pornographic, assessed in context and with attention to accompanying language. "In-video gates" are treated as comparatively risky: placing a check part way through a video that, taken as a whole, has the principal purpose of sexual arousal does not necessarily make the pre-gate segment non-pornographic, even if that segment shows no nudity or explicit acts.

Ofcom notes some change across the market practice in the adult sector and the introduction of checks by the largest services used in the UK. However, the regulator emphasises that labels alone do not adequately determine compliance. Placement should not be a secondary design choice and children must not be able to access pornography before verification. For user-generated pornography services in particular, the expectation is that age checks belong at entry.

Overall, Ofcom considers a front gate (a blank landing page, no content visible until the age check is completed) to be the safest and cleanest compliance route for dedicated pornography services – whether the material is user-generated or published by the provider. Looking ahead, the regulator will continue engagement and monitoring across the adult sector, with a view to identifying and addressing non-compliance. A report on age assurance, which is scheduled for publication by July 2026, will assess how services, including pornography services, use age assurance to meet the OSA, evaluate its effectiveness, and identify barriers to effective implementation.

Age checks: Why their placement matters in pornography

https://www.ofcom.org.uk/online-safety/protecting-children/age-checks-why-their-placement-matters-in-pornography

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Protecting children from harms online – Volume 4: What should services do to mitigate the risks of online harms to children?

https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/volume-4-what-should-services-do-to-mitigate-the-risks-of-online-harms-to-children.pdf?v=403139

Protection of Children Codes

https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/statement-protecting-children-from-harms-online

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