ONE CLICK GROUP

ISO 27566-1 Practice Statement

Solution Owner: One Click Group

One Click Group is a(n) Age Assurance Provider (an entity responsible for providing age assurance results to a relying party)

This is a practice statement for the age assurance solution known as One Click Services

The system and practice statement are kept under continuous and regular review in the following way:

Our system and practice statement are maintained under continuous and regular review through a structured governance framework led by top management. This includes scheduled periodic evaluations, both internal and external audits, and monitoring of compliance with applicable standards such as the Information Security Framework and iRAP assesment to the level of Official:Sensitive and the draft ISO 27566-1.

Top management actively participates in reviewing performance metrics, risk assessments, and feedback mechanisms to ensure the system remains effective, up-to-date, and aligned with legal, regulatory, and technological developments. Any identified areas for improvement are documented, actioned, and integrated into the practice statement, ensuring continuous enhancement and accountability at the highest level.

This solution is designed to test the following age eligibility requirements:

At One Click Services, age-related eligibility decisions are determined based on specific thresholds established by relevant policymakers, including the Australian Government, regulatory bodies such as the Office of the eSafety Commissioner, and compliance with frameworks such as the Online Safety Act 2021 and Privacy Act 1988.

Our services apply age-related eligibility requirements for access to certain features or content, specifically for individuals aged 16 years and over, 18 years and over, and 65 years and over, depending on the nature of the service provided (e.g., eligibility for tax return assistance at 16+, access to financial tools at 18+, and senior-specific support services at 65+).

These age thresholds have been established to ensure compliance with legal, privacy, and risk-based policies governing digital services. Age verification can be conducted using tools developed both in-house and by our partners; Microsoft Azure, Connect ID's, and the Attorney Generals Department, using a secure data exchange.

This solution utilizes the following Age assurance components:

Our age assurance system leverages a suite of in-house and third-party technologies to establish robust, accurate, and compliant age assurance outcomes. We utilise multiple verification methods tailored to the level of assurance required, in alignment with Australian regulatory frameworks and international standards.

We use authoritative sources to obtain and verify user age information. These include:
E-Passport NFC verification: Utilises the embedded chip in passports to extract and validate user identity and age, ensuring data authenticity directly from government-issued documents.
ConnectID's bank verification: Leverages Open Banking consent-based identity verification, linking age and identity information securely from authorised financial institutions.
Document Verification Service (DVS): As a Gateway Service Provider under the oversight of the Attorney-General's Department, we access the DVS to verify government-issued credentials (driver's licences, passports, etc.) against official issuing records.

All of these are considered primary credentials and are validated against authoritative data sources.

To further strengthen verification, we use Azure's AI-powered liveness and likeness checks. This includes:
Liveness detection: Confirms the user is present during verification (i.e., not a spoof or replay).
Likeness verification: Compares the user's live image to their ID photo to confirm identity and indirectly support age validation.

By combining E-Passport NFC technology, bank-based verification, AI-driven liveness and likeness detection, and authoritative credential validation via DVS, One Click Services ensures that age assurance results are accurate, secure, and aligned with regulatory and privacy requirements. This multi-layered approach enables us to meet the age thresholds of 16+, 18+, and 65+ with high confidence and accountability.

This solution delivers results to meet the following Indicators of confidence:

The confidence level in our age assurance outcomes is determined by the strength of the evidence sources, the rigour of the verification methods employed, and the layering of independent checks throughout the process.

Our system achieves high confidence indicators by combining authoritative data sources, real-time biometric checks, and secure credential validation, ensuring the reliability and integrity of each age assurance result. We utilise age verification only and do not use, nor promote, age inference or age estimation methods.

The solution applies the following Binding process:

The age assurance result is securely bound to the correct individual through a multi-factor process that includes user input cross referenced with verification of authoritative identity documents or bank-based verification, and biometric checks.

Once verified, the age assurance result would be linked to the user's account using unique identifiers, ensuring consistent and traceable association for all future interactions, with all verification events securely logged for audit and compliance purposes.

The solution achieves Privacy and data protection as follows:

At One Click Services, we are committed to protecting user privacy and comply with applicable data protection laws, including the Privacy Act 1988 (Cth), Consumer Data Rights (CDR), the Identity Verification Services (IVS) Act, and follow the Australian Government Information Security Manual (ISM) and IRAP assessments under the Official: Sensitive classification.

Our age assurance system supports key privacy characteristics such as data minimization, purpose limitation, transparency, and accountability, processing only the minimal personally identifiable information (PII) necessary to meet legal obligations and achieve the required confidence indicators for age verification. PII is used for the purpose of identity verification only, no data on any provided documents is retained, only the result. Individuals have full rights to access their data, challenge decisions based on inaccurate or incomplete data, and seek review of automated decisions, with robust processes in place for handling data breaches in line with the Notifiable Data Breaches (NDB) Scheme.

Regular audits and annual penetration tests are conducted to ensure ongoing compliance and the highest standards of privacy and security.

The solution demonstrates ease of use as follows:

Our age assurance methods are designed to offer functionality that is appropriate to the capacity and age of both children and adults, ensuring a balance between user accessibility and robust verification. The ability to leverage both identity documents, and verify via bank accounts, give users different pathways to prove their age.

Our approach is a choose your own adventure where API offerings can be implemented and utilised depending on the specific use case. Our suite of developer-friendly APIs allows service providers to integrate age assurance functionality in a way that is adaptable to the user experience needs of their specific platforms. We provide complete guidance to ensure the system is used responsibly following best privacy and security practices. This flexibility ensures that the age assurance process remains proportionate to the user's capacity and keeps the user journey within portal.

Security measures applied to the solution are as follows:

At One Click Services, our age assurance system is designed and operated in alignment with the security characteristics outlined in this document, with full support for confidentiality, integrity, availability, resilience, and auditability. We adhere to the Australian Government Information Security Manual (ISM) and undergo IRAP assessments under the Official: Sensitive classification, ensuring that data is securely transmitted, processed, and stored using encryption, access controls, and monitoring. The system undergoes regular audits, including annual penetration tests, to validate security posture and resilience against threats.

All age assurance processes are logged and auditable, ensuring traceability and accountability. Robust business continuity and incident response plans support system availability and resilience, ensuring that age assurance services remain secure and reliable across all use cases.

The solution protects human rights in the following ways:

At One Click Services, we ensure that the implementation of our age assurance system is accessible, inclusive, and proportionate, supporting both children and adults in accessing services to which they are reasonably entitled.

We offer multiple verification methods that can be tailored to the context and risk level, avoiding undue restriction or exclusion by providing low-friction options where appropriate. Comprehensive and meaningful information is required to be provided upfront—including the purpose of age checks, how data is handled, and user rights—ensuring informed consent and transparency.

Format and delivery are determined by the client utilising the API suites.

The solution has been subject to audit, certification and review in the following ways:

Our age assurance system, practice statement, and operational approaches are subject to annual internal reviews, third-party audits, and formal certifications to ensure ongoing compliance, effectiveness, and security. We adhere to the Australian Government Information Security Manual (ISM) and undergo annual IRAP assessments under the Official: Sensitive classification. The most recent organisation-wide audit was conducted in October 2023 by Gareth Willis, with qualifications of; IRAP Assessor, ISO27001 LA, SABSA, GSEC, GCIH, CISSP. The next audit date for this practice is set for August 2025. The audit reviewed system architecture, security practices, with the major finding confirming strong alignment with ISM requirements. Continuous monitoring, periodic penetration testing, and audit-driven improvements ensure that our age assurance framework remains robust, transparent, and responsive to evolving standards and risks.

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