Buckinghamshire&Surrey
trading standards




# GUIDANCE

## How Innovative Technology's age estimation technology (including digital ID) can be used in a retail setting

Innovative Technology®
POWERING TRANSACTIONS AND INTERACTIONS

This advice is issued by Buckinghamshire and Surrey Trading Standards Service under the Primary authority scheme
Date: August 2026

## PURPOSE OF THIS GUIDANCE

This guidance explains how Innovative Technology's age estimation products can be used in retail to support a retailer's Age Verification Policy (for example, **Challenge 25**) and/or to integrate age checks into a **POS** (Point of Sale) or **SCO** (Self-Service Checkout) environment.

It is intended to:

- Help retailers deploy the technology lawfully and consistently
- Set out clear, practical steps for frontline staff
- Demonstrate how the solution supports a retailer's existing age-check policy, rather than replacing it

## MYCHECKR / MYCHECKR$^{MINI}$ | ASSISTED ANONYMOUS AGE ESTIMATION

**MyCheckr and MyCheckr$^{Mini}$** are assisted anonymous age estimation devices used at point-of-sale to help staff decide whether to request proof of age when selling age-restricted goods. The device estimates age by analysing facial features. The recommended retail configuration is **Challenge 25.**

MyCheckr should be configured so that:

- **Fail** = customer estimated under 25 - ID must be requested
- **Pass** = customer estimated 25 or over - sale may proceed subject to staff judgement



**Figure 1:**
MyCheckr placed at the till point for Assisted Age Estimation

MyCheckr/MyCheckr$^{Mini}$ displays a clear "pass/fail" style outcome to the customer and till operator via a LED and a display screen (MyCheckr only).

LED Colours:

- **Blue** (IDLE)
- **Red** (ID check required) – ID must be requested
- **Green** (appears 25+) – Sale may proceed

MyCheckr / MyCheckr$^{Mini}$ is intended to:

- Support staff decision-making and help ensure a retailer's age-check policy is consistent and effective
- Act as a deterrent to underage attempts to purchase age-restricted items
- Help reduce confrontation by providing staff with a clear, consistent prompt to request ID and giving customers clear visibility that the device is requiring an ID check.

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## HOW IT WORKS

- An integrated camera automatically analyses the customer's face (from approx. 1M distance)
- MyCheckr includes a customer-facing screen and an LED indicator visible to staff and customer (figure 2)

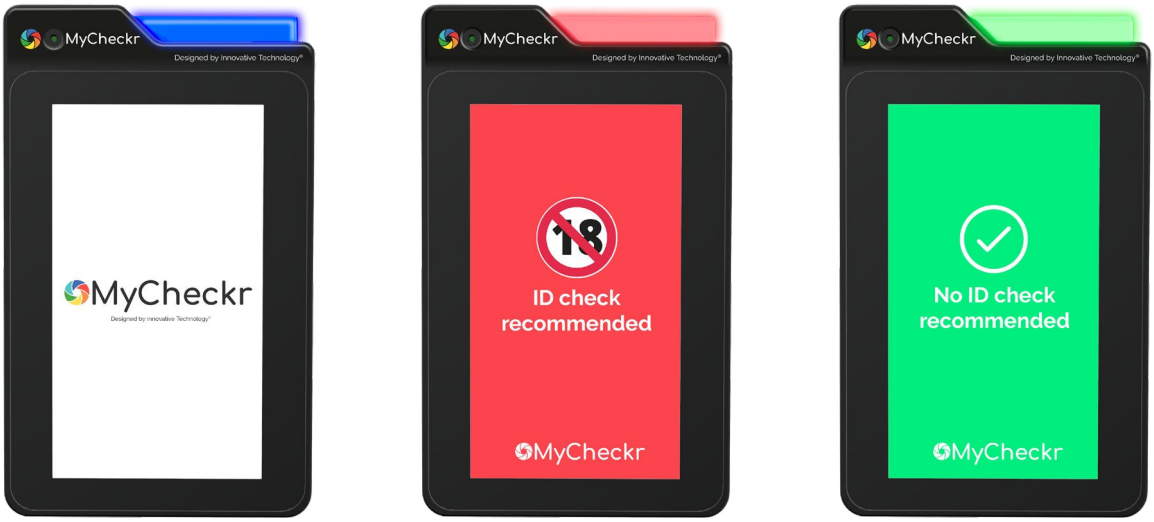



**Figure 2:**
The MyCheckr device illustrating IDLE (Blue), FAIL (Red) and PASS (Green)

- MyCheckr$^{Mini}$ is a compact version (no built-in screen) but can be configured to perform the same age-check function (figure 3).




**Figure 3:**
The MyCheckr$^{Mini}$ device illustrating IDLE (Blue), FAIL (Red) and PASS (Green)

Figure 7 illustrates a full recommended staff operating procedure of how MyCheckr / MyCheckr$^{Mini}$ can be used in an Assisted Age Estimation scenario.

## DATA HANDLING AND PRIVACY

- The analysis is performed for age estimation
- Images/data are automatically deleted after the estimation is completed
- The system does not use or retain any personal data as part of the age estimation process

- The ICO (Information Commissioners Office) states age estimation could involve biometric data, but it is only treated as biometric data under UK GDPR if it is used to uniquely identify someone. The ICO also states that, for the Children's Code, using biometric data can be lawful where it is necessary for substantial public interest (UK GDPR Article 9(2)(g)).

- In a retail context, preventing under 18s from accessing age-restricted goods is a safeguarding objective aligned with this approach. This links to the UK's domestic law basis for Article 9(2)(g), including the Data Protection Act 2018 Schedule 1 substantial public interest conditions (notably safeguarding of children and individuals at risk)[1].

[1] Information Commissioner's Office

## PLACEMENT AND SETUP

Place MyCheckr / MyCheckr$^{Mini}$ at the point of sale where the camera has a consistent view of the customer's face. The MyCheckr has various options for mounted (outlined in figure 4). The MyCheckr$^{Mini}$ has a ¼ inch mounting (standard camera thread) for easy installation and mounting.

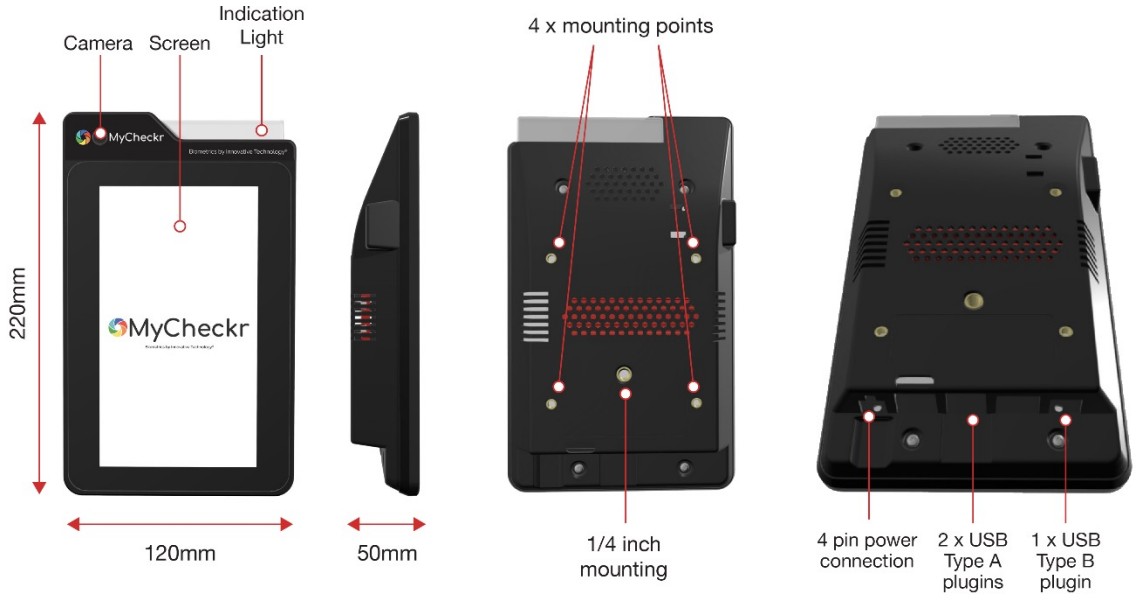



**Figure 4:**
Dimensions and mounting points for MyCheckr

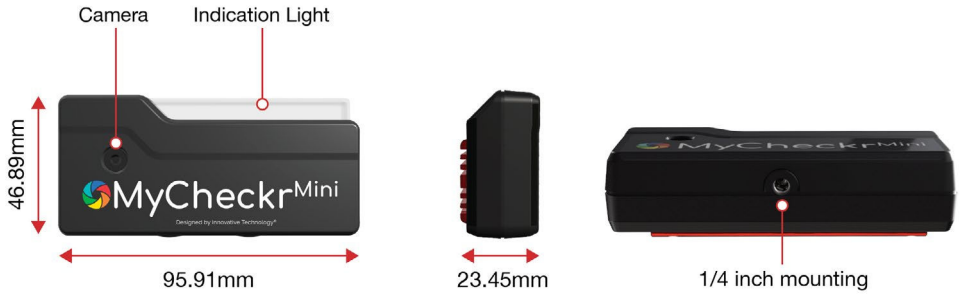



**Figure 5:**
Dimensions and mounting point for MyCheckr$^{Mini}$

## KEY CONSIDERATIONS

- Install securely so it cannot be easily moved or misaligned
- Follow manufacturer guidance on height, distance, and angle
- MyCheckr also guides the user through several steps to ensure optimal placement and setup of the device. These recommendations can be seen in figure 6.

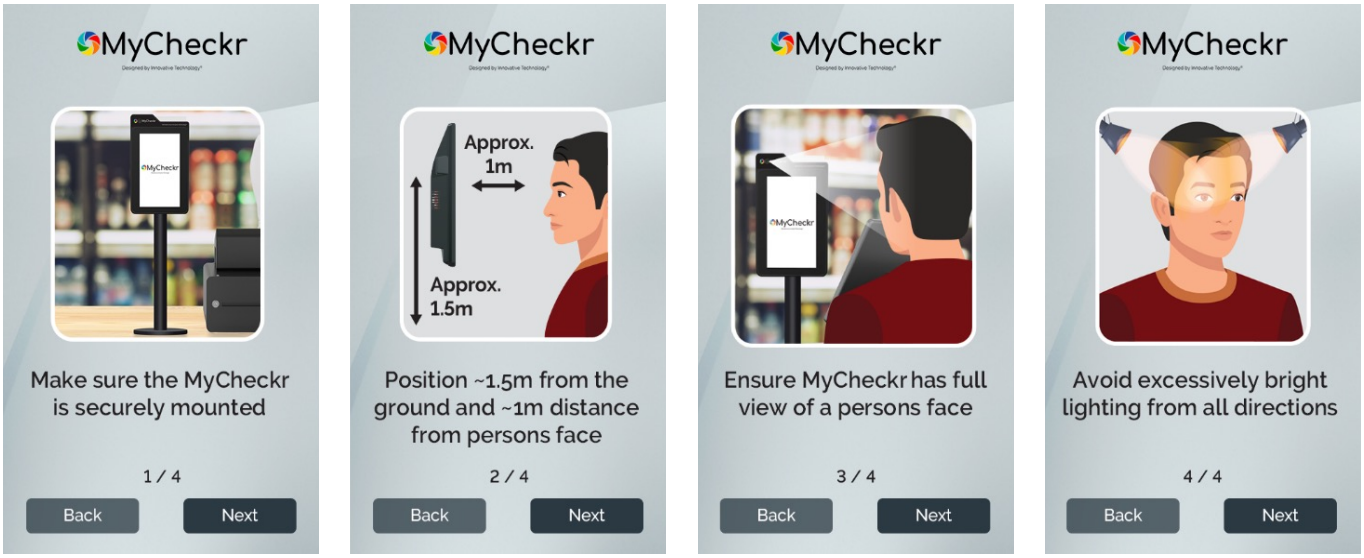



**Figure 6:**
Guidance to user for optimal placement of MyCheckr

## RECOMMENDED STAFF OPERATING PROCEDURE

Once the MyCheckr / MyCheckr$^{Mini}$ is installed and working as expected, the following workflow is recommended to ensure optimal deployment of the solution.

**Step 1** - Customer is detected at the till and estimates age
- The device automatically estimates age and shows Red/Green

**Step 2** - If the device shows fail (red, under 25)
- The staff member must request physical ID, even if they personally believe the customer looks old enough
- The sale should only proceed if acceptable proof of age is presented and verified

**Step 3** - If the device shows pass (green, 25 or over)
- Staff should still look at the customer and confirm they appear clearly over 25
- If the staff member has any doubt, they should request ID in the normal way

## INDEPENDENT CERTIFICATION - ISO/IEC 27566-1:2025

MyCheckr, MyCheckr$^{Mini}$ and ICU Lite have been independently certified under ISO/IEC 27566-1:2025 — the international standard for age assurance systems — by the Age Check Certification Scheme (ACCS).

ISO/IEC 27566-1:2025 sets out the requirements for how age assurance systems should be designed, tested and operated. Certification against the standard means the product has been assessed by an independent, UKAS-accredited certification body against a formal international framework covering purpose, data minimisation, transparency, accuracy, security, and user redress.

**For retailers, this delivers three practical changes:**

**• Trust**
Independent, third-party validation that the system does what it says. Retailers can cite the certification in their Age Verification Policy and staff training materials as external evidence that the technology meets a recognised standard, rather than relying solely on supplier claims.

**• Confidence**
A defensible compliance position. Certification supports the retailer's due-diligence obligations under UK licensing law and the Data Protection Act 2018 Schedule 1 substantial public interest conditions. It also aligns with the ICO's expectations for age assurance and with UK GDPR Articles 25 (data protection by design) and 32 (security of processing).

**• Performance**
Tested and ongoing. Certification is not a one-off badge: ACCS conducts initial testing and continuing surveillance against the standard's requirements for accuracy, presentation-at-tack detection and privacy-by-design. The product is measured against defined performance thresholds rather than self-declared metrics.

Certification applies to the age estimation function in the standard configurations of MyCheckr, MyCheckr$^{Mini}$ and ICU Lite. It does not remove the requirement for staff judgement, particularly for alcohol sales, where mandatory licensing conditions continue to apply.

**CERTIFIED AGE ASSURANCE**
MyCheckr | MyCheckr$^{Mini}$ | ICU Lite
ISO/IEC 27566-1:2025 certified by the Age Check Certification Scheme (ACCS)

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# DIGITAL ID ON MYCHECKR - VERIFICATION THROUGH LUCIDITI

## THE LUCIDITI PARTNERSHIP

Innovative Technology has partnered with Luciditi to integrate digital proof-of-age verification into MyCheckr. Customers can present a supported digital ID to the same device used for anonymous age estimation, bringing both functions into one checkout workflow without a separate staff smartphone or tablet. [1]

Luciditi is the trading name of Arissian Ltd, which is listed on the government's Digital Verification Services (DVS) register. Retailers should confirm that the specific service deployed remains certified and registered for its intended role. [2]
As part of the Luciditi DVS interoperable network, MyCheckr can accept Luciditi, Yoti ID and Post Office EasyID as well as the forthcoming UK Digital Driving Licence.

## WHY A CERTIFIED AND REGISTERED DVS MATTERS

For alcohol sales in England and Wales, digital ID must be checked electronically by a certified, registered DVS providing age verification at the required confidence level. Looking at an app, photograph or screenshot is insufficient. The licence holder must have an agreement with the registered DVS specifying verification to at least a medium level of confidence. Registration helps establish that the service has been independently assessed against the UK DVS trust framework, including safeguards against impersonation. [3]

MyCheckr's age estimation result and its ISO/IEC 27566-1:2025 certification do not replace this DVS check. Age estimation is not digital proof of age and cannot verify eligibility to purchase alcohol. [3]

## RECOMMENDED CHECKOUT PROCEDURE

**1. Estimate age**
MyCheckr scans the purchasing customer. Under Challenge 25, red means estimated under 25 and ID is required; green means estimated 25 or over. Staff must still make their own visual assessment for alcohol sales and request ID if in doubt.

**2. Offer proof-of-age options**
If ID is required, request acceptable physical ID or, where enabled and accepted, a supported digital ID. An age-estimation result is not digital proof of age.

**3. Open the digital ID**
The customer opens their supported digital ID app on their phone and displays the QR code from a certified, registered DVS provider (i.e. Luciditi).

**4. Scan and verify**
The customer presents the phone screen to MyCheckr. MyCheckr scans the QR code and completes the integrated electronic verification. Staff must not rely on visual inspection of the phone screen alone.

**5. Read the result**
MyCheckr displays either over 18 or under 18. An over-18 result confirms the digital age check, subject to staff authorisation and other sale checks. An under-18 result means the alcohol sale must be refused.

**6. Handle failures and authorise**
If verification fails or is unavailable, request acceptable physical ID; refuse the sale if age cannot be established. Confirm the result relates to the purchaser. Staff retain oversight of intoxication, proxy purchases and licence conditions; self-service checkouts must remain supervised. [1, 3, 4]

## IMPLEMENTATION AND DATA PROTECTION

Acceptance of digital ID is optional. Update the Age Verification Policy and staff training to explain this alternative to physical ID. Check local licence conditions and the service agreement. Process only necessary personal data; the anonymous age-estimation privacy statements do not describe the digital ID process. [3, 4]

[1] Innovative Technology: MyCheckr and the Luciditi partnership (16 September 2026).
[2] GOV.UK DVS register: Arissian Ltd (trading as Luciditi), provider and services.
[3] Home Office: Licensing Act section 182 guidance (November 2026), paras 10.45-10.63.
[4] OfDIA: How digital verification services can support alcohol purchases (17 August 2026).

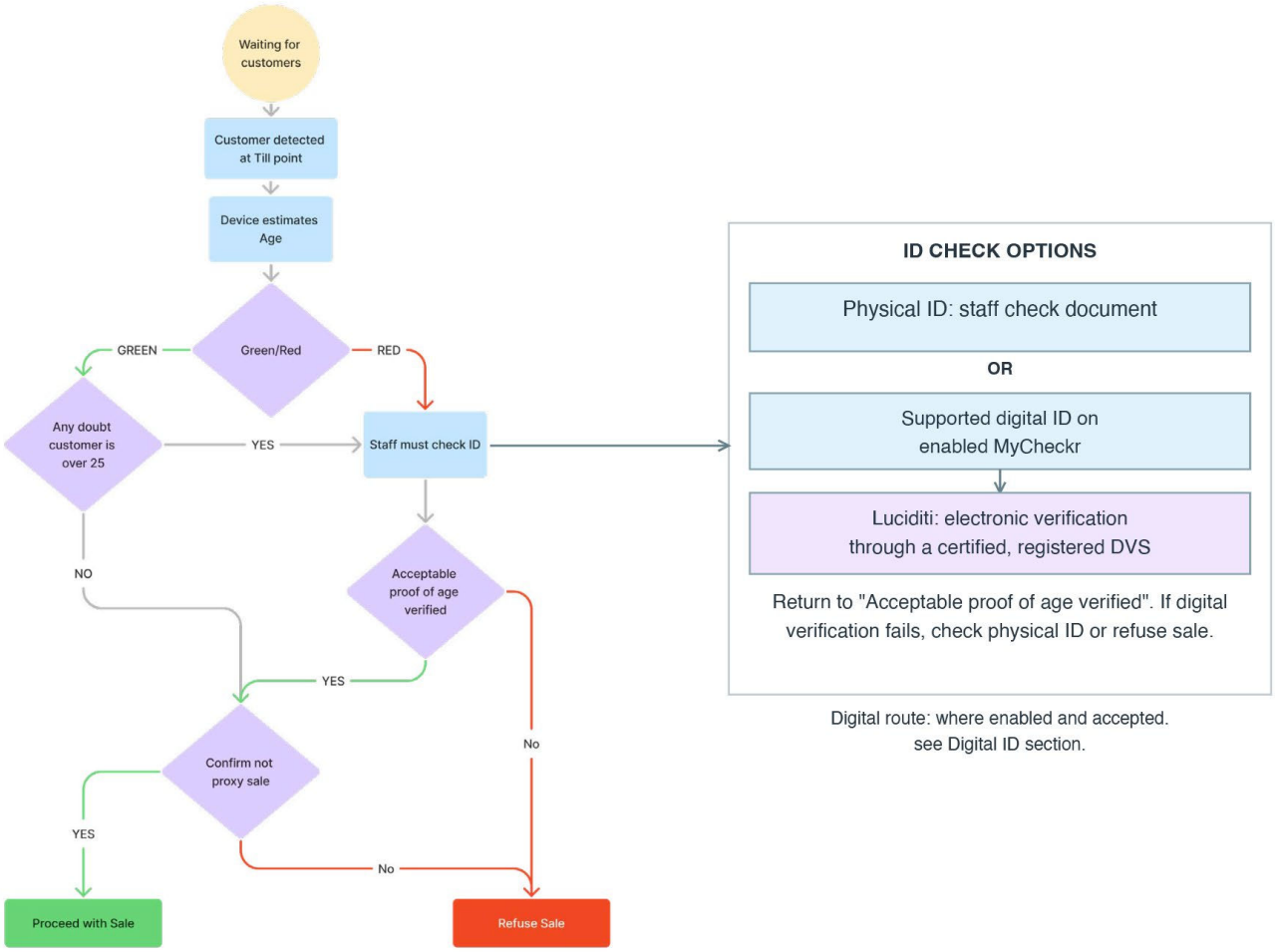



**Figure 7:**
Recommended workflow for using MyCheckr / MyCheckr$^{Mini}$ in the age check process

## GROUPS AND PROXY SALES RISK

When multiple customers are together:

- Ensure the purchasing customer is the person who has been scanned and received the result
- If staff suspect proxy purchasing (e.g., a group of young people), staff should request ID from all relevant individuals as per store policy

## ALCOHOL SALES (MANDATORY STAFF JUDGEMENT)

For alcohol sales, MyCheckr / MyCheckr$^{Mini}$ must be used as a guide only.

- Staff must be confident to follow their judgement and the store's licensing obligations

## CUSTOMER NOTICE / TRANSPARENCY

A clear notice should be displayed on or near the device stating that:

- Age estimation is being used to support Challenge 25 checks
- Images/data are not retained and are deleted automatically after the check

## ICU LITE, MYCHECKR, MYCHECKR$^{MINI}$ INTEGRATION INTO POS/SCO

The technology can also be integrated into a Point of Sale (POS) or Self-Service Checkout (SCO).

- When integrated into a POS system, the device can still perform an Assisted Age Estimation function but can additionally link specific purchases to the age range and gender of the customer.
- When integrated into a SCO system the system can make the sale of age restricted products (excluding alcohol) fully automated.
- MyConnect solution (MyConnect Hub and MyConnect App) from Innovative Technology can be integrated to receive remote alerts and allow remote approval of age restricted sales.




**Figure 8:**
Illustration of a MyCheckr Device integrated into SCO

# SEMI-AUTOMATED SALES (NON-ALCOHOLIC PRODUCTS)

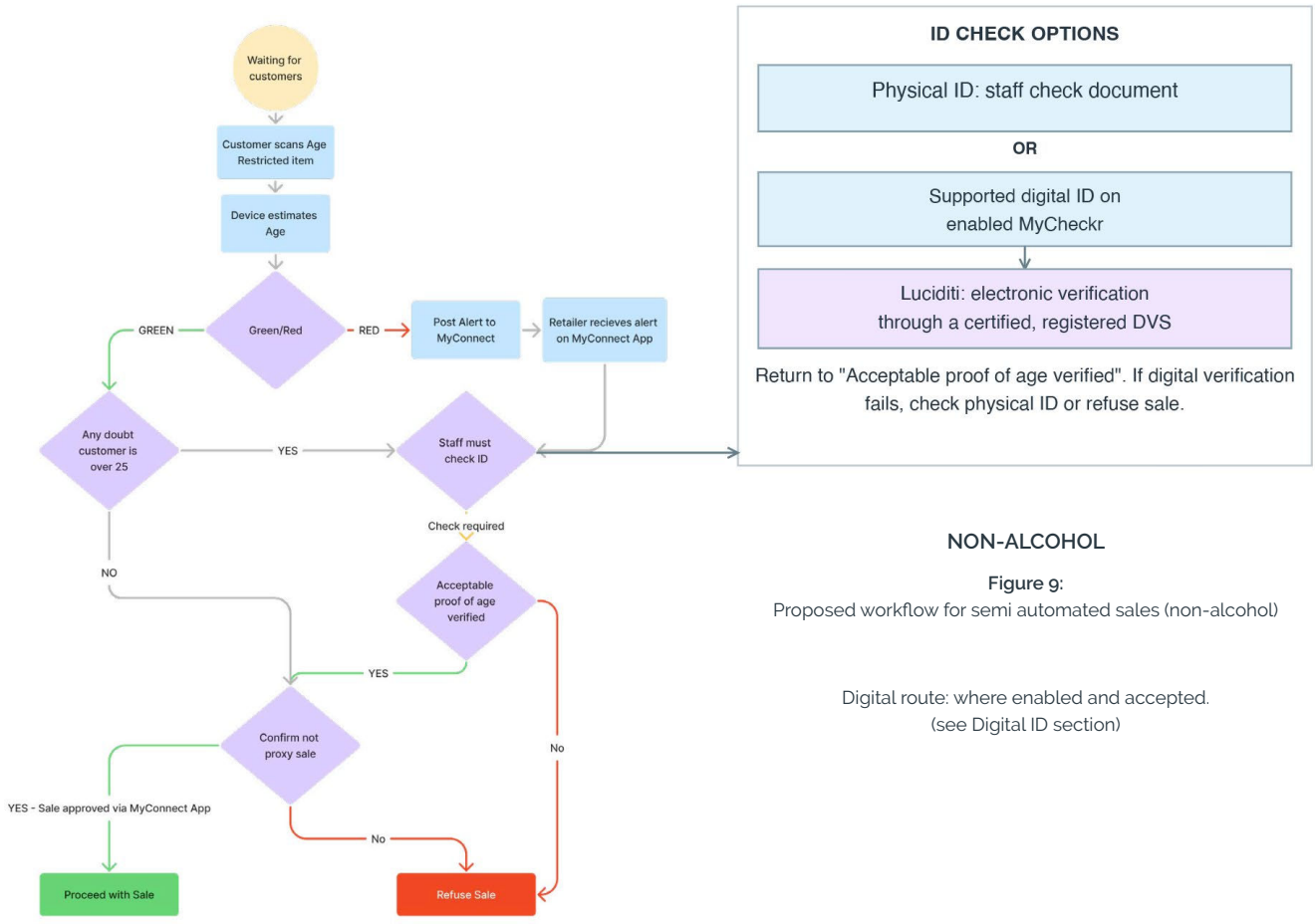
- In the case of non-alcohol sales – an Alert can be posted to the MyConnect App where a human can intervene and either approve or deny the purchase (see figure 9).

- Where the process is automated, checkouts must be closely supervised to reduce fraudulent behaviour, including:
    - An older customer scanning their face to pass the check for a younger person
    - Proxy purchasing behaviour
    - Presentation attack (where customer is presenting a photo/video to the system. The system does have presentation attack detection which will prevent any processing – however staff should always be vigilant to detect these attacks.

Supervision can be:

- In person by floor staff - checking ID where necessary and authorising sales on the checkout.
- Remotely supported - checking the image of the customer on the MyConnect App and also looking at the customer to ensure they are happy for the sale to go ahead. The sale can be authorised remotely on the app when ID is not required.

Figure 9 illustrates the suggested workflow for dealing with non-alcohol products in a self-service checkout.




NON-ALCOHOL

**Figure 9:**
Proposed workflow for semi automated sales (non-alcohol)

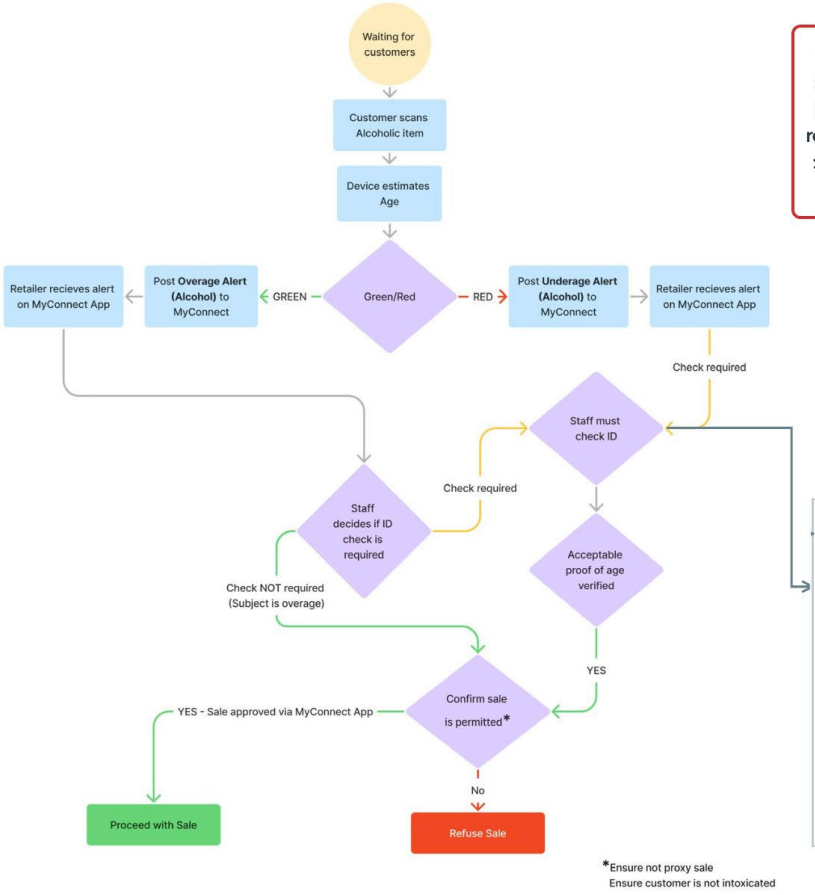
Digital route: where enabled and accepted.
(see Digital ID section)

## MYCONNECT AUTOMATED FLOW (ALCOHOL PRODUCTS)

The MyConnect App will receive an alert for all alcoholic purchases (see figure 10) –this ensures human intervention in accordance with the licensing requirements. The staff member must be in the same area of the shop so that they have physical sight of the customer to decide whether they appear to be over 25. If they are not sure the customer is over 25, or if an underage alert has shown up, physical ID must be requested and checked. If an overage alert has been received, and the staff member is happy that they over 25, the sale of alcohol can be approved either in-person at the POS, or via the app within line of sight of the customer

Where configured, the customer image and result can be displayed remotely via the MyConnect Hub, allowing:

- Multiple devices (MyCheckr / MyCheckr$^{Mini}$ / ICU Lite) to be monitored centrally
- Alerts to be sent to a supervising staff member (e.g. on the MyConnect App)
- Faster decisions when a self-checkout requires intervention




**Because of the mandatory licensing conditions, for alcohol sales, staff may use the Age Estimation as a guide only, but must always carry out their own visual check in the normal way. In practice this requires that Supervision must mean authorisation by a person over 18 and fully trained, who is in the same room as the purchaser and has full sight of them. Any training must reflect this.**

ALCOHOL

Figure 10:
Proposed workflow for fully automated sales (alcohol)

**ID CHECK OPTIONS**

Physical ID checked by staff

**OR**

Digital ID on enabled MyCheckr:
Luciditi certified, registered DVS check

Return to proof-of-age decision. Failed digital check: physical ID or refuse. Staff authorisation still required.

Where enabled and accepted.
See Digital ID section.

## ALCOHOL SALES: STAFF AUTHORISATION REQUIRED

Customer scans an age-restricted item; ICU Lite / MyCheckr / MyCheckr$^{Mini}$ estimates age.

- Pass (25+): staff must be satisfied the customer appears over 25, using the technology only as a guide, before authorising the sale.
- Fail (<25), or any doubt: staff must request and verify acceptable ID.
- Alcohol sales must not proceed automatically on age estimation alone.

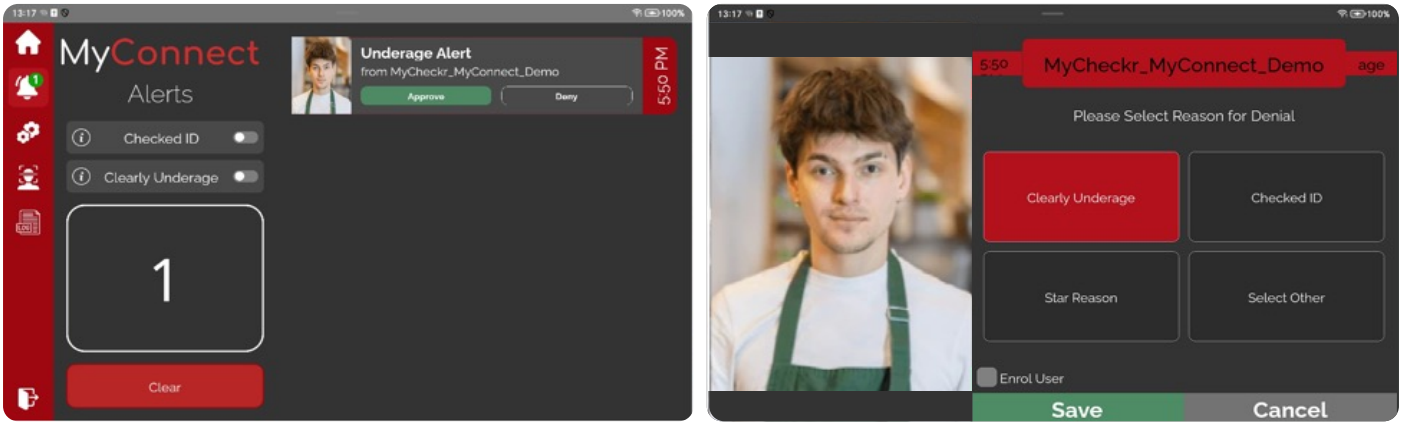



**Figure 11:**
Example of 1) Alert received on the MyConnect App and 2) Reason for approval/denial (will be saved in audit log)

## AUDIT LOG (MYCONNECT HUB)

MyConnect will maintain an audit history to support internal compliance and demonstrate due diligence.

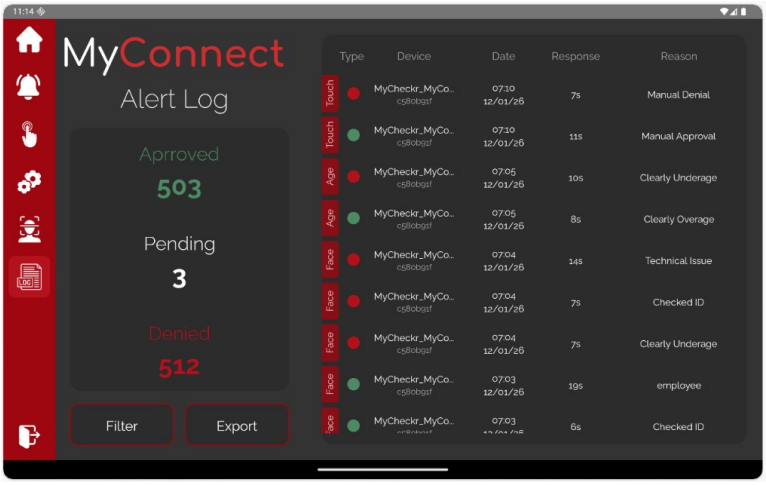



**Figure 12:**
Example of the Audit Log
(automatically created by the MyConnect solution)

The audit log can include:

1. Outcome counts per device (e.g., under/over threshold outcomes)
2. Date and time of each event/alert
3. User/Staff member who approved/denied the purchase
4. Recorded reason for allowing/denying (e.g., "ID checked", "clearly over 25")
5. Response time (how long it took to respond to the alert)
6. Filtering by date/time range and device
7. Export to CSV and/or report format for review and compliance purposes