

Age Assurance Technology Trial

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A-1.4.1 Initial Impartiality Report

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Initial Impartiality Report

Introduction

This report outlines the key risks to impartiality in the Age Assurance Technology Trial, an Australian government-funded initiative aimed at evaluating the effectiveness, reliability, and public acceptance of age verification technology. As this trial is publicly funded and touches upon sensitive areas such as data privacy, child protection, and technology evaluation, it is critical to identify and mitigate any risks to impartiality that could affect the trial’s outcomes, stakeholder trust, and public perception.

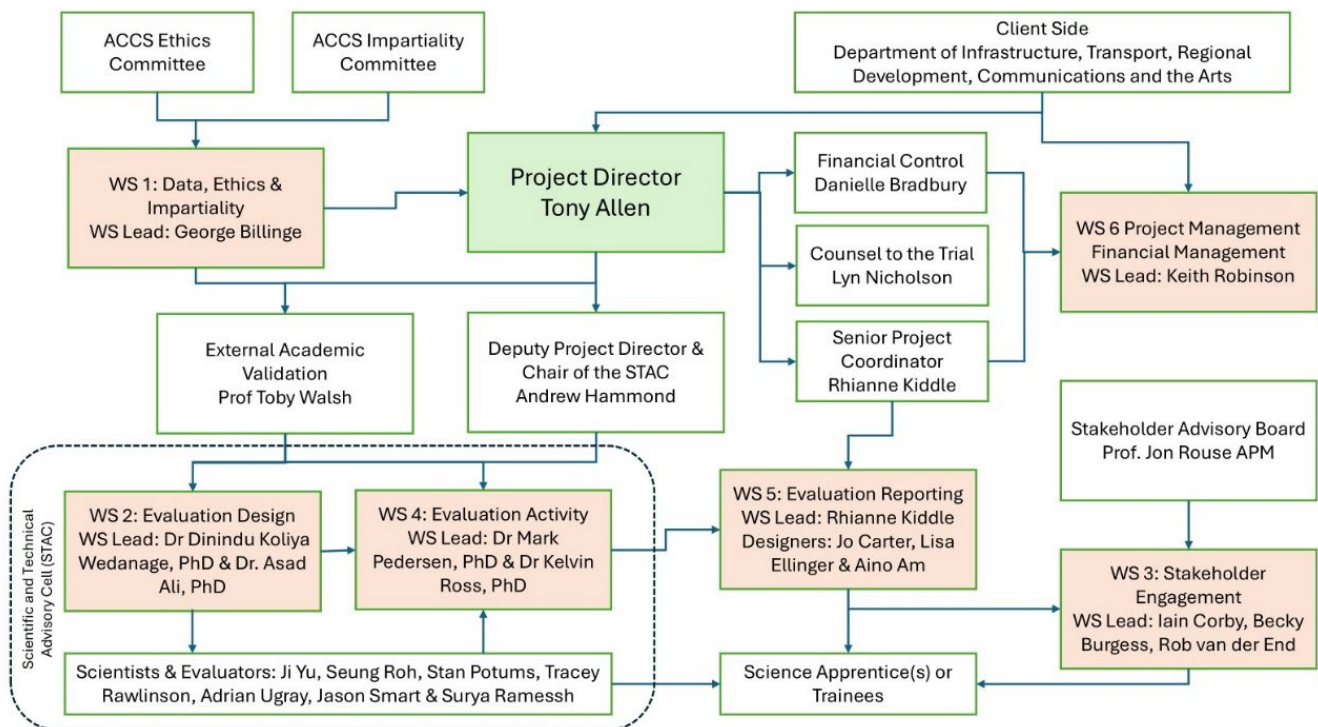
ACCS has been awarded this contract by the Australian Government as principal contractor.

Approach to Impartiality in the Project

We have teamed up with Australian company, KJR software, AI and UX testing consultants in Canberra and Sydney to develop a comprehensive programme of evaluation and testing of age assurance systems in this trial. We have set out six workstreams to provide 17 project deliverables and the four milestones requested by the tender (project plan; agreed trial programme; preliminary report and final report).

Our Project Plan

We explained this in more detail in our tender proposal, but at a high level, here is our overall project structure:





Our Project Team

We have put together an eminent team of specialist scientists, independent validation, stakeholder advisory, communications, project management and delivery partners. Our objective is not only to deliver scientific testing of the full range of age assurance methods and approaches, but also to gather feedback from a diverse population of Australian users by conducting the trial as much as possible in the context of existing real-world deployments.

Our 20-person strong core team is led by Project Director Tony Allen, Subject Matter Expert on ID & Age Assurance, Editor of ISO/IEC 27566 Age assurance systems international standards and our Chief Executive. Our Deputy Project Director is Andrew Hammond, Software Testing Specialist, Contributing Expert on ISO/IEC 29119 Software testing international standards and General Manager at KJR. Our Project Coordinator is age assurance regulatory and policy specialist and highly experienced PM² project manager Rhianne Kiddle. We then have four PhD level eminent and specialist scientists to design and implement the evaluation plan; seven product test engineers; a team of three graphic designers and data visualisation specialists for report production; three stakeholder and engagement specialists and Counsel to the Trial, Lyn Nicholson of Holding Redlich. Collectively, they will deliver approximately 1,422 person days of activity over a 166 working day project.

We have built in independent scrutiny including validation of our proposed approach to evaluation by Prof. Toby Walsh, Laureate Fellow, Scientia Professor of AI and Chief Scientist at the University of New South Wales’s AI Institute. We also have a Stakeholder Advisory Board chaired by Jon Rouse APM, Professor AiLECS Labs at Monash University, an Ethics Panel chaired by George Billinge (former Senior Policy Manager for Age Assurance at OFCOM) and our usual ACCS Impartiality Panel required as a part of our existing accreditation.

The Project Plan has the following entry for securing impartiality:

<p>T1.4 Impartiality Mechanism – This task involves the submission of project proposal, project plan and final report to the ACCS Impartiality Panel (as its established impartiality mechanism under ISO 17065). This will include the creation of a conflict of interest (#RFT 3.1.5) declaration and register which will be applicable throughout the project.</p>	<p>A-1.4.1 Initial Impartiality Report [M1] A-1.4.2 Conflict of Interest Register [M1] A-1.4.3 Mid-Project Impartiality Report [M4] D-1.4 Final Project Impartiality Report [M7]</p>
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Key Risks to Impartiality

1. Funding Source and Expectations

Risk: Since the trial is funded by the Australian Government, there is a potential risk of perceived pressure to achieve favourable results that align with government interests, such as endorsing the technology for



regulatory applications. Stakeholders may perceive that the government's involvement could bias the trial outcomes.

Mitigation: Implement clear separation protocols between the project team and government representatives to ensure autonomy in trial procedures, data interpretation, and reporting. Regular reviews by the Impartiality Committee will reinforce independence.

2. Selection of Technology Vendors

Risk: The selection of specific age assurance technology vendors may introduce biases, particularly if vendors have existing relationships with government or regulatory bodies. There is also the risk that the trial might favour vendors with particular technological approaches, such as biometrics, over others.

Mitigation: The vendor selection process will adhere to a transparent and competitive process, with criteria reviewed and approved by the Impartiality Committee. Selected vendors will be required to disclose any previous relationships with government entities, ensuring transparency.

3. Data Privacy and Security Concerns

Risk: Age assurance trials involve handling sensitive data, including personal and potentially biometric information. Public concerns regarding data security and privacy may lead to scepticism about impartiality, especially if stakeholders perceive that privacy concerns are underrepresented.

Mitigation: A robust data privacy and security framework will be implemented, compliant with both Australian privacy laws and international standards (e.g., GDPR equivalency for biometric data). An independent privacy audit will be conducted, with findings reported directly to the Impartiality Committee.

4. Potential Conflicts of Interest Among Project Participants and Contractors

Risk: Members of the Project Team and Contractors may have undisclosed relationships with vendors, government representatives, or other stakeholders involved in the trial. This could affect their objectivity in overseeing the trial and reviewing impartiality measures.

Mitigation: All committee members will undergo a conflict of interest review, and any affiliations with stakeholders must be disclosed. Recusal procedures will be in place for members with identified conflicts during specific decision-making processes.

5. Public Perception and Media Influence

Risk: Media coverage and public opinion can exert pressure on the trial's perceived impartiality, especially if coverage suggests bias or insufficient transparency in trial operations. Negative perception may undermine confidence in the technology, regardless of trial outcomes.



Mitigation: The project team will engage in proactive and transparent public communication, publishing regular updates and trial outcomes. A communication strategy focusing on openness, including public Q&A sessions, will be maintained to ensure accountability and counteract misinformation.

6. Bias in Methodology or Outcome Reporting

Risk: There is a risk that methodology or reporting may inadvertently favour certain outcomes or technologies, especially if particular methods yield more favourable results. This could lead to skewed interpretations that align with pre-existing expectations or stakeholder interests.

Mitigation: The trial's methodology will undergo rigorous peer review, ensuring adherence to scientific rigor and objectivity. The Impartiality Committee will review final reports before publication to verify that data analysis and conclusions remain unbiased.

Conclusion and Recommendations

The Age Assurance Technology Trial presents several key risks to impartiality, particularly concerning government influence, vendor selection, data privacy, and public perception. By implementing the above mitigation strategies, the project team aims to maintain a high standard of impartiality and transparency throughout the trial. Regular oversight from the Impartiality Committee will be critical in upholding these standards, ensuring that all stakeholders can trust the trial's outcomes and methodologies.

Recommended Actions:

1. *Approve the mitigation strategies outlined in this report.*
2. *Note the Schedule of Impartiality Input to the Project Timetable*
3. *Publish a summary of impartiality measures on the trial's website to reinforce transparency and public trust.*

Annex

Work Packages and Project Plan