

Document Sensitivity: Public

D6.1 - Project Plan

08/11/2024

Tony Allen

Work Package: WP6 - Project Management & Risks

Task Reference: T6.1 – Project Plan

© Commonwealth of Australia

Date: 08/11/2024 Doc. Version: 1

Page 1 of 52

Funded by



Australian Government

Department of Infrastructure, Transport,
Regional Development, Communications and the Arts

Project by





Document Control Information

Settings	Value	
Document Title:	D6.1 - Project Plan	
Work Package:	WP6 - Project Management & Risks	
Tasking Reference:	AATT/WP 6/ T 6.1 /A 6.1.1	
Document Author:	Tony Allen	
Work Package Lead:	Tina Henderson/Keith Robinson	
Task Leader:	Tony Allen	
Doc. Version:	1	
Sensitivity:	Public	
Date:	08/11/2024	

Document Approver(s) and Reviewer(s):

All Approvers are required. Records of each approver must be maintained. All reviewers in the list are considered required unless explicitly listed as Optional.

Name	Role	Action	Date
Tony Allen	Task Leader (always required)	Approved	07/11/2024
Tina Henderson	Work Package Leader (always required)	Reviewed	07/11/2024
Keith Robinson	Finance Director (only required if allocation of funding or expenditure is required)	Reviewed	07/11/2024
Danielle Bradbury	Risk Management (only required if new risks identified)	Reviewed	07/11/2024
Andrew Hammond	Deputy Project Director (optional)	Approved	07/11/2024
Tony Allen	Project Director (optional)	Approved	07/11/2024

Configuration Management:

The latest version of this controlled document is stored in AATT SharePoint WP 6 – Project Plans.
Document history:

Page 2 of 52 D6.1 - Project Plan



Document Sensitivity: Public

The Document Author is authorized to make the following types of changes to the document without requiring that the document be re-approved:

- Editorial, formatting, and spelling
- Clarification

To request a change to this document, contact the Document Author or Project Owner. Changes to this document are summarized in the following table in reverse chronological order (latest version first).

Revision	Date	Revision by	Short Description of Changes
	07/11/2024	Tony Allen	Content moved to AATT Template
	07/11/2024	Tony Allen	Reviewed

Table of Contents

D	ocument Control Information	2
	Table of Contents	3
P	oject Plan	5
	Introduction	5
	Project Operational Proposal	5
	Project Team	5
	Standards-Based Evaluation Plan	7
	Product Quality Model	8
	Statistical Validity	12
	Impartiality, Ethics and Legal Compliance	12
	Approach to Evaluation	13
	Independent Validation	14
	Stakeholder Consultation	15
	Engagement Events	15
	Calls for Participation	16
	Organisational Management of the Project	17
	Work Package 1: Data, Ethics and Impartiality	17
	Work Package 2: Context of Use, Evaluation Design & Validation	19
	Work Package 3: Call for Participation, Engagement & Communications	23
	Work Package 4: Evaluation Activity	27
	Work Package 5: Evaluation Reporting	34
	Work Package 6: Programme Management, Risks & Quality Control	
	Practical Deployment of Testing Activity	

Page 3 of 52 D6.1 - Project Plan



Document Sensitivity: Public

Preliminary Report Production	42
Final Report Production	43
Conclusion	43
Annex One – GANTT Chart	44
Annex Two – Monthly Schedule	45
Month Profile – November 2024 [M1]	45
Month Profile – December 2024 [M2]	46
Month Profile – January 2025 [M3]	47
Month Profile – February 2025 [M4]	48
Month Profile – March 2025 [M5]	49
Month Profile – April 2025 [M6]	50
Month Profile – May 2025 [M7]	51
Month Profile – June 2025 [M8]	52

Project Plan

Introduction

The Age Assurance Technology Trial (AATT) is an initiative led by the Australian Government to evaluate the effectiveness, reliability, and privacy impacts of various age assurance technologies. The trial is being set up in response to growing concerns about children's safety online and the need to protect minors from age-restricted content, such as gambling, social media and adult content. By testing a range of age assurance solutions—including age analysis, AI-based estimation, parental consent/control and identity document verification—the trial aims to assess the feasibility of these technologies in real-world applications, ensuring they are accurate, user-friendly and compliant with privacy laws.

The trial will explore how different methods perform in verifying a user's age without compromising their personal data, helping Australia establish best practices and potential regulatory frameworks for age assurance. This effort aligns with global movements towards safer digital environments for young users, as Australia seeks to balance technological advancement with robust data protection and ethical standards. Ultimately, the AATT will provide valuable insights for policy makers, businesses, and technology providers, guiding the future of age verification requirements in Australia.

Project Operational Proposal

ACCS, together with the principal project partners, have developed a comprehensive project plan for this trial utilising deep subject matter expertise. The Project Director, Tony Allen is the Editor of ISO/IEC 27566 – Age assurance system series of international standards; Iain Corby is the Editor of IEEE 2089.1 – Standard for Online Age Verification. ACCS is an existing accredited global conformity assessment body for ID and age assurance products, including holding accreditation under ISO/IEC 17065 and ISO/IEC 17021 (and shortly to add ISO/IEC 17025 as well).

This is a unique and highly specialised field. It is recognised that the deployment of generic testing approaches, such as biometric testing, face recognition testing or ID verification testing services, are inadequate to address the very specific use cases, privacy concerns, security concerns, acceptability concerns and functional performance of age assurance testing. This is an holistic project for Australia leading the world in building a thorough understanding of the effectiveness of age assurance as a practical tool for enhancing the protection of children online (and offline too).

Project Team

The Project Team comprises a wide range of skills drawn from the consortium, but led by ACCS. They include resources from:

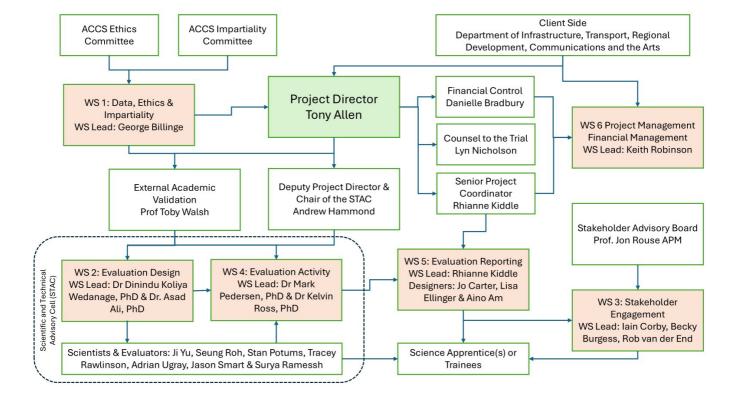
- AVID Certification Services Ltd (ACCS); Manchester, UK Company Number 14865982
- KJR (K.J Ross & Associates PTY LTD); ACT & NSW, AU ABN: 11 079 218 652

Page 5 of 52 D6.1 - Project Plan



- Holding Redlich (N A Ackroyd and Others); NSW, AU ABN: 15 364 527 724
- Koliya Group; NSW, AU ABN: 60 301 899 055
- Prof. Toby Walsh University of New South Wales; NSW, AU ABN: 20 392 053 118
- Heartburst PTY Ltd ATF the Heartburst Trust; VIC, AU ABN: 18 609 317 152
- Freelance Graphic Designers: Lisa Ellinger, AU; Aino Am, AU; Jo Carter, UK
- Solicab Limited (Manchester, UK) Company number: 14838279
- SafetyTech Limited (London, UK) Company number: 13143296
- Illuminate Tech Ltd (London, UK) Company number: 15269594

The Project Team Structure is as follows:



Page 6 of 52 D6.1 - Project Plan



Standards-Based Evaluation Plan

The Project will adopt a four-layer standards-based approach to evaluation:

Accreditation Layer

ISO/IEC 17065:2012

Conformity assessment — Requirements for bodies certifying products, processes and services

Evaluation Model Layer

ISO/IEC 25010:2023

Systems and software engineering — Systems and software Quality Requirements and Evaluation (SQuaRE) — Product quality model

Core Characteristics of Age Assurance Technologies Layer

ISO/IEC DIS 27566-1:2025

Information security, cybersecurity and privacy protection – Age assurance systems – Part 1: Framework
We will also apply Parts 2 & 3 as appropriate, but they remain in early stages of development

Implementation
Requirements and
Testing & Metrics
Layer

IEEE 2089.1:2024

Standard for Online Age Verification

ISO/IEC/IEEE 29119 series - Software testing

This approach is in accordance with Australia's <u>National Quality Infrastructure</u> established by the Department of Industry, Science and Resources. This layered approach gives businesses and consumers confidence in the goods and services they are developing, using or trading. Accreditation takes place in an international mutual recognition treaty through JAS-ANZ (for organisations, products and people) and NATA (for laboratories) in global partnership with UKAS. Beneath this layer, conformity assessment bodies, like ACCS, provide product certification, laboratory testing and management systems certification of products and services to international standards.

Australians can have confidence from this global process that, the evaluation reporting and modelling, developed in accordance with ISO/IEC 25040:2024 Systems and software engineering — Systems and software Quality Requirements and Evaluation (SQuaRE) — Quality evaluation framework will provide robust, repeatable and recognisable evaluation to international standards.

The product quality model is generic to any information technology system, but covers the key aspects of functional suitability, performance efficiency, compatibility, interaction capability, reliability, security, maintainability, flexibility and safety of the technology. It therefore offers a robust and appropriate generic framework upon which to build evaluation activity.

It is not sufficient by itself though, it needs to be augmented with the core characteristics of age assurance systems – as outlined in ISO/IEC DIS 27566-1 and the implementation requirements (such as the 5Rights Principles) and metrics layer – as outlined in IEEE 2089.1.

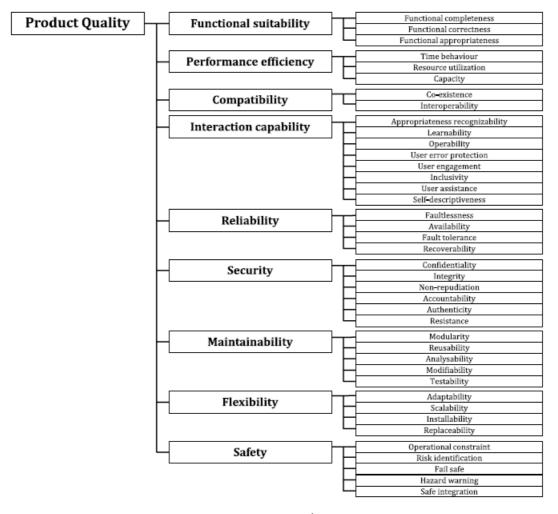
Page 7 of 52 D6.1 - Project Plan



The three documents, under the accreditation layer giving confidence in the impartiality, competence, credibility and management systems of the conformity assessment body, provide a comprehensive approach to the evaluation.

Product Quality Model

The Product Quality Model is set out in ISO/IEC 25010:



The core characteristics for evaluation are provided by ISO/IEC DIS 27566-1:2025 Age assurance systems – Part 1: Framework. This document is at draft international standard (DIS) stage, but is now relatively settled – the Project Director is the author of it. The Project Team will take account of any changes to it during the lifetime of the project.

Fundamental to this project is a deep understanding of the characteristics set out in ISO/IEC DIS 27566-1. It is an important global document, that sets out a framework and core characteristics for age assurance systems deployed for the purpose of enabling age-related eligibility decisions by anybody for any reason in any location through any type of relationship between an individual and the provider of any goods, content, services, venues or spaces that has policy requirements for acquiring assurance about the age or age range of persons (such as the supply of alcohol, tobacco, weapons or online content).

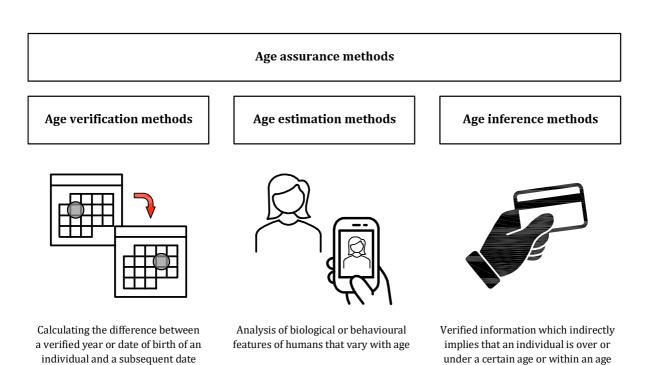
Page 8 of 52 D6.1 - Project Plan

range



Document Sensitivity: Public

Types of Age Assurance Methods:



ISO/IEC DIS 27566-1 covers:

- The terms and definitions, including those in the diagram above, that will be used throughout the project.
- An overview of the various methods of age assurance, including age verification, age estimation
 and age inference together with issues around successive validation of multi-channel approaches
 to age assurance.
- The functional characteristics of age assurance systems, including the roles of age assurance
 providers, intermediaries and relying parties, the data acquisition stages, sources of data, primary
 and secondary credentials, binding of the age assurance result to the correct individual,
 configuration management and context in use these all align to the product quality model shown
 above.
- The performance characteristics of age assurance systems, including the analysis of effective and
 ineffective systems, use of self-asserted age, indicators of confidence (see IEEE below too),
 classification accuracy, true/false positive/negative rates, outcome error parity (about bias),
 performance efficiency, resource utilisation and testability these all align to the product quality
 model shown above.
- The privacy characteristics of age assurance systems, including analysis of privacy by design and default, collection limitation, purpose limitation, access control, data disposal, avoidance of adding

Page 9 of 52 D6.1 - Project Plan



Document Sensitivity: Public

to the digital footprint, user awareness and audit logs – these all align to the 5Rights Principles and the data and privacy regulations in Australia as overseen by OAIC.

- The security characteristics of age assurance systems, including security by design and default, freshness, reuse and forwarding of age assurance results, preparation for attack, attack vectors, biometric presentation attack, spoofing attack, contraindicators and requirements for systems to fail safe these all align to the ASD Information Security Manual.
- The acceptability characteristics of age assurance systems, including inclusivity, user engagement, assistance and complaint handling these all align to consumer protection, human rights and anti-discrimination laws in Australia.

However, notwithstanding the comprehensive framework for age assurance provided by the ISO/IEC 27566 series, The Project Team recognise there are additional issues that are out-of-scope for ISO/IEC 27566, but in scope for this tender, so these have been augmented with the following:

- The evaluation of parental consent processes: This refers to a system where a child requests permission from a parent, guardian, or legally responsible adult to access age-restricted goods, services, content, venues, or spaces. This typically happens during the onboarding process of an app or service, where the parent is prompted to approve the child's request.
- The evaluation of parental control processes: This process allows parents, guardians, or legally responsible adults to pre-approve and manage a child's access to certain content or services. These controls are often implemented through device settings or family control systems on connectivity routers, devices or platforms, giving parents the ability to monitor and restrict access in advance.
- The evaluation of the efficacy of consent mechanisms, binding of children to the correct parent/guardian (verification), evolving capability of children to consent and age appropriate design.
- The evaluation of the effectiveness of third-party control mechanisms to filter age in-appropriate content without over filtering news, health, educational and support resources (such as substance abuse, suicide prevention, pregnancy advisory, body dysmorphia support services or sexuality/gender advisory services) this task is not about testing individual site age gates. It is important to understand the evolving capacity of children, issues of coercive control or abuse and age appropriate design in accordance with the 5Rights principles and the four C's content, contact, conduct and commerce developed by the Children Online: Research and Evidence (CO:RE) project, which was funded by the European Commission.
- Exploring the deployment of age assurance techniques at different levels of the technology stack
 including front-end and back-end deployments. This will include on device, on platform, on server,
 on router, in app store, in app, in user experience or in onboarding/checkout experiences for
 different age restricted goods, content, services, venues or spaces. As an example, the project will
 explore interoperability of tokenised memorisation of age assurance results, such as through the
 euCONSENT AgeAware solution.

Page 10 of 52 D6.1 - Project Plan

Document Sensitivity: Public

- A market-wide technology readiness assessment similar to the State-of-the-Art analysis undertaken
 for Ofcom and ICO as a part of the measurement of age assurance technologies by ACCS. This
 involves understanding technical maturity, scalability, market choice, availability and collective
 understanding of performance characteristics across all providers.
- A technology readiness assessment of individual trial participants for their deployments of age
 assurance methods. This needs to be conducted on each individual method that they make
 available for implementation by relying parties; on the use of successive validation if they use that;
 on the deployment within different layers of the technology stack; and through the creation and/or
 acceptance of tokenised age assurance results in an interoperable market. Technology readiness
 assessments will be conducted in accordance with the DoD recognised TRL 1-9 basis using objective
 evidence of readiness.
- This task involves examination of potential implementation factors for age assurance technologies in the Australian context. This will include analysis from the consumer and user research conducted by the Department. The task covers consideration of societal, technical and ethical aspects, including Australian Legislation, the Trusted Digital Identity Framework and user acceptability. The results of analysis of usability, inclusiveness and absence of unintended consequences (such as over-filtering or failing to address the evolving capacities of children to make their own choices).
- Exploring cultural sensitivity and understanding how age assurance technologies affect cultural
 norms and practices in Australia, particularly with Aboriginal and Torres Strait Islander peoples and
 multi-ethnic diverse communities. This will explore the social impacts including the societal
 implications of widespread age assurance, including the impact on user anonymity, freedom of
 speech, and access to information.

The approach to evaluation then needs to explore the deployment and implementation factors for age assurance, in particular exploring the categorisation (i.e. the indicators of confidence), assurance (i.e. certification) and interoperability (both vertically in a supply chain and horizontally across the market place).

The phases of selection of age assurance measures in the context of age appropriate design of online systems are set out in IEEE 2089.1:2024 as follows:

Determination Selection Assurance Categorisation	
Privacy	\supset
Data Security	\supset
Interoperability	\supset

Page 11 of 52 D6.1 - Project Plan



This will result in an analysis of the performance effectiveness of various age assurance measures against the metrics also set out in IEEE 2089.1:

Level of confidence	Liveness max false acceptance (failure to acquire)	False positive max (to declared limits)	False negative max (to declared limits)	Upper and lower limits to measure	Accuracy within upper and lower limits	Absolute Limit to measure	Accuracy outside absolute limits	Outcome error parity max
Strict	1%	1%	10%	± 1 years	95%	±2 years	<99.95%	1%
Enhanced	1%	1%	10%	± 1 years	95%	±2 years	<99.9%	1%
Standard	1%	3%	10%	±2 years	95%	±4 years	< 99%	1%
Basic	1%	5%	10%	±3 years	95%	± 6 years	< 90%	2%

NOTE 1—liveness false acceptance rate: The proportion of unauthorized users (i.e., not a genuine, live human being) incorrectly accepted as being live. This only applies to methods of age assurance where there is a risk that a human has been replaced by a fake alternative e.g., facial age estimation.

NOTE 2—**false negative**: An erroneous rejection of the hypothesis that a statistically significant event has been observed. This is also referred to as a type 2 error.

NOTE 3—false positive: An erroneous acceptance of the hypothesis that a statistically significant event has been observed. This is also referred to as a type 1 error.

NOTE 4—outcome error parity protected groups receiving an equal proportion of positive outcomes, or an equal proportion of errors.

Statistical Validity

Statistical validity is principally based around the number of trial participants that you need to have confidence in the evaluation results, like the classification accuracy measures (false accept rate, false reject rate, failure to acquire rate), binding accuracy (age assurance output relates to the correct individual), outcome error parity (freedom from bias).

The level of statistical validity the project will adopt, taking the 26m population of Australia and applying a generally accepted in research methodology confidence interval of 95% (giving a Z score of 1.96), and a proposed margin of error of 0.03; leads to a sample size of 1067+ for analysis.

The Project Team will apply this to population wide analysis, but apply a wider margin of error of 0.05 to specific population sub-categories (making the sample size 384+).

<u>NOTE</u>: The confidence interval and margin of error is not the same thing as the classification accuracy of the system under test, it is about the reliability of the statistical sampling of that system under test and the results provided.

Impartiality, Ethics and Legal Compliance

ACCS are an existing accredited conformity assessment body under ISO/IEC 17065. This means there is an mechanism for safeguarding impartiality, which is achieved through their independent impartiality panel. This will include the creation of a conflict of interest declaration and register which will be applicable throughout the project.

The project will be guided by an Ethics Handbook and overseen by an Ethics Sub-Committee, led by <u>George</u> <u>Billinge</u>, a former Senior Policy Officer on Age Assurance for UK Online Safety Regulator, OFCOM,

Page 12 of 52 D6.1 - Project Plan



supported by Lyn Nicholson from <u>Holding Redlich</u> acting as Counsel to the Trial Project. This is critically important for a project that involves the collection of biometric data and data about under 18's and working with human test subjects. This task includes liaison with the Office of the Australian Information Commissioner (OAIC) and the application of safeguarding of children policies in the AU context. These are existing ACCS policies that need to be applied and adapted to the specifics of the technology trial.

This ethical approach will include analysis and extent of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities in the demographic spread of human test subjects including through the application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research. Working with KJR's Cultural Advisor, Johnny Fejo, the project will include initial and ongoing Equality, Diversity and Inclusion Monitoring to identify where any aspects of the project have EDI consequences and put in place appropriate measures and controls to address them.

The Project Team respectfully acknowledge the Traditional Custodians of the lands and water in Australia where the trial will be conducted and the team pay respects to Ancestors and Elders past, present and emerging and are proud to support their communities through their inclusion and careful consideration throughout the design, implementation, communication and reporting of the trial.

Approach to Evaluation

The development of the approach to evaluation will be led by a Scientific and Technical Advisory Cell (STAC) chaired by Deputy Project Director, Andrew Hammond and four eminent specialist scientists:

- Dr Dinindu Koliya Wedanage, PhD, a Data Scientist at the University of Wollongong
- Dr Asad Ali, PhD, Principal Technologist on Age Assurance
- Dr Mark Pedersen, PhD, a Principal Technology Consultant at KJR
- Dr Kelvin Ross, PhD, FACS, a Principal Technology Consultant at KJR

The integration of the specific characteristics of age assurance to the evaluation methodology will be overseen by subject matter expert, Tony Allen and supported by ACCS lead data scientist, Surya Ramessh.

The development of the test protocols, biometric and test subject data capture, sampling and statistical analysis and ensuring the research is robust, repeatable, reproducible and statistically sound, will be supported by a team of product quality and software evaluation engineers from KJR all undertaken in Australia, including:

- Ji Yu (leading on age verification)
- Seung Roh (leading on age estimation)
- <u>Stan Potums</u> (leading on age inference)
- Tracey Rawlinson (leading on parental consent/control)
- Adrian Ugray (leading on the technology stack)
- Jason Smart (leading on technology readiness assessment)

Page 13 of 52 D6.1 - Project Plan

Document Sensitivity: Public

The Project Team will apply the ISO/IEC 29119 series of international standards on the development of software testing protocols to the project's approach. The selection of test models, test strategy and test assets is a critical part of the evaluation design process. The KJR test engineers are specialists in this design process, all to be carried out under the auspices of ACCS's existing ISO/IEC 17065 accreditation.

There are a wide range of available test tools and protocols presented in a table here. This figure from ISO/IEC 29119-1:2022 describes possible test approach choices:

Levels of testing

Unit testing Integration testing System testing System integration testing Acceptance testing

- User acceptance testing
- Operational acceptance testing
- Factory acceptance testing
- Alpha testing
- Beta testing
- Production verification testing

Test practices

Model-based testing
Scripted testing
Exploratory testing
Experience-based testing
Manual testing
A/B testing
Back-to-back testing
Mathematical-based testing
Fuzz testing
Keyword-driven testing
Automated testing
— Capture-replay driven

Data-driven

Static testing

Reviews (ISO/IEC 20246) Static analysis Model verification

Types of testing

Functional testing
Accessibility testing
Compatibility testing
Conversion testing
Disaster/recovery testing
Installability testing
Interoperability testing
Localization testing
Maintainability testing
Performance-related
testing

- Performance
- Load
- Stress
- Capacity
- Recovery
 Portability testing
 Procedure testing
 Reliability testing
 Security testing

Usability testing

Test design techniques / measures

Specification-based:

- Equivalence partitioning
- Classification tree method
- Boundary value analysis
- Syntax testing
- Combinatorial testing
 - All combinations
 - Pairwise
 - Each choice
 - Base choice
- Decision table testing
- Cause-effect graphing
- State transition testing
- Scenario testing
- Use case testing
- Random testing
- Metamorphic testing
- Requirements-based testing

Structure-based:

- Statement testing
- Branch testing
- Decision testing
- Branch condition testing
- Branch condition combination testing
- MC/DC testing
- Data flow testing
 - All-definitions testing
 - All-C-uses testing
 - All-P-uses testing
 - All-uses testing
 - All-DU-paths testing

Experience-based:

Error guessing

Independent Validation

It is critically important for the overall quality of the project, to ensure that the results are accepted, robust, recognised and capable of supporting the Department in their ongoing policy development. In order to achieve this the approach to evaluation will be independently validated. The Project will invite eminent Professor Toby Walsh FAA FAAAI FAAAS FACM FEURAI FRSN, who is a Laureate Fellow, Scientia

Page 14 of 52 D6.1 - Project Plan



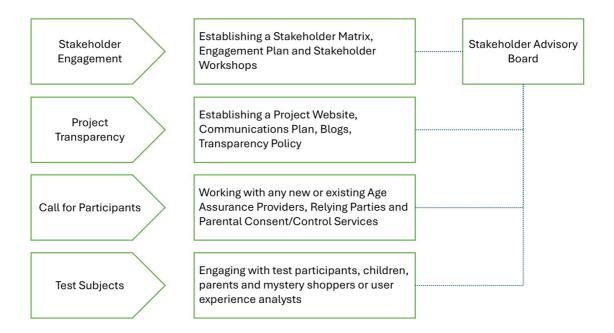
Professor of AI and Chief Scientist at the University of New South Wales's AI Institute to independently validate the project evaluation plan and project report.

Stakeholder Consultation

The Project Team recognise the significant importance of stakeholder engagement, participation and consultation throughout the project. On this aspect of the project, industry engagement specialist, <u>lain</u> <u>Corby</u> and the project team, including <u>Becky Burgess</u>, <u>Rhianne Kiddle</u>, <u>George Billinge</u> and others.

The Project's engagement activity will be supported by a Project Advisory Board, chaired by <u>Jon Rouse</u> APM, Professor AiLECS Labs at Monash University. This advisory board will not be part of the evaluation activity, but will advise the Project Team on effective stakeholder engagement and communication of the project and its outcomes.

The project stakeholder and communications plan can be summarised as follows:



The project will also include governmental, regulatory, third sector, representatives of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities, campaign organisations, age assurance service providers and relying parties.

In particular, the Project Team will ensure close stakeholder engagement with the eSafety Commissioner and the Office of the Australian Information Commissioner.

Engagement Events

The Project will include four engagement events for stakeholders.

1. Project Launch, Project Plan, Initial Engagement, Website, Openness & Transparency, Public Confidence and Trust – during November, 2024.

Page 15 of 52 D6.1 - Project Plan



- 2. Stakeholder Engagement, particularly trial participants, understanding the approaches to evaluation, setting expectations for effort for trial participants, timetable, explaining how to participate during January, 2025.
- 3. Preliminary Report, key initial outcomes from the trial outcomes, identification of opportunities for remedial evaluation during April, 2025.
- 4. Trial conclusion, final stakeholder event, report publication, project review and evaluation, stakeholder feedback during June, 2025.

Calls for Participation

The Project includes identifying, communicating with and gaining proactive engagement in the project from Age Assurance Providers and relevant Intermediaries (such as mobile network operators like Optus, Telstra and Vodafone), financial institutions (such as ANZ Bank, Commonwealth Bank, National Australia Bank, Westpac, etc.), credit agencies (such as Equifax, Experian and Illion) and other possible data intermediaries.

The project will also cover component service providers to age assurance (such as liveness detection, document authenticity detection, deepfake and video injection attack detection as examples).

ACCS clients (including those in Australia and Globally) and members of the Age Verification Providers Association (AVPA) may also be interested in participation in this project include (in no particular order):

- Yoti
- Blue Biometrics (AU based)
- IDVerse (AU based)
- Needemand
- Innovative Technology
- Datazoo (AU based)
- Verifymy
- AusPayPlus (AU based)
- GBG

The Project Team will be engaging with relying parties including social media companies, gaming, adult content, restricted goods, content, services, venues or spaces that use (or ought to use) age assurance results for making age-related eligibility decisions. The Advisory Board will include global representatives of these.

The Project will be engaging with the Australian Information Industry Association (AIIA), the Australian Computer Society (ACS), the Tech Council of Australia (TCA) and with international organisations such as the Digital Trust and Safety Partnership (DTSP) and the Tech Coalition.

Page 16 of 52 D6.1 - Project Plan



The provision of parental consent and parental control services in Australia includes engaging with organisations like the Alannah & Madeline Foundation, Bark, Qustodio, Parent Power Box; but also including global services like the Family Centre services provided by platforms (Google, Apple, etc) and social media (Meta, TikTok, Snap, etc).

The Project Team are particularly conscious of the risk that age assurance systems, particularly those reliant on biometric artificial intelligence may have been trained on globally diverse population sets where indigenous populations of Australia are under-represented. KJR's Cultural Advisor, Johnny Fejo, will make sure the project is always thinking and aware of the cultural sensitivities in all aspects of the trial, including outreach for trial participants.

The task will include engagement and participation with schools and educational establishments geographically spread.

Organisational Management of the Project

The Project will be managed through the PM² toolkit. The project is broken down into six work packages:

Work Package 1

Data Ethics and Impartiality

Work Package 2

Context of Use, Evaluation Design and Validation

Work Package 3

Call for Participation, Engagement and Communications

Work Package 4

Evaluation Activity

Work Package 5

Evaluation Reporting

Work Package 6

Programme Management, Risks and Quality Control

Work Package 1: Data, Ethics and Impartiality

Work Stream Leader: George Billinge

Work Package 1: Data, Ethics and Impartiality	Time period: M1-M7	5% of budget
associated with data, ethics and impartiality of the technology trial. It particularly covers the data collection, analysis and controls associated with children's data, including biometric data. It covers ethical considerations	Budget & Resources: WP Leader: George Billinge Illuminate Tech Counsel to the Project: Lyn Holding Redlich, Sydney Johnny Fejo, Cultural Advis	Nicholson,

Page 17 of 52 D6.1 - Project Plan



Document Sensitivity: Public

Australia. It secures impartiality (the presence of objectivity) through ACCS' existing ISO 17065 accreditation.	Ethics Specialists, Academics, Safeguarding Children Agency/Contact, Indigenous Population Representatives, ACCS Impartiality Panel
Tasks & Resources	Key Activities & Deliverables (in Bold):
T1.1 Project Data Protection, Ethics Handbook and Monitoring – This task involves the creation of an ethics sub-committee in the programme, together with a data collection plan and addressing critical ethical risks, such as the collection of biometric data and data about under 18's (see T1.2) and working with human test subjects (See T1.3). This task includes liaison with the Office of the Australian Information Commissioner (OAIC).	A-1.1.1 Creation of an Ethics Handbook [M1] A-1.1.2 Creation of a Data Protection Impact Assessment [M1] A-1.1.3 Creation of a Data Collection Ethical Protocol [M1] A-1.1.4 Data & Ethics Review on Collection [M4] D-1.1 Data & Ethics Assurance Report [M7]
T1.2 Safeguarding Children – This task involves the application of safeguarding children policies in the AU context. These are existing policies that need to be applied and adapted to the specifics of the technology trial.	A-1.2.1 Safeguarding Children Policy for the Technology Trial [M2] D-1.2 Safeguarding Children Assurance Report [M7]
T1.3 Working with Human Test Subjects – This task involves the application of data collection protocols from human test subjects. These are existing policies that need to be applied and adapted to the specifics of the technology trial. This task will include analysis and extent of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities in the demographic spread of human test subjects including through the application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research. The project will include initial and ongoing Equality, Diversity and Inclusion Monitoring to identify where any aspects of the project have EDI consequences	A-1.3.1 Human Test Subjects Protocol [M2] A-1.3.2 Application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research for Data Collection Phase [M3] A-1.3.3 Develop an ED&I Plan [M3] A-1.3.4 Undertake an ED&I Review [M8] to feed into the Performance Review & Project Evaluation (see T6.6)

Page 18 of 52 D6.1 - Project Plan



and put in place appropriate measures and controls to address them.	
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 declaration and register which will be applicable throughout the project.	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]

Work Package 2: Context of Use, Evaluation Design & Validation

Work Stream Leaders: Dr Dinindu Koliya Wedanage & Dr Asad Ali, PhD

Validation	Time period: M1-M2 22% of budget
Objective: This work package covers understanding the specific context in use of age assurance technology in the Australian context, including online safety, privacy and digital ID legislation, ASP security management and the specific programme requirements. It includes a literature review, research relevant to the evaluation of age assurance technologies from domestic and international sources. This work package covers the design and development of a standardised and replicable evaluation process using ISO/IEC 25040 – Systems and software quality requirements and evaluation; applying the five core characteristics identified in ISO/IEC DIS 27566 – Age assurance systems – Part 1: Framework and the specific indicators of confidence and measurement characteristics identified in IEEE 2089.1 – Online age checking systems and the Software Engineering test design methods in ISO/IEC 29119. All of this within existing ISO 17065 accreditation. This work package covers the validation and approval of the approach to evaluation.	Resources: WP Leaders: Dr Dinindu Koliya Wedanage, Data Engineer & Dr Asad Ali, Principal Technologist Independent Validation: Prof. Toby Walsh; University of New South Wales Al Institute Evaluation Designers, Dr Asad Ali, Illuminate Tech, Andrew Hammond, KJR, Dr Mark Pederson, KJR. Lead Evaluation Developers: Adrian Ugray Evaluation Engineer – Lead Technology Stack Jason Smart Evaluation Engineer – Lead TRA Ji Yu Jan Evaluation Engineer – Lead Age Verification

Page 19 of 52 D6.1 - Project Plan



Document Sensitivity: Public

Tasks & Resources	Key Activities & Deliverables (in Bold):
	Stack & Tech Readiness Assessors, Statistical Analysts, Data Scientists, AU Context Contacts, Third Sector, Agencies,
	Need: Standards access, Evaluation designers, ISO 25000 SQuaRE Evaluators, ISO/IEC 27566 / IEEE 2089.1 SMEs, Tech
	Surya Naraynan Evaluation Engineer – Lead Data Science
	Tracey Rawlinson Evaluation Engineer – Lead Parent Consent/Control
	Stan Potums Evaluation Engineer – Lead Age Inference
	Seung Rog Evaluation Engineer – Lead Age Estimation

T2.1 Understanding the National Context – Analysis of the existing understanding of age assurance technology in Australia, including consumer attitudes and literature review. Analysis of the input from responses to information requests under s.20 of the Online Safety (Basic Online Safety Expectations) Determination 2022 (Due in M2) (#RFT 3.1.7). Review of the inputs to the Roadmap for Age Verification and the background from the eSafety Commissioner through the Online Safety Act 2021.

A-2.1.1 Identification of Relevant Materials, Open Source Research and Specific Reports [M1]

D-2.1 Analysis of the Australian Context Report [M2]

T2.2 Understanding the Deployment Context in Australia –

Developing understanding of the context in use for Australia, to include the Privacy Act 1988, Digital ID Act 2024 (including accreditation rules and data standards), human rights and anti-discrimination legislation (particularly Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities) and the ASD Information Security Manual. This task needs to include engagement with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) on any additional factors or considerations for inclusion in the evaluation criteria. The research embraces the fact that Aboriginal and Torres Strait Islander

- A-2.2.1 Analysis of the relevant deployment contexts in Australia [M2]
- **A-2.2.2** Application of the ASD Information Security Manual to the project, including analysis of the accreditation and data standards from the AU Digital ID Framework.[M2]
- **A-2.2.3** Application of the research to the Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities. [M2]

Page 20 of 52 D6.1 - Project Plan



Document Sensitivity: Public

peoples and multi-ethnic diverse communities have existed continuously as distinct societies, with diverse and unique laws, cultures, knowledge and worldviews that can inform research across a wide range of disciplines including physical sciences, social sciences and humanities.

- **A-2.2.4** Engagement with DITRDCA on potential additional factors or considerations [M1]
- **T2.3 Evaluation Design (Systems & Software Engineering Quality Requirements and Evaluation)** Development of an evaluation structure in accordance with ISO/IEC 25040. The product quality model categorizes product quality properties into nine characteristics: functional suitability, performance efficiency, compatibility, interaction capability, reliability, security, maintainability, flexibility and safety. Each characteristic is composed of a set of related sub-characteristics. This methodology will incorporate accuracy, interoperability, reliability, ease of use, freedom from bias, protection of privacy, data security and human rights protections as contexts in use.
- **A-2.3.1** Analysis of relevant aspects and mapping of ISO/IEC 25010 [M1]
- **A-2.3.2** Building of an Evaluation Matrix in accordance with ISO/IEC 25040 [M2]

T2.4 Evaluation Design (Integration of ISO/IEC 27566 Core Characteristics and IEEE 2089.1 Evaluation Metrics) – Current development of ISO/IEC 27566-1 Core

Characteristics need to be mapped to an evaluation matrix (see T2.3). These characteristics (covering functionality, performance, privacy, security and acceptability) for age assurance systems. The consideration of performance metrics needs to be aligned with IEE 2089.1 Annex B, but it may be the case that some progress is made with ISO/IEC 27566-3 covering evaluation (it is suspected that this will not be sufficiently mature for this project). Having completed that analysis, it needs to be drawn together into the evaluation matrix (see T2.3). This also feeds in to the IEEE 2089.1 and ISO/IEC 27566-1 indicators of confidence – Asserted, Basic, Standards, Enhanced & Strict.

A-2.4.1 Analysis of ISO/IEC 27566-1 Core Characteristics to align to the ISO/IEC 25010 Product Quality Model [M1]

A-2.4.2 Analysis of IEEE 2089.1 Analysis Metrics (in Annex B) and alignment to the ISO/IEC 27566 Performance Characteristics and then feeding in to the ISO/IEC 25040 Evaluation Matrix. [M2]

T2.5 Evaluation Design (Biometric and Test Subject Data Capture) – The capture of biometric images (face, voice, hand modality), tokenised attribute exchange models (such as Age Aware by EUConsent), and age inference through non-governmental hard identifiers (like credits cards, open banking connect, etc.) together with the gathering of

ground-truth data for test subjects, built to a standardised

A-2.5.1 Analysis of age assurance methods including age verification, age estimation and age inference to develop a biometric and test subject data requirement for evaluation. [M2]

Page 21 of 52 D6.1 - Project Plan

Document Sensitivity: Public

metadata taxonomy for analytics is a critical part of the evaluation preparation. The test subject needs to consider biometric age estimation, account confirmation processes, email verification processes, parental consent, ageappropriate tokenised attribute exchange models and device or operating level interventions (seeT2.7).

- **A-2.5.2** Analysis of tokenised attribute exchange models available for evaluation. [M2]
- **A-2.5.3** Creation of metadata taxonomy for test data subjects. [M2]
- D-2.5 Creation of age assurance modality protocols and guides for all age assurance methods in scope. [M2]
- **T2.6 Evaluation Design (Technology Stack)** Evaluation of deployments and technology readiness assessment at the device, operating system, digital platform, application level and at the point of delivery/access. Technology deployment samples need to address different platforms, at device and IS level and at platform level (such as plugins to standard HTML platforms) and readiness in the Australian context.
- **A-2.6.1** Development of technology stack mapping with age assurance deployments [M3]
- **A-2.6.2** Identification of source deployments in relying parties and test protocols for context in use [M2]

T2.7 Evaluation Design (Sampling and Statistical

Assumptions/Limitations) – This task explores ensuring statistical significance of the evaluation activity. This is principally based around classification accuracy measures (false accept rate, false reject rate, failure to acquire rate), binding accuracy (age assurance output relates to the correct individual), outcome error parity (freedom from bias). Taking the 26m population of Australia and applying a generally accepted in research methodology confidence interval of 95% (giving a Z score of 1.96), and a proposed margin of error of 0.03; this leads to a sample size of 1067+. This would apply to population wide analysis, but apply a wider margin of error of 0.05 to specific population sub categories (making the sample size 384+). NOTE: The confidence interval and margin of error is not the same thing as the classification accuracy of the system under test, it is about the reliability of the statistical sampling of that system under test.

Specificity measures a test's ability to correctly identify true negatives, while sensitivity assesses its ability to correctly

- **A-2.7.1** Preparation of statistical theorem protocols, based on the requirements in IEEE 2089.1 Annex B and statistical best practice (in accordance with Australian Bureau of Statistics guidance). [M2]
- **A-2.7.2** Identification of all statistical measures to be deployed. [M2]
- **A-2.7.3** Identification of measurement uncertainty parameters and the requirements for sample sizes, confidence intervals, specificity and sensitivity. [M2]
- A-2.7.4 Development of approach to securing outcome error parity analysis. [M2]

Page 22 of 52 D6.1 - Project Plan



detect true positives, reflecting accuracy in identifying conditions or events. The evaluation design needs to take account of successive validation methods (waterfall approach) including permutations and combinations of multiple age assurance methods.	
T2.8 Evaluation Validation – This task is external to the core evaluation design team consisting initially of validation by internal subject matter experts, input from the Advisory	D-2.8 Prepare a report for external evaluation validation [M2]
Board (see T3.1) and then independent validation of the proposed approach by Chief Scientist, Prof. Toby Walsh, Laureate Fellow & Scientia Professor of AI the University of New South Wales AI Institute.	A-2.8.1 Undertake external evaluation validation [M2]
T2.9 Evaluation Approval – This task completes the evaluation design phase with approval from the DITRDCA. This approval will then authorise the commencement of the evaluation phase of the project.	D-2.9 Evaluation Proposal Report [M1] A-2.9.1 Evaluation Approval from DITRDCA [M2]
	MILESTONE 2: Completion of Trial Development (including approvals) [M2]

Work Package 3: Call for Participation, Engagement & Communications

Work Stream Leader: Iain Corby

Work Package 3: Call for Participation, Engagement & Communications	Time period: M1-M3 & M8 18% of budget
Objective: This work package is to attract participants in the technology trial. Participants are needed from (a) test subjects; (b) age assurance service providers (& potentially intermediaries depending on the deployment/technology stack); and (c) relying parties (particularly social media companies, providers of adult content and providers of age appropriate design implementations). The programme needs to be completed with transparency and ensuring the	Resources: WP Leader: Iain Corby, Director, Safety Tech Limited & Executive Director, Age Verification Providers Association Rob van der End, Heartburst Agency Venues, Arrangements, Management of Stakeholder Events (Ring Central, Hotels, etc). Graphic Design (see WP 5), Hosting,

Page 23 of 52 D6.1 - Project Plan



Document Sensitivity: Public

credibility and confidence of participants, the	Management. Blog Creation, Call for	
commissioning department and the Australian public.	Participation, Online Data Collection, Legal Advice (See WP 1), Mystery Shopping Companies.	
Tasks & Resources	Key Activities & Deliverables (in Bold):	
T3.1 Stakeholder Engagement – This task maintains stakeholder engagement, support and confidence in the project. The DITRDCA may nominate specific stakeholders, but the project will include governmental, regulatory, third sector, representatives of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities.,	D-3.1 Creation of a Stakeholder Matrix: [M1] A-3.1.1 Establish a Project Advisory Board [M1] and hold four Advisory Board	
campaign organisations, age assurance service providers and relying parties. Particular attention will be paid to eSafety Commissioner and 5Rights Foundation as stakeholders. This includes the establishment of a Project Stakeholder Advisory Board.	Meetings. A-3.1.2 Holding an initial project stakeholder engagement event to set out the project plan, approach and overall management of the project to launch the	
There will be at least four engagement events for stakeholders during the project.	calls for participation (see T3.3 – T3.5] [M1]	
#1 Project Launch, Project Plan, Initial Engagement, Website, Openness & Transparency, Public Confidence and Trust [M1]	A-3.1.3 Holding a pre-participation stakeholder event before the evaluation activity takes place and to report back on the evaluation plans (see T2.9) [M3]	
#2 Stakeholder Engagement, particularly trial participants, understanding the approaches to evaluation, setting expectations for effort for trial participants, timetable,	A-3.1.4 Holding a post preliminary report stakeholder event (see T5.3) [M6]	
explaining how to participate [M3] #3 Preliminary Report, key initial outcomes from the trial outcomes, identification of opportunities for remedial evaluation (see T4.9) [M6]	A-3.1.5 Final Report Stakeholder Event (see T5.4) [M8]	
#4 Trial conclusion, final stakeholder event, report publication, project review and evaluation (see T6.6), stakeholder feedback [M8].		
T3.2 Communications including Project Website – This task secures transparency and maintains public trust and confidence in the project. This includes the creation of a project team portal (within existing MS 365 Teams	A-3.2.1 Creation of a project website, blog, contact and repository for documentation [M1]	

Page 24 of 52 D6.1 - Project Plan

Tenancy), and an external website, including participant



Document Sensitivity: Public

data gathering capability (using WordPress templates and MS Forms). Reports on all deliverables (subject to any security concerns or restrictions from DITRDCA) would be available through the website to ensure openness and transparency in the project. This task also provides the data gathering capability, particularly for the collection of practice statements (ISO 27566, clause 11) and efficacy claims from age assurance providers (IEEE 2089.1 Annex B). This task also covers bug identification and reporting for online communications. Each task leader and the project team will be providing regular blog entries and materials for inclusion on the public website.

- **A-3.2.2** Maintaining publication of appropriate documentation through the website [M1 M8]
- **A-3.2.3** Creation of online facility for the calls for participation (see T3.3 3.5) [M2]
- **A-3.2.4** Creation of online forms and questionnaires for data and evidence gathering from participants [M3]
- **A-3.2.5** Creation of an online bug reporting mechanism [M4]
- T3.3 Call for Participation (Age Assurance Providers and Intermediaries) This task identifies, communicates with and gains the proactive engagement in the project from Age Assurance Providers and relevant Intermediaries (such as mobile network operators like Optus, Telstra and Vodafone), financial institutions (such as ANZ Bank, Commonwealth Bank, National Australia Bank, Westpac, etc.), credit agencies (such as Equifax, Experian and Illion) and other possible data intermediaries. It would also cover component service providers to age assurance (such as liveness detection, document authenticity detection, deepfake and video injection attack detection as examples). This would take into account advance expressions of interest to DITRDCA, but also existing ACCS clients (including those in Australia and Globally) and members of
- **A-3.3.1** Establishing contact with AVPA, age assurance providers in direct contact with DITRDCA and existing ACCS clients about the trial [M2]
- **A-3.3.2** Establishing the parameters and guidelines for age assurance provider participants [M3]
- **A-3.3.3** Issuing the call for participants to Age assurance providers and intermediaries [M4]

T3.4 Call for Participation (Relying Parties) – This task identifies, communicates with and gains the proactive engagement in the project from relying parties. These are organisations (such as social media companies, gaming, adult content, restricted goods, content, services, venues or spaces) that use (or ought to use) age assurance results for making age-related eligibility decisions. This task would include engagement with an liaison with organisations like the Australian Information Industry Association (AIIA), Australian Computer Society (ACS), Tech Council of

the Age Verification Providers Association (AVPA).

- A-3.4.1 Establishing contact with AIIA, ACS, TCA, DTSP, etc; relying parties in direct contact with DITRDCA and existing strategic contacts with relying parties already held by ACCS [M2]
- **A-3.4.2** Establishing the parameters and guidelines for relying party participants [M3]
- **A-3.4.3** Issuing the call for participants to relying parties particularly social media

Page 25 of 52 D6.1 - Project Plan



A-3.7.3 Establish a contract with an AU-

based mystery shopping provider [M3]

A-3.7.4 Establish a contract with a UX AT

provider [M3]

Document Sensitivity: Public

Australia (TCA) and international organisations like the Digital Trust and Safety Partnership (DTSP).	and online platforms for adult content [M4]
T3.5 Call for Participation (Parental Consent and Control Services) – This task identifies, communicates with and gains proactive engagement in the project from providers of parental consent and parental control services in Australia. This could include organisations like the Alannah & Madeline Foundation, Bark, Qustodio, Parent Power Box; but would also include global services like the Family Centre services provided by platforms (Google, Apple, etc) and social media (Meta, TikTok, Snap, etc)	A-3.5.1 Establishing contact with parental consent and control services available in AU and globally, including services in direct contact with DITRDCA [M2] A-3.5.2 Establishing the parameters and guidelines for parental consent and control services [M4] A-3.5.3 Issuing the call for participants for parental consent and control services [M5]
T3.6 Gathering Practice Statements – This task gathers existing and developed practice statements (ISO 27566, Clause 11) for age assurance providers, intermediaries and relying parties. Although existing ACCS certified age assurance providers will already have a practice statement, other participants may need to develop one, so the project includes an interactive online questionnaire/tool for establishing practice statements. The practice statements cover functionality, performance, privacy, security and acceptability parameters and configuration settings for the deployment of age assurance systems.	A-3.6.1 Creating an online portal for the collection of practice statements [M2] A-3.6.2 Briefing for participants on practice statements, including a training course on how to prepare them in accordance with ISO/IEC 27566 Clause 11 [M3] A-3.6.3 Open call for practice statements to be submitted [M4]
	D-3.6 Collation of practice statements for evaluation [M5]
T3.7 Call for Participation (Test Subjects, including Children) – This task identifies, engages with and gains the proactive participation of a sufficient number of test participants (see T 2.5) to meet the statistical requirements of the project (see T2.7). The recruitment process would include establishing the consent mechanisms (see T1.1) safeguarding children (see T1.3) and the ethical considerations (see T1.3). It would also include ensuring	A-3.7.1 Establishing the parameters and guidelines for human test subjects, including children [M3] A-3.7.2 Establishing the consent mechanisms, including where necessary, parental consent mechanisms for human test subjects (see T1.1) [M3]

Page 26 of 52 D6.1 - Project Plan

considerations (see T1.3). It would also include ensuring

statistically significant representation of Aboriginal and

Torres Strait Islander peoples and multi-ethnic diverse

communities. in testing and analysis.



This task will include working with members of the Mystery Shopping Providers Association (MSPA) in Australia. The procurement of these services would be locally in Australia through existing contacts, but based on competitive quotations.

The task will include engagement and participation with schools and educational establishments geographically spread.

- **A-3.7.5** Establishing the data collection requirements to match to ground truth metadata taxonomy (see T2.5) [M4]
- **A-3.7.6** Issuing the call for participants for human test subjects [M4]
- A-3.7.7 Outreach to schools and educational establishments to secure human test subject participation suggest six schools geographically spread across Australia for selection for participation [M4]
- **A-3.7.8** Establish links to representatives of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities to ensure that human test subjects are demographically representative for Australia [M4]

Work Package 4: Evaluation Activity

Work Stream Leaders: Dr Mark Pedersen & Dr Kelvin Ross

Work Package 4: Evaluation Activity	Time period: M3-M5	36% of budget
Objective: This work package covers the actual evaluation activity. It includes the practical deployment of the evaluation plans established under work package 2. It covers the deployment of mixed-method (i.e. both quantitative and qualitative research methodologies to examine the research problem). Throughout, research team oversight will include continuous ethical compliance (see T1.1), safeguarding compliance (see T1.2), impartiality compliance (see T1.3) and deployment in accordance with the approved evaluation approach (see T2.9). The evaluation activity is structured around the practical deployments of age assurance technologies in the real world with an option to create simulated test harnesses, where the level of technology readiness (TRL) does not	Resources: WP Leader: Dr Mark Peders Ross WP Support: Dr Asad Ali, Pr Technologist, Illuminate Te Dinindu Koliya Wedanage, Surya Ramessh, Lead Scient Certification Scheme Lead Evaluators: Adrian Ugray Evaluation E Technology Stack	rincipal ch Ltd; Dr Data Engineer, tist, Age Check

Page 27 of 52 D6.1 - Project Plan





support real world deployment. It will be delivered through weekly STAC Meetings forming the core of the project's scientific approach. Finally, this work package includes any remedial evaluation following initial analysis of results or feedback from the preliminary report (see T5.3).

Jason Smart Evaluation Engineer – Lead TRA

Ji Yu Jan Evaluation Engineer – Lead Age Verification

Seung Rog Evaluation Engineer – Lead Age Estimation

Stan Potums Evaluation Engineer – Lead Age Inference

Tracey Rawlinson Evaluation Engineer – Lead Parent Consent/Control

Surya Naraynan Evaluation Engineer – Lead Data Science

Tasks & Resources

T4.1 Evaluation of age verification technologies – This task covers the deployment of age verification technologies that validate data, information, documents or materials to establish a date or year of birth and compute that with a subsequent date to provide an age assurance result indicating that a person is over/under an age threshold. This task will include the efficacy, accuracy, privacy, security and acceptability characteristics associated with those (see ISO 27566 and IEEE 2089.1). The evaluation will include binding effectiveness and susceptibility to presentation attack vectors of age verification technologies. These will take into account biometric presentation attacks for selfie matching (see ISO 19795). Evaluations will be conducted in line with the product quality model set out in ISO 25010 and the approach to evaluation in ISO 25040. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for age verification technologies, including identity challenged demographics (see T4.8)

Key Activities & Deliverables (in Bold):

- **A-4.1.1** Analysis of practice statements (see T3.6) of age verification technologies [M4]
- **A-4.1.2** Deployment of approved evaluation methodologies for age verification technologies (see T2.9) [M3]
- **A-4.1.3** Comparative quantitative statistical analysis of the efficacy age verification technologies [M4]
- A-4.1.4 Comparative quantitative statistical analysis of binding effectiveness and susceptibility to presentation attack vectors of age verification technologies.
 [M4]
- **A-4.1.5** Comparative technology readiness assessment of age verification technologies for inclusion in T4.7 [M5]
- **A-4.1.6** Qualitative analysis of implementation factors associated with age verification technologies. [M5]

Page 28 of 52 D6.1 - Project Plan



Document Sensitivity: Public

T4.2 Evaluation of age estimation technologies – This task covers the deployment of age estimation technologies that undertake analysis of biological or behavioural features of humans that vary with age to provide an age assurance result indicating that a person is over/under an age threshold. These systems sometimes employ machine learning and artificial intelligence and may be subject to configuration settings or age buffers to avoid false positives based on inherent performance errors. This task will include the efficacy, accuracy, privacy, security and acceptability characteristics (see ISO 27566 and IEEE 2089.1). This also includes a more statistical analytical approach, such as establishing the mean absolute errors, standard deviation and outcome error parity of age estimation approaches. The evaluation will include UX workflow binding effectiveness (i.e. can you simply switch the user within the workflow), binding effectiveness, susceptibility to presentation attack and examination of the impact of ambient lighting on the efficacy of the system (something that is a known factor in face skin tone bias as an example). Evaluations will be conducted in line with the product quality model set out in ISO 25010 (applying the statistical measurement methodologies set out in ISO 10576). A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for age verification technologies including outcome error parity for humans with protected characteristics in equality legislation (see T4.8)

- **A-4.2.1** Analysis of practice statements (see T3.6) of age estimation technologies [M4]
- **A-4.2.2** Deployment of approved evaluation methodologies for age estimation technologies (see T2.9) [M3]
- **A-4.2.3** Comparative quantitative statistical analysis of the efficacy age estimation technologies [M4]
- A-4.2.4 Comparative quantitative statistical analysis of binding effectiveness and susceptibility to presentation attack vectors and ambient lighting of age estimation technologies. [M4]
- **A-4.2.5** Comparative technology readiness assessment of age estimation technologies for inclusion in T4.7 [M5]
- **A-4.2.6** Comparative analysis of outcome error parity of age estimation technologies for humans with protected characteristics. [M5]
- **A-4.2.7** Qualitative analysis of implementation factors associated with age verification technologies. [M5]
- **T4.3 Evaluation of age inference technologies** This task covers the deployment of age inference technologies that validate the existence of facts or data about an individual that can result in their age or age range being inferred. These systems rely on the status of facts (such as the holder of a credit card) being in law required to be a certain age. This task will include the assessment of the reliability of inference facts from the technologies deployed they can include for instance presence of registers of electors, holders of certain licences or permissions, military or public service, marital records and many other possibilities. This
- **A-4.3.1** Analysis of practice statements (see T3.6) of age inference technologies [M4]
- **A-4.3.2** Deployment of approved evaluation methodologies for age inference technologies (see T2.9) [M3]
- **A-4.3.3** Comparative qualitative analysis of the validity of inference methods based on differing cultural, regulatory or accuracy characteristics. [M4]

Page 29 of 52 D6.1 - Project Plan

Document Sensitivity: Public

task will include the efficacy, accuracy, privacy, security and acceptability characteristics (see ISO 27566). The evaluation will include binding effectiveness and susceptibility of false record injection attack. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for age inference technologies including the validity of inference based on differing cultural, regulatory or accuracy status of data in different states or territories and communities (see T4.8)

- **A-4.3.4** Comparative quantitative statistical analysis of binding effectiveness and susceptibility to false record injection attack vectors. [M4]
- **A-4.3.5** Comparative technology readiness assessment of age inference technologies for inclusion in T4.7 [M5]
- **A-4.3.6** Qualitative analysis of implementation factors associated with age inference technologies. [M5]

T4.4 Evaluation of successive validation (waterfall method) approaches - This task covers age assurance providers and relying parties that provide multiple and successive approaches to age assurance, usually starting with an age assertion method and then supplemented by successive age assurance methods until the requisite level of confidence in the age of the individual is established. These systems can rely on cumulative assurance, but usually rely on gradually more privacy invasive approaches to gain assurance. This task will include the efficacy, accuracy, privacy, security and acceptability characteristics (see ISO 27566). The evaluation will include analysis and understanding of the practice statements of relying parties deploying successive validation, particularly where they are utilising multiple age assurance provider inputs and/or orchestration service providers. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for successive validation (see T4.8).

- **A-4.4.1** Analysis of practice statements (see T3.6) of relying parties and age assurance providers that are deploying successive validation techniques [M4]
- **A-4.4.2** Deployment of approved evaluation methodologies for successive validation techniques (see T2.9) [M3]
- A-4.4.3 Comparative qualitative analysis of the validity of successive validation, particular where relying parties are utilizing multiple age assurance providers and/or orchestration service providers.
 [M5]
- **A-4.4.4** Comparative technology readiness assessment of successive validation techniques for inclusion in T4.7 [M5]
- **A-4.4.5** Qualitative analysis of implementation factors associated with successive validation techniques. [M5]

T4.5 Evaluation of parental consent or control mechanisms

 This task involves the deployment of parental consent (i.e. processes whereby a child prompts a parent, guardian or legally responsible adult to grant consent and approval **A-4.5.1** Analysis of practice statements (see T3.6) of relying parties that are deploying parental consent or control techniques [M4]

Page 30 of 52 D6.1 - Project Plan

Document Sensitivity: Public

usually on app or service in the onboarding user experience when accessing age restricted goods, services, content, venues or spaces) or parental control (i.e. processes whereby a parent, guardian, etc establishes advance approval and control over access, which are often deployed through on device or on connectivity router family control systems). The task includes the efficacy of consent mechanisms, binding of children to the correct parent/guardian (verification), evolving capability of children to consent and age appropriate design. The task also includes effectiveness of third-party control mechanisms to filter age in-appropriate content without over filtering news, health, educational and support resources (such as substance abuse, suicide prevention, pregnancy advisory, body dysmorphia support services or sexuality/gender advisory services) – this task is not about testing individual site age gates. This will also include addressing the evolving capacity of children, issues of coercive control or abuse and age appropriate design in accordance with the 5Rights principles and the four C's content, contact, conduct and commerce developed by the Children Online: Research and Evidence (CO:RE) project, which was funded by the European Commission. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for parental consent and control mechanisms (see T4.8).

- A-4.5.2 Deployment of approved evaluation methodologies for parental consent techniques including efficacy, binding, evolving capacity and age appropriate design to 5Rights principles (see T2.9) [M3]
- A-4.5.3 Deployment of approved evaluation methodologies for parental control techniques including efficacy, filter effectiveness, evolving capacity, susceptibility to coercive control and abuse and age appropriate design to 5Rights principles (see T2.9) [M3]
- **A-4.5.4** Comparative qualitative analysis of the validity of parental consent or control methodologies. [M5]
- **A-4.5.5** Comparative analysis of the validity of parental control techniques at different levels of the technology stack (see T4.6)
- **A-4.5.6** Comparative technology readiness assessment of successive validation techniques for inclusion in T4.7 [M5]
- **A-4.5.7** Qualitative analysis of implementation factors associated with successive validation techniques. [M5]
- **T4.6 Evaluation of technology stack deployments** This task explores the deployment of age assurance techniques at different levels of the technology stack including frontend and back-end deployments. This could include on device, on platform, on server, on router, in app store, in app, in user experience or in onboarding/checkout experiences for different age restricted goods, content, services, venues or spaces. This task will also explore interoperability of tokenised memorisation of age assurance results, such as through the euCONSENT Age
- **A-4.6.1** Analysis of practice statements (see T3.6) of relying parties that are advocating for are relying upon technology stack deployments outside of their own control (i.e. on device, on router, in app store etc) [M4]
- **A-4.6.2** Analysis of practice statements (see T3.6) of relying parties that are developing their own technology stack deployments (i.e. in app, in user

Page 31 of 52 D6.1 - Project Plan



Aware solution. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for technology stack deployments (see T4.8).

This task involves identification and analysis of practice statements of relying parties that are either reliant upon the deployments in tech stacks outside of their control (such as on device, on router or in app store) and those that are inside their control (such as in app, in user experience, in onboarding/checkout or on platform. The qualitative analysis will be dependent upon the effectiveness of different age assurance methods at different levels of the tech stack, including the binding effectiveness to the individual user. The analysis of tech stack deployments also needs to take account of the use of devices in multiple locations (through different local connectivity) and through multiple networks, including the potential use of virtual private networks to evade tech stack controls.

Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for parental consent and control mechanisms (see T4.8).

T4.7 Evaluation of technology readiness – This task involves a structured approach to technology readiness of age assurance technologies. This will be undertaken at two levels.

Firstly the market-wide technology readiness assessment similar to the State-of-the-Art analysis undertaken for Ofcom and ICO as a part of the measurement of age assurance technologies undertaken by ACCS. This involves understanding technical maturity, scalability, market choice, availability and collective understanding of performance characteristics across all providers.

experience, in onboarding/checkout, on platform, etc) [M4]

A-4.6.3 Analysis of reusable tokenised age assurance across multiple relying parties and tech stack deployments [M5]

A-4.6.4 Deployment of approved evaluation methodologies for analysis of technology stack deployments of age assurance techniques. [M4]

A-4.6.5 Comparative qualitative analysis of the validity of various technology stack deployments. [M5]

A-4.6.6 Comparative technology readiness assessment of technology stack deployments for inclusion in T4.7 [M5]

A-4.6.7 Qualitative analysis of implementation factors associated with technology stack deployments. [M5]

A-4.7.1 Collation of technology readiness assessments from other evaluations [M5]

A-4.7.2 Production of a market wide technology readiness analysis covering market choice, availability and performance characteristics of different age assurance deployment at different levels of the technology stack [M5]

A-4.7.3 Production of individual technology readiness assessments for each participant age assurance, parental consent, parental control or technology

Page 32 of 52 D6.1 - Project Plan



Document Sensitivity: Public

Secondly the technology readiness assessment of individual trial participants for their deployments of age assurance methods. This needs to be conducted on each individual method that they make available for implementation by relying parties; on the use of successive validation if they use that; on the deployment within different layers of the technology stack; and through the creation and/or acceptance of tokenised age assurance results in an interoperable market.

stack provider participant in the trial based on a pro-forma to DoD TRL analysis [M6]

Technology readiness assessments will be conducted in accordance with the DoD recognised TRL 1-9 basis using objective evidence of readiness.

T4.8 Evaluation of implementation factors – This task involves examination of potential implementation factors for age assurance technologies in the Australian context. This will include analysis from the consumer and user research conducted by DITRDCA (see T2.1). The task covers consideration of societal, technical and ethical aspects, including Australian Legislation, the Trusted Digital Identity Framework and user acceptability. The results of analysis of usability, inclusiveness and absence of unintended consequences (such as over-filtering or failing to address the evolving capacities of children to make their own choices).

The task will also explore cultural sensitivity and understanding how age assurance technologies affect cultural norms and practices in Australia, particularly with Aboriginal and Torres Strait Islander peoples and multiethnic diverse communities or other culturally diverse communities and social impacts including the societal implications of widespread age assurance, including the impact on user anonymity, freedom of speech, and access to information.

The task will also explore economic and cost implications providing an overview of the competitive cost profiles of providers (whilst also protecting market sensitive data and fostering effective competition).

A-4.8.1 Collation of implementation factors identified from other evaluations [M5]

A-4.8.2 Production of an analysis of implementation factors in the Australian Context. [M6]

A-4.8.3 Production of a market economic analysis of the cost profiles of providers (whilst protecting market sensitive data and fostering effective competition) [M6]

Page 33 of 52 D6.1 - Project Plan



14% of budget

T4.9 Remedial Evaluation – This task recognises that despite clear evaluation planning (See Workstream 2), Stakeholder Engagement (See Workstream 3) and a structured approach to evaluation deployment (See Workstream 4), it is likely that some matters will arise during analysis and after production of preliminary results. Therefore, within reasonable expectations, this task covers the remedial evaluation or additional evaluations required to address any shortcomings identified.

A-4.9.1 Complete remedial evaluations [M5 & M7]

Work Package 5: Evaluation Reporting

Work Stream Leader: Rhianne Kiddle

Work Package 5: Evaluation Reporting

Objective: This work package covers the evaluation		
reporting process. It includes gathering research		
methodology and validation (see T2.8), literature review		
(see T2.1) and explaining the evaluation context (see T2.2).		
This involves creation of an Editorial Board, who will meet		
regularly as the project moves towards publication of the		
report. There are two phases of reporting: a preliminary		
report [M6] and a final report [M8]. The task involves		
considerable effort to make the report:		

- (a) Scientifically robust and resistant to external scrutiny (by academics, statisticians, parliamentarians, stakeholders and trial participants), and
- (b) Understandable to different audiences (by providing executive summaries, simple explainers, detailed analysis and statistical tables, charts, diagrams and graphics).

It is intended that the report will be published in accordance with guidelines issued by the Australian Bureau of Statistics and fit for public Senate Scrutiny.

Resources:

Time period: M5-M8

WP Leader: Rhianne Kiddle, Project
Specialist, Project Consultant

Dr Mark Pederson, KJR, Dr Kelvin Ross, KJR

Dr Dinindu Koliya Wedanage, Data Engineer, Dr Asad Ali, PhD, Surya Ramessh, Data Scientist

Lisa Ellinger, Data Visualisation; Aino Am, Graphic Design, Jo Carter, SoJo Creative; Creative Design

Independent Validation: Prof. Toby Walsh; University of New South Wales AI Institute

Copywriting, editorial, material gathering, photography, publication (ISBN), Technical drawings, flowcharts, analysis, statistical representations, Power BI, etc.

Peer review

ACCS Impartiality Panel

Review as necessary by Australian Bureau of Statistics

Page 34 of 52 D6.1 - Project Plan



Document Sensitivity: Public

	Legal Deposit
Tasks & Resources	Key Activities & Deliverables (in Bold):
T5.1 Data Gathering – This task involves gathering of all of the data, reports, analysis and evaluations of the individual tasks and deliverables within the workstreams. It also involves working with graphic designers, copywriters, editorial, photography and data scientists to provide for engaging and understandable content. The task includes peer review by Chief Scientist, Prof. Toby Walsh, Laureate Fellow & Scientia Professor of AI the University of New South Wales AI Institute.	A-5.1.1 Creation of a report structure, skeleton and graphic design style, colour scheme, palette and design themes — aligned to the website design (see T3.2). [M4] A-5.1.2 Collation of outputs from all workstreams and evaluations [M5] A-5.1.3 Creation of graphic assets, data tables and report contents [M5] D-5.1 Peer review by the University of New South Wales Al Institute [M6]
T5.2 Alignment of Data to indicators of confidence – This task involves analysis of the results against the indicators of confidence in ISO 27566 and IEEE 2089.1. This is part of the scoring process and potentially being able to categorise age assurance technologies as meeting basic, standard, enhanced or strict indicators of confidence. The graphic representation of this in final reports will be crucial to aid understanding of the relative merits of the technologies and approaches examined during the trial.	A-5.2.1 Reporting on analysis of evaluation results against the indicators of confidence in ISO 27566 and IEEE 2089.1 [M5]
T5.3 Preliminary Report – This task involves the production of a preliminary report, including identifying any remedial evaluations required, gathering stakeholder feedback on the preliminary report and appropriate pre-publication quality control on the report (including proof reading, sense checking and accuracy validation). This task also involves ensuring that the DITRDCA and statutory agencies in Australia have effective pre-	A-5.3.1 Implementing content into the preliminary report skeleton (see T5.1) [M5] A-5.3.2 Pre-publication stakeholder reviews of the preliminary report starting with DITRDCA, then engaging with statutory stakeholders (such as eSafety, OAIC, etc), then with the Stakeholder

Page **35** of **52** D6.1 - Project Plan



Document Sensitivity: Public

publication input to the report without compromising impartiality. This also involves scrutiny by the Ethics Panel and Impartiality Panel for ACCS.

Finally, the task involves publication activities, stakeholder engagement (See T3.1) and making the report publicly available through the Project website (See T3.2).

Advisory Board before final preliminary report publication clearance from DITRDCA. [M5]

- **A-5.3.3** Identification of any prepublication remedial evaluations required (see T4.9) [M5]
- **A-5.3.4** Pre-publication quality control on the report.[M6]
- **A-5.3.5** Consideration of the preliminary report by the Impartiality Panel (see T1.4) and Ethics Panel (see T1.1) [M6]

D-5.3 Publication of the preliminary report; feeding into stakeholder events (See T3.1) and making the report publicly available through the project website (See T3.2). [M6]

MILESTONE 3: Completion of Trial and Delivery of a Preliminary Report [M6]

T5.4 Final Report and Summary – This task involves the production of the final report following any remedial evaluation or actions needed as a result of the preliminary report. The task includes the necessary pre-publication quality control checks and clearances that are required to include:

- (a) DITRDCA
- (b) eSafety Commissioner and OAIC
- (c) Ethics Review in accordance with AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research
- (d) Peer Review by the External Validators UNSW
- (e) Consideration (but not editorial changes) by our Stakeholder Advisory Board

A-5.4.1 Analysis of feedback from stakeholder events, public reaction, stakeholder reaction, participant reaction and other feedback from the publication of the preliminary report (See T5.3) [M7]

- **A-5.4.2** Identification and tasking of any remedial evaluations required (see T4.9) and integration of their results into the final report. [M7]
- **A-5.4.3** Redrafting of a final report, including pre-publication quality control on the report. [M7]
- **A-5.4.4** Engagement with DITRDCA and statutory stakeholders on the final report, including any requirements for review by the Australian Bureau of Statistics of pre-

Page 36 of 52 D6.1 - Project Plan



- (f) Ethics Panel
- (g) Impartiality Panel

Finally, on publication, this task includes the dissemination activities for the report including legal deposit in the National Library of Australia and feeding into stakeholder events (See T3.1) and making it publicly available through the project website (T3.2).

It is also anticipated that there will be other dissemination activities by DITRDCA, including if applicable scrutiny activities post-publication by the Senate.

publication requirements for Australian research subject to public scrutiny. [M8]

A-5.4.5 Consideration of the preliminary report by the Impartiality Panel (see T1.4) and Ethics Panel (see T1.1) [M8]

D-5.4.a Peer review of the final report by the University of New South Wales Al Institute. [M8]

D-5.4.b Publication of the final report, including allocation of ISBN data and legal deposit with the National Library of Australia; feeding into stakeholder events (See T3.1) and making the report publicly available through the project website (See T3.2). [M8]

MILESTONE 4: Completion of Final Report and Summary Document [M8]

Work Package 6: Programme Management, Risks & Quality Control

Work Stream Leaders: Tina Henderson & Keith Robinson

Work Package 6: Programme Management, Risks & Quality Control	Time period: M1-M8	5% of budget
Objective: This work package covers programme	Resources:	
management. This includes ensuring a structured quality	WP Leaders:	
Inagement approach to the project (using PM ²), and Suring that public money is spent appropriately, subject Tina Henderson, Project Management		anagement
to best value review including for any project	Keith Robinson, Financial Management	
procurements, managing risk and timescales and maintaining regular contact with the project commissioners	Project Consultant	
at DITRDCA. Finally this work package covers project		

Page 37 of 52 D6.1 - Project Plan



Age Assurance

Document Sensitivity: Public

compliance and final review and evaluation of the project as a whole. The Project Board will meeting fortnightly and includes: Tony Allen, Project Director, Andrew Hammond, Deputy Project Director & Chair of the STAC, George Billinge, Data, Ethics and Impartiality, Iain Corby, Stakeholder Relations, and Rhianne Kiddle, Senior Project Coordinator.

Need: PM² document set, Legal, Accounting, Bookkeeping, Project Evaluation

Tasks & Resources

T6.1 Production of a Project Plan This task includes the formal adoption of this project plan, timescales, GANTT chart, deliverables and milestones following contract discussions and negotiations with the Department for Infrastructure. This also includes the identification and agreement of KPIs and performance metrics for the discharge of the contract. This activity is pre-project start and should be completed by the beginning of M1.

Key Activities & Deliverables (in Bold):

- **A-6.1.1** Establish the project plan including the timescales, GANTT chart, deliverables and milestones. [M0]
- **A-6.1.2** Obtain approval for the project plan. [M0]
- D-6.1 Production of a project plan [M0]

MILESTONE 1: Completion of Project Plan [M0]

T6.2 Project Quality Control/Process Control/Records Management and PM² - This task will ensure rigorous project management, including maintaining quality controlled and adequate records of activity under the project. This includes a PM² project management methodology to deploy the tools, guidelines and templates for planning, managing and delivering the project. The Project Charter provides a set of guiding principles for the deployment of the project so that stakeholders can be informed through the project website (see T3.2) and aligned with the Ethics Handbook. This quality control process is part of the overall management of quality in accordance with the ISO 17065 accreditation and the deployment of laboratory testing in accordance with ISO 17025 accreditation. The Project Handbook helps team members to ensure consistency and compliance with project requirements, documentation and records.

- A-6.2.1 Establish the Project Charter:
 Defines project scope, objectives,
 stakeholders (see T3.1) and key
 deliverables from the project plan (see
 T6.1). This includes defining the ethical
 principles of the project (linked to the
 Ethics Handbook see T1.1) [M1]
- **A-6.2.2** Establish a Project Handbook providing detailed project management procedures.[M1]
- A-6.2.3 Establish and maintain an Issue Log: Records and tracks project issues. [M1 M8]
- A-6.2.4 Establish and maintain a Change Log to document changes and their impact on the project.[M1 – M8]

Page 38 of 52 D6.1 - Project Plan



Document Sensitivity: Public

	A-6.2.5 Undertake a Mid-Project Quality Review [M4] A-6.2.6 Undertake a Final Project Quality
	Review to feed into the Performance Review and Project Evaluation (see T6.6). [M8]
T6.3 Project Risk Management Plan This task involves establishing a risk management plan and maintaining an effective, reviewed and monitored risk register. This is also considered as a part of Monthly Contract Management Meetings (see T 6.4).	A-6.3.1 Creation of a Risk Log and continuous monitoring of the Risk Log in Fortnightly Project Team meetings (see T6.4) and the Monthly Contract Management Meetings with DITRDCA (see T6.4). [M1 – M8]
	D-6.3 Creating a Risk Management Plan [M1]
T6.4 Monthly Contract Management Meetings This task involves a fortnightly project team meeting and a monthly contract management meeting with the DITRDCA(#RFT	A-6.4.1 Develop an agreed format for project status reports for sharing progress with DITRDCA. [M1]
4.4.1). The meeting will be supported by an agreed format for progress reporting. In parallel with the monthly contract management meetings, the project team will also hold	A-6.4.2 Implement a fortnightly project management meeting. [M1 – M8]
internal fortnightly project coordination meetings.	A-6.4.3 Participate in monthly contract management meetings with DITRDCA. [M1 – M8]
T6.5 Project Compliance This task includes assurance for contract compliance, accounting for spending of public money, accounting and audit. It also includes adherence to	A-6.5.1 Identification of contract compliance issues relevant to this project [M0]
standards including existing ISO/IEC 17065 accreditation and the Protective Security Policy Framework, Privacy Act 1988, any Legislative requirements, Chief Executives Instructions, Archives Act 1983, Public Governance, Performance, Accountability Act 2013 and any requirements of the Australian National Audit Office.	A-6.5.2 Completion of sub-contracting arrangements, contracts and banking payments (including ethics, AML and sanctions compliance) [M2]. A-6.5.3 Half-Way Accounting for
	Expenditure [M4]

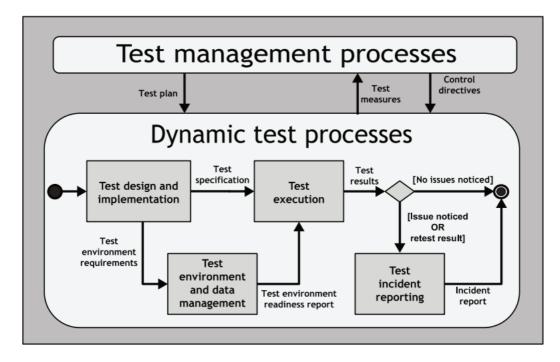
Page 39 of 52 D6.1 - Project Plan



	D-6.5 Final Accounting for Expenditure [M8]
T6.6 Performance Review & Project Evaluation This task involves internal and external review of contract performance. It will include assurance from the project legal advisors on compliance, any external audit of expenditure required for project compliance (see T6.5) and an analysis of the timeliness and acceptability of project deliverables. The review will also examine lessons learned (from the project itself rather than from the age assurance systems under evaluation – see T5.4). The aim of project evaluation is to help the project partners and DITRDCA to deliver improved project management and delivery in the future.	A-6.6.1 Prepare a final contract performance review and evaluation. This to include declarations of legal compliance and analysis of project deliverables, timeliness and acceptability. [M8] D-6.6 Prepare a Lessons Learned Report to capture insights from project execution for future improvements. [M8]

Practical Deployment of Testing Activity

The Project Team's approach to test management will be in accordance with ISO/IEC 29119-2:2021 Software and systems engineering - Software testing - Part 2: Test processes, including the overall test management process.



Page 40 of 52 D6.1 - Project Plan



Document Sensitivity: Public

It is, of course, for the evaluation design phase to specify the exact approaches to testing, but from experience of undertaking testing elsewhere, it is anticipated that the following description of how the tests are likely to be deployed for each technology are as follows:

- a) Age verification methods Ensure that users are accurately verified as being above or below a required age threshold using valid identity documents or other verification methods. This will involve document verification testing using a dataset of 4,000+ legitimate, fake, and altered identity documents (e.g., passports, driver's licenses) from various regions, nationally and internationally. The documents are presented to the UX gateway for participant age assurance providers evaluate whether the system correctly accepts valid documents and rejects fraudulent or tampered ones. There will also be tests with documents that are worn, slightly damaged or poorly scanned to assess how tolerant the system is to imperfect inputs. The Project Team will perform security testing to identify vulnerabilities that could allow users to bypass verification, including biometric comparisons and deep fake and video injection presentation attack.
- b) Age estimation methods Test the system's ability to estimate a user's age based on biological or behavioural features that vary with age. The Project Team's existing test datasets will be augmented with additional images of users of varying ages, ethnicities and genders which reflect the full diversity of the Australian population (27.6% of whom were born overseas), including high-quality and lower-quality images (e.g., different lighting conditions, angles and facial expressions). The images will be uploaded and the systems checked to see how accurately it estimates age, comparing the results with the actual ages and perform tests with both static photos and real-time camera feeds. The Project Team will also explore voice, hand geometry or typing speed analysis, test different age groups and analyse the estimation results. There will be testing with outliers, such as individuals with facial features that may not correspond to their chronological age (e.g., younger adults with premature aging, or children with adult-like features). The Project will also undertake outcome error parity analysis.
- c) Age inference methods Test systems that infer a user's age based on data inputs such as purchase history, possession of other age-related evidence, browser behaviour or online activity. The Team will analyse the assumptions, the reliability of the inference behind decision making tools, simulating various user behaviours online (e.g., browsing child-friendly content vs. adult-targeted services) using existing and new avatar test accounts that mimic different personas, including children, teenagers, and adults, with different browsing histories and online purchase behaviours. The Team will ensure that the system does not violate privacy policies and correctly anonymizes data where required.
- d) Parental Consent Technology The Project will examine whether parental consent systems accurately verify a parent or guardian's identity and relationship to the child before granting access to services. This includes simulating different parent-child relationships, testing various identity verification methods (e.g., credit card verification, email, document upload). The Project Team will also test for cases like foster parents, legal guardians, or step-parents to ensure the system accommodates complex family structures. This will include simulated requests for access from children of different ages and assess how the system handles multiple requests, including revoking

Page 41 of 52 D6.1 - Project Plan



consent and there will be attempts to simulate potential fraudulent behaviour, such as children trying to impersonate parents, or bad-actors seeking to groom children through offers of fraudulent parental consent. Ensure the system is resistant to such efforts.

e) Parental Control Technology – The Project Team will test how effectively parental control technologies can limit access to content or services based on a child's age and how parents can monitor or restrict activity. This involves creating test user accounts for different age groups and test access to restricted services (e.g. age-restricted content or apps) and examine if content is appropriately filtered or blocked based on user profiles. The Team will test different levels of parental controls, from time restrictions to content categories and evaluate how easy it is for parents to configure these settings. The Team will examine how intuitive the parental control interface is for setting restrictions, monitoring activity and receiving notifications, ensuring parents can reasonably easily modify settings without the need for technical expertise. This includes simulated attempts by children to bypass parental controls (e.g. changing settings or creating fake accounts) to assess the robustness of the parental control measures.

In addition to these, the Project Team will proactively examine the practice statements (ISO/IEC DIS 27566-1, Clause 11) of age assurance providers, intermediaries and relying parties. This includes examining the accessibility and user awareness, complaint handling and user feedback testing. This could include focus groups with parents, children, and third-party testers to assess how real users interact with the system. This will help identify usability issues and refine workflows.

Preliminary Report Production

The team of specialist graphic designers, data visualisation, copyrighters and editors will lead the report production. The Project's graphic designers Lisa Ellinger (AU), Aino Am (AU) and Jo Carter (UK) under the scientific direction of <u>Dr Dinindu Koliya Wedanage</u>, <u>PhD</u>; <u>Dr Asad Ali, PhD</u> and Surya Ramessh will lead the development of simple intuitive data visualisations, including charts, tables, graphs, maps, infographics and dashboards as needed.

The Project's copy team, led by Rhianne Kiddle under the scientific direction of <u>Dr Mark Pedersen</u> and <u>Dr Kelvin Ross</u> from KJR will lead the development of the reports ensuring clarity, coherence, consistency and correctness of the reports.

The whole report production will be overseen by an Editorial Team chaired by Tony Allen as subject matter expert in this field.

This task also involves ensuring that the Department and statutory agencies in Australia have effective prepublication input to the report without compromising impartiality. This also involves scrutiny by the Ethics Panel and Impartiality Panel for ACCS.

The plan involves the production of a preliminary report by the second week of April 2025.

Finally, the task involves post-publication activities, stakeholder engagement and making the report publicly available through the Project website.

Page 42 of 52 D6.1 - Project Plan



Final Report Production

This plan includes the production of the final report following any remedial evaluation or actions needed as a result of the preliminary report. The task includes the necessary pre-publication quality control checks and clearances that are required to include:

- a) The Department
- b) eSafety Commissioner and OAIC
- c) Ethics Review in accordance with the Ethics Framework AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research
- d) Peer Review by Prof. Toby Walsh at the University of New South Wales
- e) Consideration (but not editorial changes) by the Stakeholder Advisory Board
- f) ACCS Impartiality Panel

The plan involves the production of a final report by the end of June 2025.

Finally, on publication, this task includes the dissemination activities for the report including legal deposit in the National Library of Australia and feeding into stakeholder events and making it publicly available through the project website.

The Project Team also anticipate and will support other dissemination activities by the Department, including if applicable scrutiny activities post-publication by the Senate.

Conclusion

The Age Assurance Technology Trial represents a significant step forward in understanding and implementing effective, reliable and privacy-conscious age assurance technologies. As online safety concerns grow, particularly around protecting minors from age-inappropriate content, this trial will provide essential data on the practical, ethical and technological considerations of various age assurance methods.

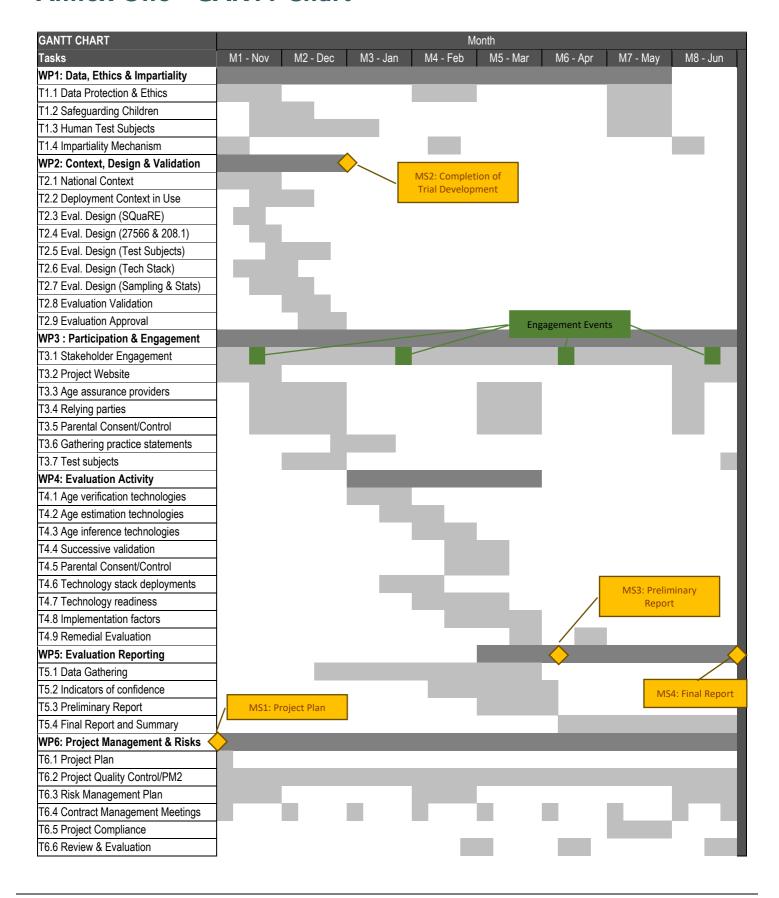
Through rigorous testing, stakeholder engagement and compliance with privacy standards, the trial aims to identify solutions that not only meet regulatory needs but are also feasible for widespread adoption. The insights gained will support the development of robust guidelines and policies, informing future legislation and setting a benchmark for age assurance standards in Australia.

The successful completion of this trial will enable policymakers, digital platforms and technology providers to make informed decisions on implementing age assurance, creating a safer online environment for young Australians. This project underscores Australia's commitment to pioneering solutions that balance safety, privacy and innovation in the digital age.

Page 43 of 52 D6.1 - Project Plan



Annex One - GANTT Chart



Page 44 of 52 D6.1 - Project Plan



Annex Two - Monthly Schedule

Month Profile – November 2024 [M1]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Create Ethics Handbook (A-1.1.1); DPIA (A-1.1.2); Data Collection Ethical Protocol (A-1.1.3)
T1.2 Safeguarding Children	Establish Stakeholders & Contacts for Safeguarding Children Policy (A-1.2.1)
T1.3 Human Test Subjects	Consideration of Human Test Subject Protocols(A-1.3.1); Applicability of AIATSIS CoP (A-1.3.2)
T1.4 Impartiality Mechanism	Impartiality Panel Report (A-1.4.1); Conflict of Interest Register (A-1.4.2)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	Identification of Materials, Research & Reports on National Context (A-2.1.1)
T2.2 Deployment Context in Use	Gathering Deployment Contexts (A-2.2.1); ASD IS Manual (A-2.2.2); Indigenous Pop (A-2.2.3); DITRDCA (A-2.2.4)
T2.3 Eval. Design (SQuaRE)	Analysis of Relevant Aspects of SQuaRE (ISO 25010) (A-2.3.1) & Software Testing (ISO 29119)
T2.4 Eval. Design (27566 & 2089.1)	Analysis of ISO DIS 27566 & Mapping to SQuaRE (A-2.4.1); Start on Evaluation Matrix (A-2.3.2)
T2.5 Eval. Design (Test Subjects)	Starting to gather & analyse age assurance methods (A-2.5.1); Tokenised Approaches (A-2.5.2) & Taxonomy (A-2.5.3)
T2.6 Eval. Design (Tech Stack)	Start understanding source deployments in RPs & test protocols for context in use (A-2.6.2)
T2.7 Eval. Design (Sampling & Stats)	Development of Statistics Theory (A-2.7.1); Measures (A-2.7.2); Measurement uncertainty (A-2.7.3) & Bias (A-2.7.4)
T2.8 Evaluation Validation	Establish contact with Prof Toby Walsh & Understand Expectations (A-2.8.1)
T2.9 Evaluation Approval	Prepare an evaluation proposal report (D-2.8); Establish DITRDCA needs for trial approval (A-2.9.1)
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	Stakeholder Matrix (D-3.1); Establish Advisory Board (A-3.1.1); Initial Stakeholder Meetings (A-3.1.2)
T3.2 Project Website	Create Project Website, Domain, Consistent Design Style (A3.2.1) (see A-5.1.1 dependency)
T3.3 Age assurance providers	Start to establish contact with AVPA/ACCS members/clients, invitations to stakeholder event (A-3.3.1)
T3.4 Relying parties	Start to establish contact with AlIA, ACS, TCA, DTSP & Relying Parties, invitations to stakeholder event (A-3.4.1)
T3.5 Parental Consent/Control	Start to establish contact with parental consent/control stakeholders, invitations to stakeholder event (A-3.5.1)
T3.6 Gathering practice statements	Early consideration of the requirements for online portal to gather practice statements (A-3.6.1)
T3.7 Test subjects	No activity yet
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	No activity yet
T4.2 Age estimation technologies	No activity yet
T4.3 Age inference technologies	No activity yet
T4.4 Successive validation	No activity yet
T4.5 Parental Consent/Control	No activity yet
T4.6 Technology stack deployments	No activity yet
T4.7 Technology readiness	No activity yet
T4.8 Implementation factors	No activity yet
T4.9 Remedial Evaluation	No activity yet
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	Graphic Design, Brand and Colour Scheme (A-5.1.1) (Note A-3.2.1 is dependent)
T5.2 Indicators of confidence	No activity yet
T5.3 Preliminary Report	No activity yet
T5.4 Final Report and Summary	No activity yet
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	Completion & Approval of Project Plan (D-6.1 & MS 1); Gantt Chart; Deliverables & Milestones (A-6.1.1)
T6.2 Project Quality Control/PM2	Project Charter (A-6.2.1); Project Handbook (A-6.2.2); Issue Log (A-6.2.3); Change Log (A-6.2.4)
T6.3 Risk Management Plan	Create a Risk Log (A-6.3.1); Create a Risk Management Plan (D-6.3)
T6.4 Contract Management Meetings	Format for Project Status Reports (A-6.4.1); Establish PM Meeting Schedule (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Identification of Compliance Issues (A-6.5.1); Sub-Contracting (A-6.5.2); Finance Arrangements (A-6.5.2)
T6.6 Review & Evaluation	Established performance monitoring, project tasking approach (A-6.6.1)

Page **45** of **52** D6.1 - Project Plan



Month Profile – December 2024 [M2]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Monitoring Activity (A-1.1.4)
T1.2 Safeguarding Children	Establish Safeguarding Children Policy (A-1.2.1)
T1.3 Human Test Subjects	Establish Human Test Subject Protocols (A-1.3.1); Applicability of AIATSIS CoP (A-1.3.2); Prep ED&I Plan (A-1.3.3)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	Analysis of the Australian Context Report (D-2.1)
T2.2 Deployment Context in Use	Analysis of Deployment Contexts (A-2.2.1); ASD IS Manual (A-2.2.2); Indigenous Pop (A-2.2.3)
T2.3 Eval. Design (SQuaRE)	Evaluation Matrix for SQuaRE (ISO 25010) (A-2.3.2) & Software Testing (ISO 29119)
T2.4 Eval. Design (27566 & 2089.1)	Analysis of IEEE 2089.1 & Mapping to SQuaRE (A-2.4.2)
T2.5 Eval. Design (Test Subjects)	Analysis of AA methods (A-2.5.1); Tokenised Approaches (A-2.5.2) & Taxonomy (A-2.5.3), Modality Protocol (D-2.5)
T2.6 Eval. Design (Tech Stack)	Identify source deployments in RPs & test protocols for context in use (A-2.6.2); Tech Stack Analysis (A-2.6.1)
T2.7 Eval. Design (Sampling & Stats)	Development of Statistics Theory (A-2.7.1); Measures (A-2.7.2); Measurement uncertainty (A-2.7.3) & Bias (A-2.7.4)
T2.8 Evaluation Validation	Prepare External Validation Report (D-2.8)
T2.9 Evaluation Approval	Evaluation Approval from DITRDCA (A-2.9.1); Trial Development Approval (MS 2)
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	No specific activity this month, but support for broader project and communications.
T3.2 Project Website	Maintaining publication of docs (A-3.2.2); Build a Call for Participation Portal (A-3.2.3)
T3.3 Age assurance providers	Establish contact with AVPA/ACCS members/clients & other expressions of interest (A-3.3.1)
T3.4 Relying parties	Establish contact with AlIA, ACS, TCA, DTSP & Relying Parties & other expressions of interest (A-3.4.1)
T3.5 Parental Consent/Control	Establish contact with parental consent/control stakeholders, invitations to stakeholder event (A-3.5.1)
T3.6 Gathering practice statements	Create online portal to gather practice statements (A-3.6.1)
T3.7 Test subjects	Start to consider the ethics, forms and approaches to gaining test subject participation (A-3.7.1 & A-3.7.2)
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	No activity yet
T4.2 Age estimation technologies	No activity yet
T4.3 Age inference technologies	No activity yet
T4.4 Successive validation	No activity yet
T4.5 Parental Consent/Control	No activity yet
T4.6 Technology stack deployments	No activity yet
T4.7 Technology readiness	No activity yet
T4.8 Implementation factors	No activity yet
T4.9 Remedial Evaluation	No activity yet
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	No activity yet
T5.2 Indicators of confidence	No activity yet
T5.3 Preliminary Report	No activity yet
T5.4 Final Report and Summary	No activity yet
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Sub-Contracting (A-6.5.2); Finance Monitoring (A-6.5.2)
T6.6 Review & Evaluation	Maintain performance monitoring, project tasking approach (A-6.6.1)

Page 46 of 52 D6.1 - Project Plan

Document Sensitivity: Public

Month Profile – January 2025 [M3]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Monitoring Activity (A-1.1.4)
T1.2 Safeguarding Children	Establish Safeguarding Children Policy (A-1.2.1)
T1.3 Human Test Subjects	Establish Human Test Subject Protocols (A-1.3.1); Applicability of AIATSIS CoP (A-1.3.2); Prep ED&I Plan (A-1.3.3)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	TASK COMPLETED
T2.2 Deployment Context in Use	TASK COMPLETED
T2.3 Eval. Design (SQuaRE)	TASK COMPLETED
T2.4 Eval. Design (27566 & 2089.1)	TASK COMPLETED
T2.5 Eval. Design (Test Subjects)	TASK COMPLETED
T2.6 Eval. Design (Tech Stack)	Development of Tech Stack Analysis (A-2.6.1)
T2.7 Eval. Design (Sampling & Stats)	TASK COMPLETED
T2.8 Evaluation Validation	TASK COMPLETED
T2.9 Evaluation Approval	TASK COMPLETED
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	Pre-Participation Stakeholder Event (A-3.1.3)
T3.2 Project Website	Maintaining publication of docs (A-3.2.2); Creation of Online Forms & Qs (A-3.2.4)
T3.3 Age assurance providers	Parameters and Guidelines for Age Assurance Provider Participation (A-3.3.2)
T3.4 Relying parties	Parameters and Guidelines for Relying Parties Participation (A-3.4.2)
T3.5 Parental Consent/Control	Establish contact with parental consent/control stakeholders, invitations to stakeholder event (A-3.5.1)
T3.6 Gathering practice statements	Briefing for Participants on Practice Statements (A-3.6.2)
T3.7 Test subjects	Parameters for test subject participation (A-3.7.1 & A-3.7.2); Mystery Shopping (A-3.7.3); UX AT (A3.7.4)
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	Contribution to A-3.6.2 practice statements (in preparation for A-4.1.1); Methodologies (A-4.1.2)
T4.2 Age estimation technologies	Contribution to A-3.6.2 practice statements (in preparation for A-4.2.1); Methodologies (A-4.2.2)
T4.3 Age inference technologies	Contribution to A-3.6.2 practice statements (in preparation for A-4.3.1); Methodologies (A-4.3.2)
T4.4 Successive validation	Contribution to A-3.6.2 practice statements (in preparation for A-4.4.1); Methodologies (A-4.3.2)
T4.5 Parental Consent/Control	Contribution to A-3.6.2 practice statements (in preparation for A-4.5.1); Evaluation Methods (A-4.5.2 & A-4.5.3)
T4.6 Technology stack deployments	Contribution to A-3.6.2 practice statements (in preparation for A-4.6.1)
T4.7 Technology readiness	No activity yet
T4.8 Implementation factors	No activity yet
T4.9 Remedial Evaluation	No activity yet
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	Start to draw together a report structure & skeleton (A-5.1.1)
T5.2 Indicators of confidence	No activity yet
T5.3 Preliminary Report	No activity yet
T5.4 Final Report and Summary	No activity yet
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2)
T6.6 Review & Evaluation	Maintain performance monitoring, project tasking approach (A-6.6.1)

Page 47 of 52 D6.1 - Project Plan

Document Sensitivity: Public

Month Profile – February 2025 [M4]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Monitoring Activity (A-1.1.4); Carry out a Data & Ethics Review on Data Collection (A-1.1.4)
T1.2 Safeguarding Children	No specific activity this month
T1.3 Human Test Subjects	Monitoring of ED&I Activity (A-1.3.4)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2); Mid Project Impartiality Report (A-1.4.3)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	TASK COMPLETED
T2.2 Deployment Context in Use	TASK COMPLETED
T2.3 Eval. Design (SQuaRE)	TASK COMPLETED
T2.4 Eval. Design (27566 & 2089.1)	TASK COMPLETED
T2.5 Eval. Design (Test Subjects)	TASK COMPLETED
T2.6 Eval. Design (Tech Stack)	TASK COMPLETED
T2.7 Eval. Design (Sampling & Stats)	TASK COMPLETED
T2.8 Evaluation Validation	TASK COMPLETED
T2.9 Evaluation Approval	TASK COMPLETED
WP3 : Participation & Engagement	WP Lead : Iain Corby
T3.1 Stakeholder Engagement	No specific activity this month, but support for broader project and communications.
T3.2 Project Website	Maintaining publication of docs (A-3.2.2); Online Bug Reporting Mechanism (A-3.2.5)
T3.3 Age assurance providers	Issuing Call for Participants - Age Assurance Providers (A-3.3.3)
T3.4 Relying parties	Issuing Call for Participants – Relying Parties (A-3.4.3)
T3.5 Parental Consent/Control	Establish Parameters for parental consent/control stakeholders Participation (A-3.5.2)
T3.6 Gathering practice statements	Open call for Practice Statements to be submitted (A-3.6.3)
T3.7 Test subjects	Data Collection Requirements (A-3.7.5); Call for Participants (A-3.7.6); Schools/Ed (A-3.7.7); Indigenous Pop (A-3.7.8)
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	Analysis of Practice Statements (A-4.1.1); Comparative Analysis (A-4.1.3); Statistical Analysis (A-4.1.4)
T4.2 Age estimation technologies	Analysis of Practice Statements (A-4.2.1); Comparative Analysis (A-4.2.3); Statistical Analysis (A-4.2.4)
T4.3 Age inference technologies	Analysis of Practice Statements (A-4.3.1); Comparative Analysis (A-4.3.3); Statistical Analysis (A-4.3.4)
T4.4 Successive validation	Analysis of Practice Statements (A-4.4.1)
T4.5 Parental Consent/Control	Analysis of Practice Statements (A-4.5.1)
T4.6 Technology stack deployments	Analysis of Practice Statements (A-4.6.1 & 4.6.2); Evaluation Methods (A-4.6.4)
T4.7 Technology readiness	Preparation of Technology Readiness Assessment (A-4.7.1)
T4.8 Implementation factors	Preparation of Implementation Factors (A-4.8.1)
T4.9 Remedial Evaluation	No activity yet
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	Creation of report structure & skeleton (A-5.1.1)
T5.2 Indicators of confidence	Starting to gather evaluation results (A-5.2.1)
T5.3 Preliminary Report	Starting to gather content for the Preliminary Report (A-5.3.1)
T5.4 Final Report and Summary	No activity yet
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4); Mid Project Quality Review (A-6.2.5)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2)
T6.6 Review & Evaluation	Maintain performance monitoring, project tasking approach (A-6.6.1)

Page 48 of 52 D6.1 - Project Plan

Document Sensitivity: Public

Month Profile – March 2025 [M5]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Monitoring Activity (A-1.1.4)
T1.2 Safeguarding Children	No specific activity this month
T1.3 Human Test Subjects	Monitoring of ED&I Activity (A-1.3.4)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	TASK COMPLETED
T2.2 Deployment Context in Use	TASK COMPLETED
T2.3 Eval. Design (SQuaRE)	TASK COMPLETED
T2.4 Eval. Design (27566 & 2089.1)	TASK COMPLETED
T2.5 Eval. Design (Test Subjects)	TASK COMPLETED
T2.6 Eval. Design (Tech Stack)	TASK COMPLETED
T2.7 Eval. Design (Sampling & Stats)	TASK COMPLETED
T2.8 Evaluation Validation	TASK COMPLETED
T2.9 Evaluation Approval	TASK COMPLETED
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	No specific activity this month, but support for broader project and communications.
T3.2 Project Website	Maintaining publication of docs (A-3.2.2)
T3.3 Age assurance providers	TASK COMPLETED but ongoing engagement activity under T3.1
T3.4 Relying parties	TASK COMPLETED but ongoing engagement activity under T3.1
T3.5 Parental Consent/Control	Issuing Call for Participants – parental consent/control stakeholders (A-3.5.3)
T3.6 Gathering practice statements	Collation of Practice Statements (D-3.6)
T3.7 Test subjects	TASK COMPLETED but ongoing engagement activity under T3.1
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	Technology Readiness Assessments (A-4.1.5); Qualitative Analysis (A-4.1.6)
T4.2 Age estimation technologies	Technology Readiness Assessments (A-4.2.5); Outcome Error Parity (A-4.2.6); Qualitative Analysis (A-4.1.7)
T4.3 Age inference technologies	Technology Readiness Assessments (A-4.3.5); Qualitative Analysis (A-4.3.6)
T4.4 Successive validation	Comparative Analysis (A-4.4.3); Technology Readiness Assessments (A-4.4.4); Qualitative Analysis (A-4.4.5)
T4.5 Parental Consent/Control	Comparative Analysis Consent (A-4.5.4) Control (A-4.5.5); TRA (A-4.5.6); Qualitative Analysis (A-4.5.7)
T4.6 Technology stack deployments	Qualitative Analysis (A-4.6.5 & A-4.6.7); Technology Readiness Assessments (A-4.6.6)
T4.7 Technology readiness	Technology Readiness Assessment (A-4.7.1); Market Wide Analysis (A-4.7.2)
T4.8 Implementation factors	Implementation Factors (A-4.8.1)
T4.9 Remedial Evaluation	Remedial Evaluations (A-4.9.1)
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	Collation of Reports from Workstreams (A-5.1.2); Creation of Graphic Assets, Tables & Contents (A-5.1.3)
T5.2 Indicators of confidence	Reporting of Analysis (A-5.2.1)
T5.3 Preliminary Report	Implementing Content for the Preliminary Report (A-5.3.1); Stakeholder Reviews (A-5.3.2); Remedials (A-5.3.3)
T5.4 Final Report and Summary	No activity yet
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4); Mid Project Quality Review (A-6.2.5)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2)

Page 49 of 52 D6.1 - Project Plan

Document Sensitivity: Public

Month Profile – April 2025 [M6]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Monitoring Activity (A-1.1.4); Preparation of Data & Ethics Assurance Data (D-1.1)
T1.2 Safeguarding Children	Preparation of Safeguarding Children Evidence (D1.2)
T1.3 Human Test Subjects	Monitoring of ED&I Activity (A-1.3.4)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	TASK COMPLETED
T2.2 Deployment Context in Use	TASK COMPLETED
T2.3 Eval. Design (SQuaRE)	TASK COMPLETED
T2.4 Eval. Design (27566 & 2089.1)	TASK COMPLETED
T2.5 Eval. Design (Test Subjects)	TASK COMPLETED
T2.6 Eval. Design (Tech Stack)	TASK COMPLETED
T2.7 Eval. Design (Sampling & Stats)	TASK COMPLETED
T2.8 Evaluation Validation	TASK COMPLETED
T2.9 Evaluation Approval	TASK COMPLETED
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	Stakeholder Event for Preliminary Report (A-3.1.4)
T3.2 Project Website	Maintaining publication of docs (A-3.2.2)
T3.3 Age assurance providers	TASK COMPLETED but ongoing engagement activity under T3.1
T3.4 Relying parties	TASK COMPLETED but ongoing engagement activity under T3.1
T3.5 Parental Consent/Control	TASK COMPLETED but ongoing engagement activity under T3.1
T3.6 Gathering practice statements	TASK COMPLETED
T3.7 Test subjects	TASK COMPLETED but ongoing engagement activity under T3.1
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	TASK COMPLETED
T4.2 Age estimation technologies	TASK COMPLETED
T4.3 Age inference technologies	TASK COMPLETED
T4.4 Successive validation	TASK COMPLETED
T4.5 Parental Consent/Control	TASK COMPLETED
T4.6 Technology stack deployments	TASK COMPLETED
T4.7 Technology readiness	Individual Technology Readiness Assessments (A-4.7.3)
T4.8 Implementation factors	Implementation Factors Analysis (A-4.8.2); Market Economic Analysis (A-4.8.3)
T4.9 Remedial Evaluation	Remedial Evaluations (A-4.9.1)
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	Peer Review of the Preliminary Report (D-5.1)
T5.2 Indicators of confidence	TASK COMPLETED
T5.3 Preliminary Report	Quality Control (A-5.3.4); Impartiality Panel & Ethics Panel (A-5.3.5); Preliminary Report (MS 3)
T5.4 Final Report and Summary	No activity yet
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2)
T6.6 Review & Evaluation	Maintain performance monitoring, project tasking approach (A-6.6.1)

Page 50 of 52 D6.1 - Project Plan

) .

Age Assurance Technology Trial

Document Sensitivity: Public

Month Profile – May 2025 [M7]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Assurance Report (D-1.1)
T1.2 Safeguarding Children	Safeguarding Children Assurance Report (D1.2)
T1.3 Human Test Subjects	Monitoring of ED&I Activity (A-1.3.4)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2); Project Impartiality Report (D-1.4)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	TASK COMPLETED
T2.2 Deployment Context in Use	TASK COMPLETED
T2.3 Eval. Design (SQuaRE)	TASK COMPLETED
T2.4 Eval. Design (27566 & 2089.1)	TASK COMPLETED
T2.5 Eval. Design (Test Subjects)	TASK COMPLETED
T2.6 Eval. Design (Tech Stack)	TASK COMPLETED
T2.7 Eval. Design (Sampling & Stats)	TASK COMPLETED
T2.8 Evaluation Validation	TASK COMPLETED
T2.9 Evaluation Approval	TASK COMPLETED
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	No specific activity this month, but support for broader project and communications.
T3.2 Project Website	Maintaining publication of docs (A-3.2.2)
T3.3 Age assurance providers	TASK COMPLETED but ongoing engagement activity under T3.1
T3.4 Relying parties	TASK COMPLETED but ongoing engagement activity under T3.1
T3.5 Parental Consent/Control	TASK COMPLETED but ongoing engagement activity under T3.1
T3.6 Gathering practice statements	TASK COMPLETED
T3.7 Test subjects	TASK COMPLETED but ongoing engagement activity under T3.1
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	TASK COMPLETED
T4.2 Age estimation technologies	TASK COMPLETED
T4.3 Age inference technologies	TASK COMPLETED
T4.4 Successive validation	TASK COMPLETED
T4.5 Parental Consent/Control	TASK COMPLETED
T4.6 Technology stack deployments	TASK COMPLETED
T4.7 Technology readiness	TASK COMPLETED
T4.8 Implementation factors	TASK COMPLETED
T4.9 Remedial Evaluation	Remedial Evaluations (A-4.9.1) (dependent on A-5.4.2)
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	TASK COMPLETED
T5.2 Indicators of confidence	TASK COMPLETED
T5.3 Preliminary Report	TASK COMPLETED
T5.4 Final Report and Summary	Feedback Analysis (A-5.4.1); Remedial Work (A-5.4.2); Drafting (A-5.4.3); Engagement (A-5.4.4 & A-5.4.5)
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2)
T6.6 Review & Evaluation	Maintain performance monitoring, project tasking approach (A-6.6.1)

Page 51 of 52 D6.1 - Project Plan



Month Profile – June 2025 [M8]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	TASK COMPLETED
T1.2 Safeguarding Children	TASK COMPLETED
T1.3 Human Test Subjects	Review of ED&I Activity for Project Review (A-1.3.4) (see T6.6)
T1.4 Impartiality Mechanism	TASK COMPLETED
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	TASK COMPLETED
T2.2 Deployment Context in Use	TASK COMPLETED
T2.3 Eval. Design (SQuaRE)	TASK COMPLETED
T2.4 Eval. Design (27566 & 2089.1)	TASK COMPLETED
T2.5 Eval. Design (Test Subjects)	TASK COMPLETED
T2.6 Eval. Design (Tech Stack)	TASK COMPLETED
T2.7 Eval. Design (Sampling & Stats)	TASK COMPLETED
T2.8 Evaluation Validation	TASK COMPLETED
T2.9 Evaluation Approval	TASK COMPLETED
WP3 : Participation & Engagement	WP Lead : lain Corby
T3.1 Stakeholder Engagement	Final Report Stakeholder Event (A-3.1.5)
T3.2 Project Website	Maintaining publication of docs (A-3.2.2)
T3.3 Age assurance providers	TASK COMPLETED but ongoing engagement activity under T3.1
T3.4 Relying parties	TASK COMPLETED but ongoing engagement activity under T3.1
T3.5 Parental Consent/Control	TASK COMPLETED but ongoing engagement activity under T3.1
T3.6 Gathering practice statements	TASK COMPLETED
T3.7 Test subjects	TASK COMPLETED but ongoing engagement activity under T3.1
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	TASK COMPLETED
T4.2 Age estimation technologies	TASK COMPLETED
T4.3 Age inference technologies	TASK COMPLETED
T4.4 Successive validation	TASK COMPLETED
T4.5 Parental Consent/Control	TASK COMPLETED
T4.6 Technology stack deployments	TASK COMPLETED
T4.7 Technology readiness	TASK COMPLETED
T4.8 Implementation factors	TASK COMPLETED
T4.9 Remedial Evaluation	TASK COMPLETED
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering T5.2 Indicators of confidence	TASK COMPLETED TASK COMPLETED
	TASK COMPLETED TASK COMPLETED
T5.3 Preliminary Report T5.4 Final Report and Summary	Engagement (A-5.4.4 & A-5.4.5) Impartiality & Ethics Panels (A-5.4.6); Peer Review (D-5.4.a) Publication (D-5.4.b);
113.4 Final Report and Summary	Final Report and Summary Document (MS4)
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	TASK COMPLETED
T6.2 Project Quality Control/PM2	Final Project Quality Review (A-6.2.6)
T6.3 Risk Management Plan	TASK COMPLETED
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2); Final Accounting for Expenditure (D-6.5)
T6.6 Review & Evaluation	Performance Review Evaluation (A-6.6.1); Project Lessons Learned Report (D-6.6)

Page 52 of 52 D6.1 - Project Plan