

A banner graphic with a dark blue background and a red horizontal stripe at the bottom. On the left, there is a stylized Australian flag (green and white with a white Union Jack and seven white stars) and several circular icons in shades of green and blue. The icons include a person silhouette, a document with '00000', a database cylinder, and a shield with a checkmark. The text 'Age Assurance Technology Trial' is written in white on the dark blue background.

Age Assurance Technology Trial

Stakeholder Advisory Board

Professor Jon Rouse APM

29 January, 2024

Agenda

- Agreement to the minutes of the last meeting
- Introductions of new members
- Expressions of Interest so far
- Evaluation Proposal Feedback
- Terms of Reference edits
- Ethics update
- Next steps for the trial
- Open discussion

Advisory Board Members



Advisory Board Members

- Tim Levy – Qoira Limited
 - Melinda Tankard-Reist – Collective Shout
 - Campbell Wilson – Monash University
 - Jenny Duxbury – Digi
 - Deborah Young – RegTech
 - Amber Hawkes – Blue Lantern Consulting
 - Ajoy Ghosh – Cyber Alchemist
 - Susan McLean – Cybersafety Solutions
 - Kirra Pendergast – Safe on Social
 - Conrad Townson – IFYS
 - Amanda Third – Western Sydney University
 - Carol Ronken – Bravehearts
 - Cheryl Seeto - Meta
 - Colm Gannon – ICMEC
 - Maree Crabbe – It's time we talked
 - Peter Violaris - IDVerse
 - Ben Au - SNAP
- Observers
- Julie Inman Grant – eSafety (or delegates)
 - Waheeduddin Jayhoon – Aus Government

Expressions of Interest



38 Expressions of Interest

Arissian Ltd

Asure ID

Australian Payments Plus (ConnectID)

Austrroads

Civic

DigiChek

Eden Game Development Centre

euCONSENT ASBL

Frankie Financial Ptd Ltd T/A FrankieOne

Fujitsu

GBG PLC

General Identity Protocol Limited

GeoComply

IDmission

IDVerse an OCR Labs company

IDVerse and iProov (joint EOI)

Incode Technologies

iProov

k-ID (Kidentify Pte. Ltd.)

Meta

MyMahi Ltd

Needemand

Netsweeper

One Click Group

Persona

Privately SA

Qoria Limited

R2 Labs Pty Ltd

ShareRing

Shayype Solutions Ltd

Snap Inc and Meta (joint EOI)

TomorrowX

TruAnon

Trust Stamp

TrustElevate

VerifyChain Pty Ltd

Verifymy

Yoti

Evaluation Proposal Feedback

Evaluation Proposal Overview

- Methodology composed of four pillars:
 1. An ethical framework, including activities relating to data protection, child safeguarding, impartiality and inclusion of Aboriginal Australians and Torres Strait Islander peoples. This will inform all trial activities and deliverables.
 2. The assessment methodology, including the evaluation criteria and test strategy, which will be derived from and informed by all relevant ISO standards.
 3. Stakeholder engagement, including the recruitment of user participants, the recruitment of technology providers, vendor interviews and strategies to inform all relevant stakeholders.
 4. Project management and risk assessment.

Evaluation Proposal: Assessment Methodology/Test Strategy

- The scope of the test effort includes technologies which provide:
 - Age Assurance (AA), including:
 - Age verification (AV)
 - Age inference
 - Age estimation (AE)
 - Parental controls
 - Parental consent
- This is when they are used for the following age gates:
 - 18+ age gate
 - 16+ age gate
 - 13+ age gate
- Out of scope:
 - Exact age
 - 13-16 age range (as this is covered by the gates above)

Evaluation Proposal: Assessment Criteria

1. **Accuracy:** how well the technology can detect a user's age. Assessing the variance of accuracy across different environmental conditions and contexts
2. **Interoperability:** how well the technology can be used across multiple online platforms
3. **Reliability:** how consistently the technology can produce the same result
4. **Ease of use:** how simple the technology is to operate
5. **Minimisation of bias:** how well the technology avoids racial or other bias, recognising that the complete elimination of bias is unattainable
6. **Protection of privacy:** how well the technology protects users' personal information

Evaluation Proposal: Assessment Criteria

7. **Human rights protections** i.e. accessibility for all users, including people with disabilities, as well as applicable rights under the UN Convention on the Rights of the Child
8. **Data security:** how well the technology safeguards users' personal information from unauthorised access, breaches or theft through, for example, the use of security by design principles and resistance to presentation attacks
9. **Circumvention:** Resistance to certain kinds of attacks – Clause 9 of ISO 27566-1, including Biometric Presentation & Spoofing Attacks
10. **Technology Readiness Level (TRL):** TRLs enables consistent, uniform discussions of technical maturity across different types of technology. TRLs are based on a scale from 1 to 9 with 9 being the most mature technology

Evaluation Proposal: Effectiveness/Quality criteria test coverage

Test Approach \ Quality Criteria	Automated Tests	Manual usability & acceptance tests	Manual functional tests	Static reviews	Presentation Attack Detection
Accuracy	✓	0			
Interoperability			✓	0	
Reliability	✓				
Ease of Use		✓		0	
Minimisation of bias	✓	0			
Protection of privacy				✓	
Human rights protections				✓	
Data Security				✓	
Circumvention				0	✓
Technology Readiness				✓	

✓ = Primary 0 = Secondary

Comments in the meeting (added afterwards)

Comment	Discussion
<p>The document gives the impression that only primitive presentation and injection attacks will be tested, which does not reflect the level of sophisticated attack that is becoming more widely accessible</p>	<p>We will amend the document to include attacks likely to accessible to Australian children today, and note the need for all methods to continuously manage their defences</p>
<p>The evaluation does not include assessment against a number of formal pieces of guidance operating in Australia e.g. eSafety Safety By Design, AI and Cybersecurity guidance</p>	<p>The trial will not duplicate conformity assessments for this related guidance but will consider if methods in the trial would face a general problem complying with such standards</p>
<p>The evaluation gives the impression it will only test using people aged 12-34. Usability is an important issue for older people.</p>	<p>We will clarify that the younger age range only relates to testing the accuracy of the methods in the trial and inclusivity and accessibility will also be considered</p>



Comment	Discussion
<p>Given that the AA technology will be used to assess Australians, it seems odd to me that there is no requirement for technology to be assessed against the Information Security Manual (ISM) i.e. to have completed an Information Security Registered Assessors Program (IRAP) assessment. I note that there is discussion about the ISM, however there is no specific requirement for assurance against it.</p>	<p>The document will be amended to add consideration of other related guidance, but not to include conformity assessment against those requirements as this is not required for the objectives of the trial</p>
<p>I would have thought that it would be prudent to identify whether or not the AA technology utilises artificial intelligence and if so for what functions. It also seems odd to me that there is no requirement to implement the Australian Government's AI assurance framework for AA technology that utilises AI.</p>	<p>The document will be amended to add consideration of other related guidance, but not to include conformity assessment against those requirements as this is not required for the objectives of the trial</p>
<p>For each AA technology, it would be useful to understand what mechanisms are in place to ensure an individual is not continually rejected. In other words, if a person is falsely rejected and then prove their age, how is this recognised so they are accepted in subsequent age verification challenges (and don't have to continually prove their age)?</p>	<p>This is a wider system question, applicable to “successive validation”.</p> <p>Interoperability may also be a feature of the trial</p>

Comment	Discussion
<p>There is no provision for assumed identities i.e. legal circumvention. An example is the police who pretend to be 13 or 14 year old online.</p>	<p>This is not in scope for the trial but is being discussed within government</p>
<p>The sample size of 1067 specifies 384 in each sub-group - what are the sub-groups? Is this 18+, 16+ and 13+ or is this something else e.g. ethic groupings. Also wondering what demographics have been considered apart from ethnicity e.g. disability.</p>	<p>The breakdown and specification of the sample is being worked in as part of Work Package 4 – Evaluation Activity</p>
<p>The 4.6.2 Infrastructure requirements should specify the use of IRAP assessed environments for Azure, AWS and Google cloud platforms.</p>	<p>KJR implement the ‘Essential Eight’ cyber threat mitigation strategies as recommended by The Australian Signals Directorate (ASD)</p>
<p>The 4.6.2 Security Features seem light on and inconsistent with prior statements about conformance with Information Security Manual (ISM) and ISO27001. This should be prescribed in terms of assurance against recognised assurance frameworks and ideally ISM (given its application to Australian citizens).</p>	<p>The document will be amended to add consideration of other related guidance, but not to include conformity assessment against those requirements as this is not required fo the objectives of the trial</p>



Comment	Discussion
<p>I am a little confused about the application of avatars, non-human testing and automated testing - whilst I understand these for testing failure and for detecting adversarial attacks (or PADs) I'm not sure what this means for testing success i.e a real human of acceptable age. By definition, if a synthetic person passes AA tests then the AA is readily circumvented.</p>	<p>The circumvention criterion (including PAD) is the one that addresses the synthetic person case and testing for it must be isolated from testing for other criteria. The test types mentioned are required to achieve sufficient test coverage in success cases.</p>
<p>I note 4.8.4 suggests augmenting requirements with frameworks for human rights and ethical design - it would be good to know what these are and to see them incorporated as requirements</p>	<p>This is addressed in Section 4.5.8, items 1, 2 & 3. An example framework we have referenced is the <i>UN Convention on the Rights of the Child</i>.</p>
<p>There is no mention of eSafety's Safety by Design principles which should be incorporated as requirements - I am not sure that technology suppliers will appreciate these being embedded in the already mentioned BOSE, etc.</p>	<p>The document will be amended to add consideration of other related guidance, but not to include conformity assessment against those requirements as this is not required for the objectives of the trial</p>



Comment	Discussion
<p>Page 6: Other child protections measures include parental consent and parental controls</p> <p>Australian Schools also deploy safety technology onto devices that kids use at school and at home. This is particularly so in private, independent and catholic education. In these instances the school is activating as the verifier of age, which is very helpful</p>	<p>Noted</p> <p>We have had an EoI from at least one pr which may leverage the role of schools. Other participants may do so too</p>
<p>I was in Florida last week which is a jurisdiction which requires age verification to access porn sites.</p> <p>I got my team to test it while I was there and accessing porn is extremely easy via going to Reddit and X and literally thousands of other porn domains.</p> <p>All they seem to have done is impede the main porn sites Pornhub and Xvideos.</p> <p>I raise this because the ability to control access to an online platform is one thing but to be able to properly age-gate the entire internet for a particular content type is actually what we're trying to achieve. I'm not sure how that is addressed in the Evaluation or report to Government.</p>	<p>This is outside of scope for the trial as it is a policy matter.</p> <p>For information, Florida's law HB3 is only partially in force for websites with more than 1/3 pornographic content. The social media element has not yet been implemented.</p> <p>Pornhub is geoblocking IP addresses registered in Florida.</p>

Terms of Reference



Terms of Reference – suggested edits

Objectives

- Represent Stakeholders: Ensure diverse stakeholder interests are considered, including government, industry (providers, intermediaries and relying parties), academia, civil society and consumers, **including children and young people under the age of 16.**

Roles and Responsibilities

- Board members will:
 - **Seek to apply an evidence-based approach to their deliberations**

Confidentiality and Ethics

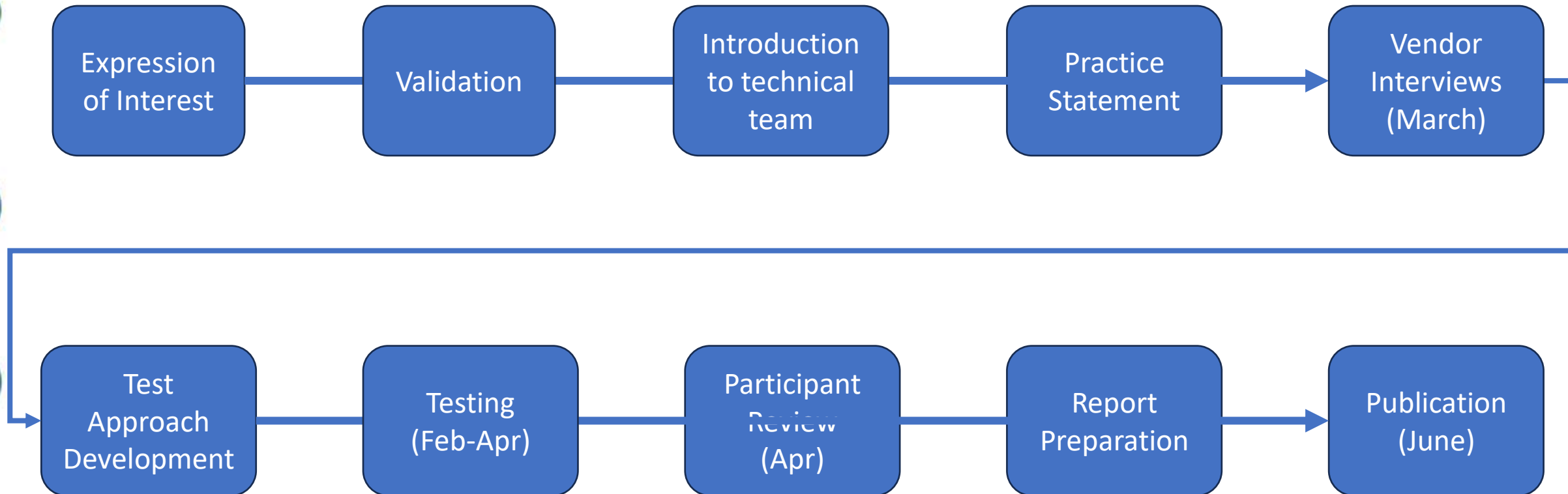
- ~~• Members must declare any potential conflicts of interest beyond their representative role and adhere to ethical standards in their advisory capacity~~
- **Members must declare any actual or potential conflicts of interest in relation to their role on the Advisory Board and must adhere to ethical standards in their advisory capacity.**

Ethics update

- Conflict of interest declarations due by 31 January
- Reviewed by the Ethics Committee
- Conflicts then published on project website

- Stakeholder Advisory Board not required to declare conflicts given one purpose of the board is to represent conflicting interests, but we encourage transparency in your biographies on the website.

Overview of the trial process





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