



Age Assurance Technology Trial

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Stakeholder Advisory Board Minutes

29/01/2025

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Minutes of the Second Stakeholder Advisory Board Meeting held Via Teams on Wednesday, 29 January 2025, at 9 am AEDT

In Attendance:

Professor Jon Rouse APM	Chair
Iain Corby	AATT Engagement Lead
Becky Burgess	AATT Engagement
George Billinge	Illuminate Tech
Tim Levy	Qoira Limited
Jenny Duxbury	INK & Digi
Tony Allen	ACCS
Ajoy Ghosh	Cyber Alchemist
Kirra Pendergast	Safe on Social
Maree Crabbe	It's Time We Talked
Cheryl Seeto	Meta
Melinda Tankard Reist	Collective Shout
Colm Gannon	ICMEC
Deborah Young	RegTech
Ben Au	Snap
(Observers) Julie Inman Grant Ainsleigh Hawke Chloe Bennett Kathryn King Heidi Snell	e-Safety
Andrew Hammond	AATT Deputy Project Director
Amber Hawkes	Blue Lantern Consulting
Susan McLean	Cybersafety Solutions
Peter Violaris	IDVerse
Yvette D'Ath	Independent
(Observer) Waheeduddin Jayhoon	Aus Government



Apologies:

Conrad Townson	IFYS
Campbell Wilson	Monash University
Amanda Third	Western Sydney University
Carol Ronken	Bravehearts

1. Introductions

Professor Jon Rouse welcomed the participants and explained the housekeeping rules, reminding everyone to respect the varying views of each other. They all gave brief introductions. Iain expressed his disappointment that David Cooke from Aylo had removed himself from the Advisory Board, due to his concerns that his presence may stifle views.

2. Project update

Iain informed the board that there had been 38 expressions of interest so far. Efforts were being made to ensure a broad range of age assurance solutions were represented, and meetings were being held with participants to bring them on board. There was a discussion about filling gaps in representation, including reaching out to companies like Samsung (who had previously written to express their interest) to explore device-based solutions. The goal of the trial was to comprehensively evaluate a large variation of age verification solutions for the government and regulators.

There was a question about whether the expressions of interest were still open. It was clarified that although there was an initial deadline, applications would still be accepted on a discretionary basis to ensure a comprehensive range of solutions. It was noted that the trial website was where companies can still submit their expressions of interest, however, to attain a firm deadline of the end of June, a deadline would have to be imposed.

A suggestion was made by Colm that late applicants should provide additional documentation following a specific framework to help evaluate their suitability for the trial. It was noted that the initial process was kept simple to encourage participation, but the next stage would involve a more rigorous evaluation, which would naturally filter out less viable proposals.

The diversity of the solutions submitted was discussed, including whether there were entries from various industries such as social media, finance, and app stores. Iain explained that efforts had been made to engage a wide range of providers, and that outreach had been ongoing since the initial event in Canberra.

Questions and comments about the approach of the trial

In Asad's absence, Drew gave an update on efforts that went into compiling the document, particularly over the Christmas break. The document extensively covers legislation and rules regarding age verification and the associated regulatory changes.

Andrew mentioned that the team has been considering the representation of underrepresented demographics, particularly First Nations people. A partner has been involved from the outset to ensure that First Nations perspectives are integrated into the trial process. The execution of the trial, including hands-on testing, was also discussed, with a focus on addressing potential challenges faced by individuals who may not possess mainstream forms of identification.



Work has been conducted with a school that has a 96% Indigenous student population to build confidence in the trial and to navigate parental engagement, consent processes, and opt-out mechanisms.

Discussions covered the demographic analysis undertaken to ensure a representative sample of the Australian population. It was explained that census data from 2021 had been used as a basis to determine the ethnic and ancestral composition of participants in the trial. The trial will involve a statistically significant sample size of approximately 1,100 participants, with a spread of ages ranging from 13 to 23. Subgroups will be structured within the sample to ensure inclusivity and diversity, reflecting Australia's broader population demographics.

Andrew provided an update on the engagement with participants who have registered expressions of interest. The response has been positive, with participants expressing enthusiasm for being part of the trial. The initial planning stage is underway, focusing on the practical implementation of software testing, onboarding participants, and capturing results effectively.

Andrew explained the methodology for evaluating the software. The approach involves treating each provider as if they were being onboarded by a company seeking age verification services. Providers will follow their standard onboarding procedures, including documentation, APIs, and software integration.

A question was raised in the chat regarding the minimum age for testing, Andrew clarified that while most participants would be 13 and above, a small number of younger participants might be included where feasible.

Jenny inquired about the upper age limit for the trial, which was confirmed to be 23 years. Andrew explained that 23 was selected based on regulatory relevance and comparisons with international standards. Jenny raised concerns about including older age groups to assess usability. Iain clarified that the trial focuses on estimation techniques for key legal ages but agreed usability concerns should be noted. Ben supported Jenny's point and shared his personal experience of being asked for ID into his late 20s and early 30s. Colm Gannon emphasised that the focus is on reliability, ethics, and privacy rather than usability at this stage.

Discussion on whether the document fully addresses usability testing. Iain assured the group that ease of use is part of the evaluation criteria and within the trial's scope.

Cheryl asked whether the evaluation criteria would differ between commercial (third-party) and proprietary (in-house) solutions. Iain clarified that all solutions will be assessed equally, ensuring a fair evaluation.

All comments were noted and would be considered by the team.

Comments on the Evaluation Proposal

Iain acknowledged the comments submitted in advance. The first comment from Ajoy was discussed. Ajoy had raised concerns about Australian-specific standards, including cybersecurity and artificial intelligence regulations. He suggested that while the trial may not need to certify



providers under all Australian standards, it would be beneficial to assess how prepared and willing companies are to comply with them. He highlighted that software development approaches significantly impact the ease of obtaining certification.

Iain acknowledged the point, agreeing that while compliance with local regulations is important, the primary goal of the trial is to evaluate the effectiveness of age assurance methods rather than implementation challenges. However, he noted that if a method proves effective, but the provider cannot comply with Australian regulations, it would be impractical to pursue.

Tony commented via chat, stating that "Security by Design" is included in the ISO 27566 standard, which serves as the core framework for the trial. Iain confirmed that while this ISO standard covers general requirements, it does not specifically address Australian regulations.

The next comment was around the use of artificial intelligence. Iain mentioned that machine learning is a subset of AI and has traditionally been a focal point before AI became widely recognised. Ajoy noted that while there are no specific measures related to AI compliance, general security and assurance requirements must be met. He suggested revisiting the issue alongside other key concerns. Andrew added that although there are currently voluntary guardrails in place for AI in Australia, there are no mandatory regulations yet. He acknowledged that assurance and oversight are ongoing, and developments in AI safety will continue to be monitored.

Iain commented on the issue of repeated age verification failures, asking how falsely rejected users could ensure they are correctly verified in future challenges. Andrew said that from discussions with providers, some offer age tokens that can be used across multiple sites, referencing back each time. Providers are working on mechanisms to clear and reissue tokens upon verification of age eligibility. He also highlighted that from a procedural standpoint, there might be challenges if a user's behaviour does not align with their verified age. Testing would be conducted to evaluate these cases, ensuring systems can adapt to changes in user eligibility over time.

Iain suggested that regulations should consider diverse populations and provide fallback options, such as professional vouching, to prevent individuals from being excluded. Iain questioned whether successful verification could lead to the creation of a reusable digital identity.

Colm commented on age tokens, mentioning double-blind transmission and how it had been carefully considered in the documentation. He mentioned that this aspect would be reviewed during the testing phase. Iain acknowledged Colm's contribution.

The next comment was on law enforcement's use of assumed identities for investigations. Jon confirmed that there are legal provisions supporting law enforcement in this area and that it falls outside the trial's scope.

Julie noted that law enforcement agencies had raised the issue before, and while it might not be within the trial's parameters, it could become relevant in implementation. Jon reiterated that these operations are covered under existing legal frameworks.

Iain commented on sample sizes and their adequacy for testing different subgroups. He acknowledged the need for representative sampling and deferred to statistical experts.

Tony explained that a 5% margin of error was the target for testing, with a maximum of 20% in subpopulations, ensuring no misleading conclusions would be drawn from small sample sizes. He assured that any data exceeding the 20% threshold would not be considered reliable.

Iain talked about circumvention testing and the challenge of evaluating security against deepfake and presentation attacks. Peter expressed concerns about the proposal's emphasis on "low testing" in this area, arguing that the report should clarify the testing process rather than downplay its scope. Tony responded that deepfake and injection attacks are still evolving issues and that another project in collaboration with Swiss researchers was actively exploring them (Project DefAI). He assured that additional circumvention tests were being conducted, though some details would not be publicly disclosed. Peter appreciated the response but urged for more transparency in the report to avoid criticism from sceptics.

Peter said that advancements in deepfake technology have made sophisticated attacks more accessible, highlighting the need for stronger assurances in the report. Iain agreed to incorporate these concerns into the final draft.

Julie said that age assurance providers should conduct risk assessments to ensure their technologies do not inadvertently harm young users. George noted that while safety-by-design principles were aligned with the trial's ethical framework, they were not explicitly mentioned in the report and should be integrated. Ajoy acknowledged that his previous comments touched on the distinction between in-house and third-party providers, with Julie emphasising that both should adhere to best practices.

Julie noted the importance of managing public expectations, particularly among parents and educators, that age verification alone does not eliminate the need for digital literacy efforts. George agreed, highlighting the opportunity to use the trial to educate children about their online rights and responsibilities.

Tim commented on the inefficacy of age-gating of pornography in Florida, stating that their implementation had almost no impact on children's ability to access adult content. Iain clarified that Florida had only partially implemented age verification, focusing on the main porn sites only, which explained the results.

Maree complimented the authors of the report for their thorough approach but raised concerns about public trust in the project. She highlighted that while research supports strong public backing for age verification, negative opinions about privacy and security risks could undermine confidence. She suggested a proactive communication strategy to address these concerns. Iain agreed, but emphasised its role in impartial testing. Jon encouraged board members to use their voices in shaping the public narrative while maintaining transparency.

Julie mentioned the importance of good communication amongst the board and the Trial team.

Iain thanked the board for their contributions and acknowledged the importance of ensuring that diverse perspectives were represented, which he felt had been.

ACTION: Add the responses from the feedback into the slides before they are sent round to the SAB.



Ethics Update

George provided an update on impartiality, ethics, and data protection in the trial. Key deliverables, including child safeguarding, privacy impact assessments, and ethical data collection protocols, will be published soon. A conflict of interest register is in place, and an ethics handbook has been developed using international frameworks. The team is also applying the AIATSIS Code of Ethics for Indigenous research. The trial is shifting from design to implementation, with major work planned in Sydney. Updates will be available online, and further discussions will take place in the next meeting. Members of the board were encouraged to contact George if they have further questions.

Terms of Reference

Minor updates to the Terms of Reference were discussed, including child inclusion, evidence-based discussions, and conflict of interest transparency. Andrew confirmed the comments received have been reviewed and noted.

Future meetings are scheduled for 14 March (Teams), 22 April (hybrid, Sydney), and 25 June (hybrid, Canberra), with conversation encouraged between meetings.

Overview of the trial process

It was noted that testing will commence soon, with all participants included in the final report. Concerns were raised about evaluating non-performing solutions transparently without naming them. It was explained that all participants must agree to Trial terms before proceeding. The impact of the upcoming federal election was highlighted as a factor to monitor.

AOB

Iain reminded the board to check they are happy with their biographies that are on live the website.

Colm asked for a copy of the ethics handbook. George confirmed that the handbook would be published on the website soon.

Andrew thanked participants for joining and encouraged members to contact him between meetings if they have further questions.

Meeting adjourned at 10:37am