

Age Assurance Technology Trial

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Stakeholder Advisory Board Minutes

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Minutes of the Forth Stakeholder Advisory Board Meeting held in Sydney and Teams on Tuesday, 29 April 2025, at 11:30 am AEDT

In Attendance:

Professor Jon Rouse APM	Chair
Iain Corby	AATT Engagement Lead
Melissa Stevenson	Scout Insights
Mark Dunphy	
Peter Violaris	UX Law
Nicola Elkin	ACCS
Ben Au	Snap
Ajoy Ghosh	Cyber Alchemist
Melinda Tankard Reist	Collective Shout
Tim Levy	Qoira Limited
Tony Allen	AATT Project Director ACCS
Susan McLean	Cybersafety Solutions
John Pane	EEF
Yvette D'Ath	Independent
Cheryl Seeto	Meta
Conrad Townson	IFYS
Colm Gannon	ICMEC
George Billinge	Illuminate Tech
Nolan Noeng	e-Safety (Observers)
Rebecca Cotton	
Andrew Hammond	AATT Deputy Project Director
Amber Hawkes	Blue Lantern Consulting
Deborah Young	Independent
Amanda Third	Western Sydney University

Apologies:

Maree Crabbe	It's Time We Talked
Jenny Duxbury	INK & Digi
Kirra Pendergast	Safe on Social
Carol Ronken	Bravehearts
Simon Callaghan	RegTech
Campbell Wilson	Monash University
Ron Curry	IGEA



1. Welcome and Opening Remarks

John Rouse (Chair) welcomed all participants to the fourth meeting of the Stakeholder Advisory Board for the Age Assurance Trial. He noted the strong attendance despite travel disruptions. Quorum was confirmed. John Rouse asked for confirmation of the minutes from the previous meeting. No amendments were suggested, and the minutes were approved without objection so can be published on the website.

Roundtable introductions of all in-person and online participants were conducted.

Iain Corby provided updates on follow-up correspondence with Amanda regarding prior feedback. He also noted that a comprehensive follow-up email had been sent covering outstanding queries. He encouraged participants to revisit and raise any points from the last meeting that they felt had not yet been fully explored.

2. Ethics and Child Safeguarding Update

George Billinge provided a detailed update on ethics and safeguarding. He reported that the mid-project impartiality report had been completed, identifying two new risks. The first was the relationship with E-Safety Australia, which led to the signing of a Memorandum of Understanding to establish clear boundaries. The second was transparency in vendor selection; guiding criteria for selecting vendors were introduced to ensure fairness, such as technical readiness, uniqueness of solution, and integration time.

The child safeguarding protocol was drafted based on international frameworks and the Lundy model of child participation. It includes harm indicators, reporting channels for each Australian state/territory, and clear methods for school and parent engagement and consent.

Colm Gannon asked whether there was a separate education stream for parents. George confirmed that explainer videos and resource packs were provided to parents, along with direct contact options for further queries. Colm then suggested that parent FAQs be published on the website to reduce repeated questions and demonstrate due diligence. George agreed that the team would consider this suggestion.

George also noted that a Schools Information Pack had been published on the [website](#), providing high-level information that schools receive when first contacted to participate. In addition, reports from each engagement event are being produced to document the feedback and outcomes of school-based activities. These reports capture valuable insights into how children are engaging with and responding to the technologies under trial.

Susan McLean inquired whether all schools had been locked in for participation, how many schools were involved, and whether there was diversity in types of schools. Nicola responded that provisional testing had begun at two locations, with approximately nine schools targeted. These schools are geographically and demographically diverse across Australia and include both public and private schools with students in Years 7 to 12.

Susan further asked whether there was room for more schools. Nicola replied that possibly there was room, but time and logistics were constraints. They remain open to additional schools. Colm



Gannon asked whether withdrawals and conflicts of consent between parents and children were being recorded. George Billinge said that no formal recording for that purpose was planned; incidental records may exist, but the focus was strictly on technology testing. He noted that follow-up research might be better suited for such questions.

Melinda asked whether the sample size of 1086 participants was typical for age verification trials globally. Iain and Tony Allen responded that this is the first age verification trial globally. The sample size was statistically justified to achieve confidence levels and margins of error, with calculations led by Professor Toby Walsh.

Melinda also inquired about what demographic data was being collected on the children. Nicola clarified that minimal, non-identifiable data is collected, such as month and year of birth and cultural background, but not names or addresses.

Conrad Townson raised the issue of whether data on parent-child consent conflicts would be relevant to understanding circumvention risk. He highlighted that parents can sometimes assist children in bypassing age restrictions, and suggested that recording instances where there is a conflict of consent, for example, where a parent consents but the child does not, or vice versa, could provide valuable insights into future enforcement and application of age assurance systems.

Others supported Colm Gannon's earlier point, agreeing that collecting data on non-consent and circumvention behaviours could be useful. George Billinge agreed the point had merit but confirmed that it falls outside the current trial's scope, which is focused solely on technical testing of age assurance technologies.

Tony cautioned that collecting data simply because it "might be useful" is not good research practice and emphasised that data collection must align with the trial's defined objectives. He noted that other strands of the government's age assurance analysis are designed to explore such issues more thoroughly and quantitatively.

Tim Levy shared his industry experience, noting that in practice, parental circumvention often happens when children pressure parents into bypassing restrictions. He doubted this trial would fully reflect such real-world scenarios.

Iain acknowledged the relevance of the discussion and said the team would consider what information, if any, could be gathered within the trial's boundaries that might prove useful.

Colm reiterated that any relevant information incidentally collected should be made available to future researchers to support wider understanding of social attitudes towards age assurance.

George confirmed his priority is ensuring children's rights and views are respected throughout engagement and agreed it was helpful to have these considerations flagged for reflection.

Nolan Noeng concluded by noting that the Department of Communications had already commissioned separate research through the Social Research Centre to examine consumer and parental attitudes. This research has been finalised and will be publicly released in due course.



3. Trial Update

Iain provided an update on the overall progress of the trial so far. He reported that while the trial had attracted a strong level of interest, not all vendors had yet submitted their required practice statements. He noted that these statements are essential, as they document in detail what each participating vendor claims their system does and form the basis for the testing and auditing process. Iain noted that while some practice statements had been received and were under review, there was an emerging possibility that not all initially interested vendors would complete this step, leading to a degree of self-selection as the process progressed.

Tony provided an update on the vendor interview process, which runs alongside the collection of practice statements. He confirmed that the window for new participants to apply had now closed, due to the time constraints associated with the testing schedule. At this stage, 53 vendors had expressed formal interest in participating, although a few were expected to drop out. Reasons for withdrawal included time pressures, resource limitations, and in some cases, difficulties in formalising a clear description of their product offering. To date, 16 vendor interviews had been completed, with many more scheduled over the coming weeks. Both the practice statements and interview summaries will be published as part of the final trial report, ensuring transparency about what each vendor has claimed and how their technologies have been assessed.

Iain asked Tony whether, based on these interviews, the claims made by companies in their practice statements were generally being supported by what was emerging in the discussions. Tony confirmed that, so far, they had not found any major discrepancies. For vendors whose products are already available on the market, the statements had broadly been fair and accurate reflections of the system capabilities. He noted that it tended to be more challenging for vendors with early-stage or still-developing technologies to articulate precise claims.

Andrew then gave an update on the physical (lab-based) testing underway. He demonstrated how the testing framework operates and how the results from the tests are visualised and recorded. This includes structured testing against each participating vendor's system, using both standardised and negative test scenarios (such as attempts to spoof the system). The anonymised results allow the team to assess how each system performs and to compare accuracy across different solutions.

The question was raised of whether the testing would enable them to identify which technologies performed better across different cultural and ethnic backgrounds, given that some age assurance technologies are known to vary in accuracy depending on demographic factors. Andrew responded that this was an important consideration and explained that the evaluation proposal had already anticipated this issue. The participant pool has been designed to align with Australian Census demographics, and data is being gathered to ensure sufficient representation of various cultural and ethnic groups. This approach will allow the team to identify, where relevant, how different systems perform across diverse cohorts. He also noted that the team would actively monitor participation during testing to address any underrepresented groups to ensure robust data for analysis.

4. Schools Testing Update



Nicola reported on school testing progress. Agreements had been secured with schools across WA, ACT, NT, NSW, QLD, and VIC. Parental consents were managed via Consent2Go and other resources. Engagement included Q&A sessions with parents and distribution of explainer videos.

A question was raised about why students were being asked questions about topics such as bullying and online safety in the pre-test briefing. Nicola responded that these discussions were included to ensure students understood the purpose of the technology being tested and the broader context of online safety. She emphasised the importance of engaging with children meaningfully, so they were not simply participating in an abstract technical exercise but were informed about why the testing was happening. Nicola made clear that no student was required to respond if they felt uncomfortable, and participation in these contextual discussions was entirely voluntary.

A comment followed that, while the rationale for providing context was appreciated, there was concern about inadvertently introducing politically sensitive topics. It was suggested that the benefits of the technology should be carefully counterbalanced in such discussions to avoid the perception of political messaging. Iain agreed and stressed that the team did not want children to feel like "rats in a lab." Providing context was important, but no political line was being taken. He acknowledged a suggestion from another participant that a better approach might be to allow children to lead the discussion more naturally, rather than having adults direct it too formally.

A question was asked about whether the team had a provision in place for situations where a child might disclose something of concern. Nicola confirmed that a safeguarding policy was in place, which George had previously briefed the group on, and that each school had an appointed safeguarding lead. When asked whether any disclosures had actually occurred, Nicola reported that there had been one instance where a child mentioned having had a negative experience online, but no further details were given, and it did not escalate.

Colm sought clarification to ensure that children were not being explicitly asked open-ended questions about sensitive issues, such as inappropriate sexual contact online. Iain reassured the group that this was definitely not the case. Nicola noted that in one school, a more general discussion about online experiences had taken place beforehand to "set the scene," and Andrew explained that this was intended purely to provide background context.

Iain reiterated that while procedures were in place to respond to any disclosures, the team was not actively seeking or soliciting sensitive information from children. It was confirmed that teachers would be present throughout all testing sessions and that schools' existing safeguarding policies would apply alongside the trial team's protocols.

A follow-up question sought clarification on whether students were explicitly asked about bullying. Nicola apologised for any misunderstanding and explained that it was not a formal line of questioning but rather part of a general, voluntary discussion about online life. The relevance of such discussions was queried, and Tony clarified that these conversations took place in a school setting, with teachers present, and aligned with the school curriculum. He described the trial as offering a practical learning opportunity for students to engage with concepts they were already covering in class. He confirmed that while the trial team was safeguarding-trained and would pass on any concerns to teachers, the trial team itself would not be formally capturing or storing sensitive disclosures; that kind of data collection belongs to other projects.



Iain agreed that framing these discussions carefully was essential to avoid "opening a can of worms" unnecessarily. He emphasised that the team was mindful of entering sensitive environments and that great care was taken to pose questions in a way that was clear, beneficial, and proportionate.

Action: School testing team to define a core script to use when introducing the sessions

Iain also mentioned a recent meeting he had with representatives from the eSafety Commissioner's office, where it was confirmed that an international panel of academics had been convened to conduct a comprehensive evaluation to inform the Social Media Act. He noted that this is a high-profile, internationally significant area of research, and the world is watching how Australia implements age assurance and online safety regulation.

A participant voiced criticism of what they perceived as the trial team's instincts around engaging with children and online safety, expressing concern that the opportunity to gather valuable insights might be wasted. Tony responded by noting that, in his experience, the children were thoroughly enjoying their participation in the trial and that it was proving to be a valuable educational opportunity.

Ajoy Ghosh asked about whether the trial was collecting data on circumvention (i.e., ways children or parents might attempt to bypass the age assurance technologies). Andrew confirmed that there was no intention to collect such data within the school testing environment, but aspects of circumvention were being explored in other parts of the trial, particularly in the lab testing stream. He assured participants that circumvention risks were being taken seriously and were accounted for in the broader evaluation.

John Pane raised a concern about bundled consent, where multiple consents (e.g., for demographic data and participation) are grouped together rather than handled separately. John also raised the question of why separate, express consent was not being sought when soliciting information about ethnicity and First Nations status. This is defined as "sensitive information" under the Privacy Act and requires express consent for its collection, use and disclosure. There was general consensus in the room that the approach to consent should be reviewed and confirmed by the project's legal team.

ACTION: Iain agreed to consult the trial's legal advisors again on this point.

Tony added that although the trial was not collecting personally identifiable information (PII), it would be prudent to confirm this with the legal team to ensure clarity and compliance. It was agreed that this would be followed up.

Nicola then gave a presentation on the consent-gathering process used in schools, including a demonstration that featured her daughter's participation to illustrate how consent is requested and managed. During the discussion, it was asked whether "country of birth" was being used as a proxy for race. Andrew responded that country of birth data was collected because it is what the Australian Census collects, and Tony elaborated that understanding how skin tone affects the accuracy of certain technologies (e.g., facial analysis) is important, as light reflection can impact results.

A follow-up question asked whether a child could refuse to answer the question about their parents' country of origin. Andrew confirmed that they could opt out of answering that question.



Concerns were also raised about the visibility of school logos on uniforms in testing photos. The team acknowledged this and agreed to consider feedback on ways to minimise the visibility of uniforms in images. Iain clarified that in a typical age assurance solution, photos are deleted almost immediately after use and that, in most cases, only the face is captured, not the full body or uniform. A further clarification was sought to confirm that the trial was testing a variety of technologies, not just camera-based systems, and that parental choice over technology types was not being considered as part of this trial. Nicola and Iain confirmed both points and noted that, due to the time constraints of the project, parental choice is outside the scope of the trial's design.

A discussion followed around the potential for spoofing technologies using photos. Nicola explained how many systems include liveness detection to prevent static images from being used to deceive the system. Tony elaborated on the methods used during lab testing to verify that systems cannot be tricked by photos.

There was also a discussion about the accuracy of age estimations. Iain explained that, in most commercial deployments, providers do not disclose the exact estimated age to the user but instead provide an age range or a simple pass/fail result.

Nicola concluded by summarising the key takeaways and challenges encountered during school testing so far. This included high levels of student engagement, strong relationships with schools, and minor technical and procedural refinements based on early feedback.

Amber Hawkes raised a question about transparency and data handling. She asked whether participants, particularly parents and children, were being clearly informed about how their data would be handled by each of the technology providers involved in the trial. Amber noted that different vendors have varying data practices, particularly around image retention and storage, and emphasised the importance of participants understanding these differences to ensure fully informed consent.

Tony responded that all participating vendors had been required to submit detailed practice statements outlining their data handling practices, including how data is processed, stored, and deleted. He assured the group that any vendor whose practices did not comply with Australian privacy law was excluded from the trial. Tony explained that the trial team had reviewed all vendor documentation to confirm compliance and ensure all solutions tested met strict privacy and data minimisation standards.

Amber followed up, asking whether this information was being clearly communicated directly to parents and children, rather than handled solely internally. Iain clarified that participant-facing materials, such as explainer videos and information packs, conveyed the overarching privacy protections in place, but did not detail the practices of each individual vendor, given the number of technologies involved. He stressed that all data captured during testing was anonymised, used only for that specific test, and deleted immediately afterward. No personal information, such as names or addresses, was linked to test results in schools. Iain acknowledged the value of Amber's point and said the team would reflect on how future communications could make these assurances even clearer. He reaffirmed that participant privacy and data rights were fully protected throughout the trial and that vendor compliance was actively monitored.

Action: Iain to pass this suggestion to the technical team

A question was also raised about whether the trial had ensured enough representation of children just below the age of 16, which is particularly relevant to social media access. Iain reminded the



group that the trial is not limited to the 16-year-old threshold and that the testing covers a broad age range. Nicola, Iain, and Andrew all confirmed that they were confident they had achieved sufficient representation across relevant age groups.

1. Mystery Shopping Update

Melissa Stevenson from Scout Insights introduced the next phase of the human testing: the mystery shopping exercise. She explained that while fieldwork had not yet commenced, the lessons learned from the school testing phase would inform the methodology and question design for the mystery shopping work. Melissa emphasised that Scout Insights specialises in complex, sensitive research projects and holds relevant credentials such as Working with Children checks.

She clarified that interaction with children during this phase would be minimal and would primarily involve parents. Scout Insights maintains a national panel of 12,000–18,000 registered participants, which is regularly refreshed. Participants for the mystery shopping work would be selected from this panel, clarifying they would not be employees or their children.

Melissa noted that while the mystery shopping would mostly follow the school testing phase, there could be some overlap due to earlier delays (such as weather-related disruptions). She emphasised the importance of collaboration with the broader team, including Nicola and Drew, to refine the questioning approach.

Iain added that additional usability testing with older participants would complement this phase, ensuring that the technologies are accessible not just for tech-savvy youth but also for older adults.

2. Vendor interview update

Tony provided a brief explanation of the overall purpose of the Trial, emphasising that its role is to objectively assess the efficacy and performance of a range of age assurance technologies, without endorsing or recommending specific solutions. He reported that the team had commenced the process of self-challenge, an internal review exercise designed to rigorously test and scrutinise all emerging observations to ensure that findings are robust, evidence-based, and aligned with the trial's scope. However, Tony noted that this process was still at an early stage, and as such, the team was not yet in a position to share further information or preliminary findings at this time.

A question was raised about how the trial's independence is maintained and whether the government actively checks to ensure the project remains within its intended scope. Tony responded that the government was satisfied with how the trial was being conducted so far. He explained that although the trial is funded by the Department of Communications, the trial team operates independently, with a clear remit and methodology agreed upon at the outset. Regular meetings and reporting back to the Department ensure transparency, and accountability is maintained through published materials and open engagement with stakeholders such as the Advisory Board.

Tony acknowledged that the project was slightly behind schedule and outlined the reasons for this. Factors included delays caused by weather disruptions affecting school testing and logistical complexities in managing vendor participation and testing streams. He assured participants that efforts were being made to catch up and to complete the testing and reporting phases as soon as possible.



A question was asked about whether the timeline of the trial remained in step with the Children's Privacy Code and other related regulatory efforts. Tony replied that he was not entirely certain of the alignment, noting that the situation was affected by the timing of the federal election and associated caretaker period. The board asked whether the trial team was liaising with those drafting the Children's Privacy Code to ensure the findings of the trial could inform their work. Iain clarified that the trial's role was to test the functionality and efficacy of different age assurance technologies, not to recommend specific solutions. However, he reassured the group that the trial team had been transparent and proactive, meeting regularly with both the OAIC and the eSafety Commissioner to keep them informed of trial progress and emerging findings.

1. Interim Reporting

A further question was asked about the interim report, specifically noting that it had been previously stated in earlier meetings that the interim report would be made public. Ben asked whether the Stakeholder Advisory Board could receive a copy. Tony explained that the decision not to release the interim report had been his, made in the context of the election period and a desire to avoid confusion or premature dissemination of incomplete findings. He confirmed that while the interim report itself would not be released at this stage, the structure, overall analysis, and emerging findings would be shared with the Board at the next meeting.

It was noted that several meetings ago, the Board had been told they would see a copy of the interim report. Tony acknowledged this but reiterated that the report was not yet ready and that he remained mindful of the sensitivities around releasing materials during the election period. However, he confirmed that he would keep the situation under review.

Iain proposed that a meeting be tentatively scheduled for early July, with the possibility of an earlier meeting pencilled in for late June if progress permitted. This meeting would provide an opportunity to discuss the broad themes and preliminary findings from the report.

ACTION: Tony to consider how the Board can be briefed on the Interim Report

Colm Gannon raised a further point, emphasising the importance of including clear information in the final report about biometric data privacy, particularly regarding how biometric data is processed and retained. He said this would be highly valuable for industry and regulatory understanding. Iain acknowledged this request and confirmed that it would be fed back to the team and considered carefully during report drafting.

ACTION: Iain to pass this suggestion to the technical team

Ajoy Ghosh raised a concern about the selection of technologies being tested and whether all solutions were receiving fair assessment. Tony confirmed that all participating technologies were being tested. However, he and Andrew clarified that some solutions could not be tested using the trial's current testing methodology and, as a result, had been excluded from parts of the trial and the interim report. This exclusion was due to methodological fit, not a lack of technological maturity. Tony further outlined how the trial's evaluation framework accounted for the differing characteristics of each solution, ensuring that where inclusion was possible, technologies were assessed in appropriate and fair ways.

Closing



In closing, Jon thanked all participants for their contributions and engagement throughout the meeting.

The meeting was formally concluded.