

Age verification roadmap consultations: Round 2

October 2022



This document contains insights and feedback that eSafety received from industry, stakeholder groups and experts on options to address the risks and harms associated with children's access to online pornography.

In June 2021, the Government responded to the House of Representatives Standing Committee on Social Policy and Legal Affairs' report on age verification for online pornography, tasking eSafety with the development of a comprehensive roadmap exploring 'if and how a mandatory age verification mechanism or similar could practically be achieved in Australia'.

In August 2021, eSafety issued a call for evidence and received 33 submissions. A thematic analysis of these submissions is available on our website.

Between November 2021 and July 2022, eSafety conducted targeted consultations with a wide range of stakeholders across different sectors. These sessions allowed for closer examination of the information submitted in response to the call for evidence. They also provided a forum for experts to share broader insights. The evidence received through consultation will support the development of recommendations that are holistic, viable and proportionate.

This document contains summaries of consultation sessions that were, for the most part, conducted between March and July 2022. Summaries of the previous consultation sessions, largely held between November 2021 and February 2022, are available [on our website](#).

The information in this document represents a variety of views that were discussed by stakeholders during the consultation sessions and these have been consolidated into key themes. The views and opinions in these summaries are those of the stakeholders and do not reflect eSafety's position. They will help to inform the development of the roadmap.

More information about the roadmap is available [on our website](#).

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Children and young people's wellbeing: Australian stakeholder group

Consultation group overview

Stakeholders: Australian academia, youth wellbeing groups and anti-violence advocacy groups.

Consultation dates: 24 January, 4 February and 22 June 2022.

Overview: These stakeholders discussed age verification, children and young people's access to pornography, and educational approaches, measures and opportunities.

Children and young people's access to pornography

Comments from the first stakeholder

- This stakeholder was of the view that watching pornography is not inherently harmful for young people.
 - The stakeholder advised that young people have natural interests and curiosities that can be explored through sex-positive pornography in a healthy and developmentally appropriate way.
 - They suggested that government may not be best placed to determine what constitutes sex-positive pornography.
- However, this stakeholder did note that young people who had not received any education or support about online pornography may be more likely to be harmed when viewing it.
- In addition, the stakeholder felt that 'accidental' interactions with pornography should be differentiated from 'intentional' interactions. They offered research demonstrating that the median age of young people accidentally viewing online pornography is markedly younger than the median age of those who intentionally view the content.

Education measures and opportunities

Comments from the first stakeholder

This first stakeholder added that:

- most young people can comprehend that pornography is not 'real', but they have difficulty identifying which aspects of it are unrealistic (this observation was based on the stakeholder's own research)
- educational measures are key to providing countervailing information and can help to inform young people about healthy sex and relationships
- they support the implementation of some measures to restrict young people's access to online pornography, however, do not believe that age verification is the most appropriate measure for balancing freedom of access to information and protecting young children from harmful content
- there is research indicating that young people oppose content blocking tools but support education programs addressing healthy pornography consumption.

Educational approaches

Comments from the second stakeholder

The second stakeholder made the following points:

- Education about pornography and sexuality should be sustainable and integrated into schools.
- Teachers should be well trained, supported and appropriately resourced to provide this education. They acknowledged that every teacher's level of experience will vary - some will be confident, while others may feel unsupported, lack confidence, be unsure about how to have appropriate conversations, and know very little about contemporary pornography.
- External presentations, if they occur, should be complementary to lessons embedded within the curriculum, not a substitute for lessons currently addressing these issues.
- This stakeholder also pointed to advice from the United Nations Educational, Scientific and Cultural Organisation (UNESCO) which supports an integrated approach to education, rather than relying on external presentations. UNESCO says that content should be embedded in the school curriculum, as age-appropriate content can be

delivered every year and contextualised within the broader curriculum. The stakeholder also expressed the view that:

- one-off external presentations – which rely on an individual presenter – can be ineffective pedagogically (as they are often in the form of a lecture, rather than participatory and learner-centred). There could also be challenges associated with quality assurance, highlighting the need to ensure that external presenters use a sound conceptual framework and avoid a shame or fear-based approach.
- young people may be more comfortable participating in an external presentation and willing to volunteer information and have conversations about pornography with a person they do not know, rather than with their teachers. However, it was noted how difficult it can be for a third-party to provide ongoing support and follow up with students. It can also be hard for teachers and students to have sensitive conversations. Accordingly, this stakeholder highlighted the importance of supporting teachers to develop confidence in talking about these issues.
- The stakeholder noted that educational content regarding pornography aligns with the health curriculum, however, there is also value in finding ways to integrate discussions and learning outcomes into media and digital literacy lessons as well.
- The stakeholder said that it was important to consider the welfare of children when introducing these types of topics.
 - They suggested that schools may feel comfortable initially starting education about pornography in Years 9 to 10, as that is where the connections to the curriculum are the strongest. However, as parents and school communities are brought along on the journey, they noted there are opportunities to introduce content addressing pornography in earlier years, using less explicit language. They felt this would allow the lessons to build on each other and enable age-appropriate learning at each stage.
 - They emphasised the importance of educational measures being age-appropriate and child-focused.
- The stakeholder reported that, in their experience, many schools have expressed an interest in obtaining information and support to address the topic of speaking with students about pornography, healthy sexual behaviours and incidents involving pornography among students or on school grounds.

Young people's access to and use of pornography

Comments from the third stakeholder

The third stakeholder made several points and they:

- emphasised the gendered nature of pornography. They noted this can include rigid and hierarchical gender stereotypes and problematic notions of power and consent. They suggested this was an important lens for consideration within the roadmap
- noted that their work was not focused on stopping young people from watching pornography, but rather encouraging them to engage with it critically
- felt that a holistic and gendered approach was needed to address the impact of pornography on young people – particularly considering the different ways in which girls and boys are affected. This would entail working with young people as well as parents, schools, the media and government
- advised that their research shows young people hold conflicting and nuanced views on pornography. They can find it concerning, but also informative; find it enjoyable, but also be critical of it.

Messaging and engaging young people

Comments from the third stakeholder

- The third stakeholder creates resources for young people and made the following comments:
 - From their research, young people and children commonly get information about sex and pornography from their peers and pornography websites.
 - They have found a peer-to-peer and youth-led learning approach is effective, noting that young people have capacity and resilience to navigate complicated issues themselves, with the right information and support.
 - It is important that resources are online, as this is where young people are searching for information.
 - There is a need to tailor resources differently for different genders, as they seek information from different sources.

Privacy and digital rights: Australian stakeholder group

Consultation group overview

Stakeholders: Australian digital rights advocates.

Consultation dates: 4 March and 12 July 2022.

Overview: These stakeholder groups discussed age verification and data, privacy and technological measures, scope and education, standards and compliance measures and provided recommendations for the design of an age verification regime.

Data, privacy and technological measures

Comments from the first stakeholder group

- These stakeholders raised concerns about the collection, use and storage of personal information, noting that once data is collected, it has the potential to be misused. The group also:
 - suggested that the risks of harmful consequences, data breaches and privacy intrusions should be considered. Similarly, the point at which the risk of harmful, unintended consequences for privacy outweighs the age verification regime's objectives to prevent harm to children, should be made clear from the outset
 - said it could be difficult to 'turn off' aspects of a mandatory age verification regime, should substantial data and privacy breaches occur
 - did not support the collection of biometric information for purposes of estimating or verifying the age of users
 - expressed apprehension about the uptake of measures which may normalise surveillance, as well as introducing technological tools that could be linked with other identity systems.
- The stakeholders felt that content moderation at scale, particularly systems with little to no human intervention, are of significant concern. Stakeholders flagged the challenges and risks of automated content moderation at scale, emphasising the risk of over-blocking and stigmatising marginalised groups.

- Stakeholders stated that age assurance technology providers should be transparent about their systems and processes. They felt that the public should have access to evidence which substantiates the effectiveness of providers' technologies and demonstrates adherence to information privacy and security standards.
- Stakeholders advised that interventions which consolidate power in large platforms and inhibit competition should be avoided.

Comments from the second stakeholder group

- One stakeholder suggested that it is nearly impossible to identify every stakeholder that may be affected by an age verification regime, advising that some parties may not realise they are impacted. They said that even though it might be difficult, it would be important to help those parties understand any risks which may affect or apply to them.
 - They also felt it was important to understand that even if the risk to an individual may not be significant in aggregate, the risk to a number of people may be significant. There was also a need to consider the risk of projecting unknown and unidentified risks onto individuals.
 - A point was made that the roadmap should acknowledge the context and implications of other movements to identify people on the internet, and how age verification may intersect with those discussions.
- Another stakeholder suggested eSafety should consider options that aren't 'perfect', although it would be necessary to determine an acceptable error rate. The stakeholder noted the need for fast, empathetic and caring appeal or solution processes for groups more likely to be impacted by potential errors.
- The stakeholder also said systems, such as the verified credentials proposed in New South Wales, could be a potential measure for consideration – particularly where the system shares verified credential or attribute information only (for example, if a user is 18 years or older), and not other unnecessary data (such as a birthdate).
- Stakeholders supported a data-minimisation approach and emphasised the right to participate online free from surveillance, arguing that safety and security can be promoted by collecting, using, storing and sharing less data.
 - Stakeholders identified specific privacy risks raised by age verification measures, including that the risk of re-identification is possible even from seemingly anonymous data.

Scope and education

Comments from the first stakeholder group

These stakeholders:

- emphasised the need to create a clearly defined scope for the roadmap to reduce the risk of capturing and restricting more content than necessary
- felt that the age of consent and the evolving capacity of young people as they grow up should be considered when determining access to sexual and pornographic online content. Stakeholders expressed that not all pornography is harmful and that access to this content can form an important component of sexual education, particularly for diverse or marginalised communities for whom generic sex education may not be relevant or inclusive
- supported the role of respectful relationships education and holistic sex education and its inclusion in the roadmap's recommendations
- said that education is a critical component to building digital literacy and minimising any negative impacts stemming from underage access and the use of pornography
- were concerned about any regime which might rely solely on technological solutions to address what they consider to be fundamentally a social problem. Stakeholders preferred to prioritise educating and empowering children and young people and their families.

Standards and compliance

Comments from the second stakeholder group

- Stakeholders held mixed opinions and discussed the role of the International Organization for Standardization (ISO) and other international standards, and the potential for independent or government certification.
- Stakeholders noted the value of alignment with ISO and international standards. They said, however, that a conflict of interest could potentially be a risk to standards and certification processes.
- The group discussed the need for continuous auditing processes for the duration of age verification implementation to identify where protections fail, and where measures cause mass risk to people's privacy or other risks. They suggested that:

- any regime should be non-prescriptive about standards and any testing and auditing authority should be kept separate from legislation
- the relevant regulator should not inspect every age verification service but rather should be the backstop to third-party auditing
- the cost of independent auditing should be absorbed by the online industry as a routine cost of doing business.
- Stakeholders raised general concerns about the adequacy of current legislation to protect individuals' privacy.

Summary and recommendations: Privacy and digital rights

Comments from the first stakeholder group

- Stakeholders in this group indicated that:
 - the legislation should include a review period and/or should have sunset provisions
 - there should be clear consequences for data breaches or other misuse or mishandling of data
 - accessible and affordable legal avenues should exist for individual and collective rights of action against privacy breaches and other forms of possible harm
 - the roadmap should empower parents and carers to make choices suited to their individual circumstances.

Comments from the second stakeholder group

- A stakeholder in this group noted that a multifaceted approach is needed, suggesting that a package of holistic measures would be most likely to achieve a measured and effective response.
- Another stakeholder stated that a regime should not be 'set and forget', especially in relation to privacy and security requirements. They expressed that it will need to be developed iteratively, as many risks and consequences may not be apparent until the implementation starts.
 - Stakeholders thought it was important to continue to consult with stakeholders through the implementation phase, particularly on solutions to issues that may arise over time.
- A stakeholder suggested designing friction into the process of changing or expanding age verification measures to manage associated risks – for example, requiring the Australian Parliament to embed measures in any primary legislation, not just under subordinate legislation.

Education: Australian stakeholder group

Consultation group overview

Stakeholders: Australian education authorities.

Consultation date: 10 March 2022.

Overview: This stakeholder group discussed age verification and children's access to and use of pornography, support for schools and teachers, broader educational measures and current technological approaches to reduce students access to pornography in schools.

Children's access to and use of pornography

- Stakeholders shared examples of incidents that had occurred in Australian schools involving students' use of pornography. The incidents demonstrated that:
 - Pornographic content is being viewed and shared at primary and secondary levels, as early as Year 1. A pattern had been observed of students viewing pornography from increasingly younger ages over the medium term, with the use of pornography being normalised by the time students reach secondary school.
 - Students are sending sexually explicit images and hyperlinks to sexually explicit content through messaging apps, as well as using personal devices or virtual private networks (VPNs) to bypass content restrictions on school Wi-Fi networks.

Support for schools and teachers

- Stakeholders reported many schools are seeking advice on how to respond to students accessing pornography during school hours.
 - Stakeholders felt that both primary and secondary school teachers should be supported to have conversations with students about pornographic or sexualised content online, noting that teachers may lack awareness around the nature of this content.
- People in this group suggested that continuing professional development (both courses or resources) would be helpful for supporting teachers to have difficult conversations

with students and parents, and to better understand the issues relating to online pornography.

- Some saw ongoing professional development as more effective than including new curriculum content in pre-service teacher training as it could be updated more frequently to reflect developments in technology. Stakeholders were complimentary of eSafety's existing resources to support parents and carers to have conversations with children, and suggested that eSafety could be involved in developing these resources for educators.

Broader educational measures

The stakeholders in this group:

- discussed developments to curriculum and noted there may be opportunities to include information about online pornography in education about digital literacy, respectful relationships and consent and sex
- acknowledged that although students may find it easier to speak with non-school staff (such as external presenters) on the subject matter, educational measures should be embedded in curriculum and schooling. They made the point that this facilitates longer term and sustainable impact as there would be age-appropriate learning outcomes embedded consistently into each schooling year. Stakeholders noted that teachers and school leaders can also provide consistency in content implementation and ongoing support
- said that schools across Australia are at different stages in transitioning from a biology-focused approach to sex education to a more contemporary approach. They felt that health teachers are currently the most experienced and best placed to deliver educational content on this subject matter.

Current technological approaches to reducing students' access to pornography in schools

- Stakeholders said technological approaches to preventing students' access to pornography varied across jurisdictions. Measures included:
 - device level filters
 - network level filters

- pro-active scanning for language of concern and individual incident alerts on the school Wi-Fi network.
- People in this group identified challenges, such as students using a mobile hotspot or personal devices (not subject to school controls) to avoid the content filters and restrictions.
- It was noted that content filters and restrictions could either be applied to the whole school population or by year group to align with age-appropriateness.
- Stakeholders also flagged the role of technology usage agreements, codes of conduct and policies for personal mobile phone use at school as measures which also address access to pornography.

Understanding harmful behaviours and providing support to young people: Australian stakeholder group

Consultation group overview

Stakeholders: Law enforcement intelligence, researchers and clinical therapists for young people who have been court sanctioned for sexual offences.

Consultation dates: 8 November 2021 and 17 March 2022.

Overview: This stakeholder group discussed age verification and young people's access and use of pornography, how young people access information, and gaps and opportunities in education.

Young people's access to and use of pornography

Comments from the first stakeholder

- The stakeholder's evidence suggested a potential correlation between increased access to online pornography and increased sexual behaviours among 13 to 15 year-olds. The stakeholder's data also suggested increasing numbers of teenage girls presenting for medical treatment for injuries sustained through sexual activity that may be influenced by online pornography.
- The stakeholder acknowledged the influence of pornography on child development is still relatively uncharted territory and there is likely significant variety in the amount and type of content watched by young people.

Comments from the second stakeholder

- This stakeholder noted that the rate of young people accessing pornography is quite high, however they said that it is difficult to determine any common effect on young people committing sexual offences.

- They expressed that identifying a causal link between pornography consumption and harmful sexual behaviours is sensitive and not straightforward as there is substantial complexity in the way harmful sexual behaviours present among young people.
- The stakeholder explained that they discuss pornography consumption as a potential factor in a young person's behaviour on a case-by-case basis with their clients. It has been identified as a factor in some, but not all, cases.
- They observed that it can be difficult to disentangle any potential impacts of a young person's pornography consumption from other factors that may have contributed to their harmful behaviours, such as adverse childhood experiences including maltreatment, dysfunctional families, sexual victimisation or a lack of protective factors. They also emphasised that factors such as experiencing domestic violence may attract young people to watching or re-enacting the coercive scripts found in some pornography.
- The stakeholder expressed concerns that restrictions on mainstream content may unintentionally encourage young people to access fringe content, which may accelerate interests in extreme, violent or abhorrent content by young people who are already vulnerable.

How young people access information

Comments from the first stakeholder

- The participant noted that law enforcement can provide support by sharing relevant data and intelligence to inform understanding about associated risks and harms but may not be best placed to deliver prevention messaging in relation to children's access to adult pornography.

Comments from the second stakeholder

- This stakeholder noted that, unlike other frontline workers, trained clinicians are skilled in navigating conversations about sex and pornography with young people. They made the point that clinicians also have specific resources available for clients who have preoccupations with, or compulsions towards, unhealthy sexual behaviours.
- They advised that young people should have a safe place to find information and ask questions. In their experience, young men have many questions about sex, their own sexuality and whether they are 'normal'.

- The group noted that young people will seek out information online (such as through YouTube), however it is hard to establish the quality of the information available to them. They stated that:
 - it is difficult for young people to find quality, scientifically backed resources unless they are specifically directed to them
 - it is important to enable young people to ask questions and seek information online and anonymously to reduce associated stigma.

Gaps and opportunities in education

Comments from the second stakeholder

- The stakeholder believed that children and young people who are not engaged in school are likely to miss out, even though school education about sex and consent has improved. Similarly, they highlighted that vulnerable young people, such as those in out-of-home care or those living with disability, may not have a clear path or responsible trusted adult to discuss their questions and concerns regarding healthy sexual behaviours and pornography.
- They acknowledged the importance of timely education, suggesting that late primary school (ages 8 to 10) is a suitable time to start having conversations with children about topics like consent, in a way that is appropriate to their age.
- The group also said that many parents and carers wait for children to start conversations about topics like online pornography, which they felt can often be too late as it suggests that children may have already accessed pornography.

Business and consumers: Australian stakeholder group

Consultation group overview

Stakeholders: Australian financial service providers.

Consultation dates: 28 and 31 March 2022.

Overview: These stakeholders discussed age verification in other contexts, business and consumer needs and expectations, and complementary measures for age verification and assurance technologies.

Age verification in other contexts

- Both stakeholders provided overviews of how proof of age can be verified in commercial contexts that do not relate to online pornography, for example, online banking or alcohol sales.
- They explained how points of purchase (merchants) are connected to digital verification services (verification services) via a third-party exchange (exchange).

Comments from the first stakeholder

- Whereas some commercial contexts require identity to be verified, the stakeholder noted that a provider of adult content who wants to prevent access by underage users only needs limited information, confirming that a prospective user is a real person and 18 years or older.
- The stakeholder highlighted that there are:
 - methods of limiting the amount of information shared through an exchange between parties
 - methods for only sharing individual attributes determined by individual users
 - options for individuals to have information stored and reused on a verification service or used in a one-off information exchange and then erased

- various international standards which can be used to guide the development and maintenance of privacy, security and safety standards of digital verification services.

Comments from the second stakeholder

- The stakeholder said that digital identity solutions should minimise data sharing and use zero-knowledge proofs. This means the merchant can only see confirmation that a user is a real person and is over 18, but does not see the user's name, date of birth or other identifying information.

Business and consumer needs and expectations

Comments from the first stakeholder

- The stakeholder explained that exchanges can be jurisdiction and technology agnostic, which could support its use by both international and domestic businesses, as well as adult sites operating across borders.
- The stakeholder noted that currently identity verification is a high friction, high frustration and high cost experience for most businesses and consumers. They expect however that verifying identities digitally will become the easier path, as digital IDs become more mainstream and more options are available to businesses and consumers.
- They advised that businesses want to create more seamless customer experiences and lower costs while also ensuring they can confidently comply with privacy, safety and security requirements.
- Similarly, they noted consumer perspectives on identity verification and data-sharing concerns. They stated consumers are often more comfortable providing information to trusted providers for transactional purposes (for example, purchasing online from a familiar brand).

Comments from the second stakeholder

- The stakeholder stated that payment services have limited visibility as to the nature of purchases, however they can intervene in instances of illegal conduct (such as the sale of counterfeit goods).

- The stakeholder advised that they have internal mechanisms and rules about illegal content, however it was more complex to apply to situations where the product is legal, but age restricted. The stakeholder believed that responsibility for enforcement of age restricted goods (such as gambling or pornography) should generally lie with the ‘retailer’ or bank, rather than payment services.
- The stakeholder highlighted that legitimate and legally compliant businesses can face impediments to accessing banking services which can often increase risks for already vulnerable people.

Complementary measures for age verification and assurance technologies

Comments from the first stakeholder

- The stakeholder emphasised the importance of public awareness and education around verification and assurance technologies, standards and requirements for individual privacy, safety and information security.
 - They said that services have a role to play in highlighting the relevant features of their verification tools, however government could also play a role in improving public awareness of the design and appropriate use of these technologies – particularly as they become more common in commercial settings such as banking, gambling and age-restricted goods.

Digital platforms and services: Australian and international stakeholder group

Consultation group overview

Stakeholders: Digital platform and service providers.

Consultation date: April to June 2022.

Overview: eSafety held multiple individual and roundtable discussions with digital platform and service providers. Stakeholders included social media platform providers, device manufacturers, search engine providers, app store providers, industry groups and other digital service providers.

The following summarises the comments made during individual consultation meetings and a roundtable session.

Current measures

Stakeholders operating digital platforms each used different measures to protect children and young people from age-inappropriate or harmful content. The measures across industry varied as the platforms and services had different rules or terms about pornographic content.

Platforms and service providers that **do not allow** pornographic content under their terms of service discussed how they employ measures such as:

- Machine learning and human-based content moderation, and filter systems to remove pornographic content.¹

Platforms and service providers that **do allow** pornographic content discussed how they employ measures such as:

- Machine learning and human-based content moderation, and filter systems to identify content which is not permissible under their terms of service (such as violent or non-consensual content).

¹ Machine learning is a type of Artificial Intelligence (AI) which uses data and algorithms to make decisions without human input while also 'learning' to gradually improve its accuracy.

- External and internally operated age verification measures for users who upload content.
- Age gating either the platform, or certain areas of the platform; allowing users to report suspected underage users; and verifying user age through identity documents in appeals processes.
- Measures which limit the reach of pornographic content, or rules that prohibit pornographic content from being visible in areas of the platform accessible to users who are not signed in, or users with an under-18 profile.
- Measures enabling users to identify content as sensitive or appropriate for those who were 18 years or older, which require additional consent or input from users to view such material (for example, blurring an image until a user clicks to confirm they wish to view the post).

Some platforms, regardless of rules about adult content, employed other additional safety measures, such as:

- Behavioural analytics or machine learning tools to identify underage users; imposing more privacy-preserving default settings; and limiting content and contact for younger users.
- Default settings for younger users who have declared their age, including limiting public and private communication with other users, and limiting the reach of user-generated content.
- Providing information to parents about the tools available to curate their child's experience on the platform.

Proposed measures as part of the roadmap

- Stakeholders acknowledged that platforms and service providers have a responsibility to keep all users safe, especially young users. They agreed that this includes measures which prevent the distribution of age-restricted or harmful content to children and young people.
- The stakeholders held a variety of views on how this objective was best supported. Across the sessions, stakeholders discussed various measures that could support the roadmap's objectives. These included:
 - The need for multifaceted and holistic measures to address children and young people's access to content, including less onerous age assurance for lower risk

settings and measures to support education about pornography in addition to technical solutions.

- The implementation of age assurance measures further up the digital stack (for example, at the device level) as a way of addressing efficacy, improving child protection and minimising potential privacy risks. They felt this would require less collection and duplication of data.
- Encouraging use of device and app store parental controls, which already exist but may have low familiarity and uptake. They suggested the roadmap could include recommending increased government or eSafety resources in this area. The stakeholders also noted an opportunity for industry and government to think collectively about how to get the right information to parents at the right time.

Types of measures

Stakeholders broadly supported the notion of preventing children from accessing pornographic or other age-inappropriate content but noted that it could be approached in many ways. Some stakeholders felt that age assurance and age verification could assist in preventing access to age-restricted or harmful content, but that a multi-layered and holistic approach was required. Many stakeholders held differing views about the efficacy and benefits of the different safety measures that are available.

Moderation

- One stakeholder noted that due to the scale and volume of content on their platform, they use machine learning and human moderation. The stakeholder noted that while machine learning models are essential to respond to the scale of content, human moderation is important to apply context.
- The stakeholder noted that it is easier for machine learning based moderation techniques to pick up content which contains nudity as it is less reliant on textual/audio context.
- Another stakeholder reflected on their own age verification practices. They identified sensitivities, also noting the importance of human intervention in age verification and in content moderation, to reflect the nuance of online communication. The stakeholder advised that it is important to have human intervention in verification processes, especially for certain groups. For example, they pointed out that there are members of the trans community, where their lived identity does not necessarily match their identity documents.

Parental controls

- Stakeholders discussed the variety of parental controls and measures currently available, including those where devices for children can be limited to allow only certain apps, or to limit web browsing functionality.
- One stakeholder said parents should be empowered to make their own choices in operationalising tools and settings that curate experiences for their child, based on their own values and their child's maturity levels.
- Another stakeholder noted that many of the current safeguards rely on parents actively choosing to implement parental safety controls.
- Several stakeholders said reliance on parental controls and device filters should be considered in the context of vulnerable and disadvantaged young people.

Age assurance and age verification

- One stakeholder suggested that age assurance is a good compromise for some circumstances. The stakeholder felt that while verification is an extra burden, it is effective as a safety measure.
- Another stakeholder advised that many in the industry view age assurance technology as new and unreliable and are uncomfortable with its use until the technological solutions are more robust and there is clearer guidance on the privacy implications. They suggested its use, potential and applicability as a solution in the roadmap should be further studied.
- A comment was also made about digital tokens as a form of age assurance or age verification, noting that they are a relatively lower burden compared to other age assurance measures. The stakeholder noted that tokens are based on simple technology but would be best supported by wide uptake and non-proprietary options.

Impacts of age assurance and age verification

- One stakeholder stated that the cost of age assurance or verification measures is not prohibitive, but is a valid cost of doing business, akin to insurance. The stakeholder noted it will impact on industry revenue, but the ability to make revenue should not be unfettered at the expense of safety.
- The stakeholder, drawing upon their experience in jurisdictions where age verification has been mandated, noted that the increased friction did result in fewer users.

Age assurance and age verification models

- Several stakeholders suggested that responsibility for verifying the age of users should be raised as high as possible in the digital stack (that is, at the operating system or device level). Stakeholders noted it is harder to maintain consistent information about age when relying on individual platforms and services to verify information. Similarly, they felt it would remove duplication of effort for both end users and companies.
 - A stakeholder believed this would also remove the need for parents and carers or users to configure individual settings for every website, platform or service and instead allow them to opt in or out only once.
 - Another stakeholder offered an example of devices verifying the age of its users through information already held for contractual or security purposes. They noted devices could then share the age attribute (such as '18+') with apps or platforms downloaded to the device. In that case, the platform would not collect or store any additional identifying information about the person.
 - A stakeholder noted that individual platforms can subsequently design age-appropriate experiences relevant to an individual user's age and any jurisdictional requirements. For example, some content or functions may only be accessible based on users being 18 years and older (such as sexually explicit content). Alternatively, bespoke experiences could also be shaped for different age groups (for example, ages 10 to 11, 12 to 13, 14 to 15).
 - A stakeholder acknowledged that this approach could consolidate market dominance by manufacturers and emphasised that interventions should balance safety, privacy and competition.
- Another stakeholder did not believe device security measures (such as existing PINs or biometrics used to unlock devices) were appropriate tools to use for the purposes of the roadmap.

Trust in age assurance and age verification

- Many stakeholders raised public trust in age assurance and age verification measures as a concern.
- One stakeholder felt age verification and age assurance may have an important role to play but noted that many people have concerns with the digital industry's use of data and with the potential unreliability of age estimation. The stakeholder noted that public trust is key.

- Another highlighted that implementing any form of verification requires users to trust the platform and to feel comfortable sharing personal information.
- Another stakeholder noted that transparency is key. They proposed user awareness of processes, and platforms not asking for more information than needed, or keeping that information longer than necessary, were fundamental elements to good age verification practice.

Age verification regime design

- One stakeholder suggested a legislative obligation was necessary in order to create an online environment where age verification is the norm. They felt without such an obligation creating consistency across platforms, users would have broken or inconsistent experiences. They also acknowledged the business cost in developing age verification or assurance systems and the challenge of compliance across different jurisdictions.
- Another stakeholder acknowledged that all parties in the tech industry are facing the challenge of moderating content. They advised that while their approach of having all content scanned by technology and subject to human moderation was not easy, it was worthwhile. The stakeholder considered that the onus should be on platforms to do more – and they did not need to wait for legislation to force them to do more.
- Several stakeholders advised that the roadmap and any subsequent implementation should account for the different business models and types of platforms. The stakeholders also considered that the nature and age of the user base was a relevant consideration in determining proportionate measures.
- One stakeholder in this group was concerned that age assurance or age verification technologies were being presented as quick and definitive solutions to a complex problem and stressed the need for a holistic response that does not rely on a single solution.

Reaching parents and carers

- Stakeholders discussed how they communicate safety information to users and parents and carers of younger users.
- A stakeholder reported that it can be challenging to engage with parents and carers about safety tools. The platform provider explained that they partner with non-government organisations (NGOs) and specialist organisations for their engagement and outreach to parents and carers.

- Another explained that they are exploring partnerships with influential creators on their platforms, to encourage peer-to-peer learning about safety tools and strategies.
- One stakeholder said that industry practices around parental controls and educating parents about them are inconsistent. The stakeholder discussed parent-led learning as an opportunity to share safety information. This would mean taking safety information to places where parents communicate (such as parenting groups on social media) or to parent organisations to distribute, rather than requiring the parent to reach out to the platform.
- A stakeholder flagged the challenge of reaching parents with safety information and suggested such efforts should be part of the roadmap. They also expressed that disadvantaged and marginalised children and young people are more at risk of online harms and should be a particular focus in the roadmap. For example, the children who may not be receiving sex education in school and who may not have parents that are willing to discuss sex education matters at home.
- The point of sale for devices was also seen as a potential safety check point where relevant safety settings could be explained and applied. However, stakeholders noted that many young people receive second hand devices from adult family members, meaning point of sale will not always be the ideal time to engage parents and carers, and children.

Accessibility and fairness

- Stakeholders discussed issues of capacity, equality and online participation as important considerations when assessing types of interventions. They acknowledged that user age verification is very complex and can have significant drawbacks for accessibility and fairness.
- Participants generally felt that verification (such as using official identity documents) was problematic in that it is not fool proof, as documents can be shared and access to documentation is not universal – which potentially affects individual rights to digital access and participation; and the collection of data raises security and privacy concerns.
- One stakeholder highlighted a tension between protecting children’s safety and wellbeing and protecting the privacy of all Australians online. They noted that a broader societal conversation should occur to identify the public’s views on how to balance each objective.

Efficacy and risk

- Stakeholders discussed the risks associated with ineffective age verification measures. Stakeholders believed it was inevitable for some young people to misrepresent their age or attempt to navigate around restrictions. They emphasised the importance of having multiple intervention layers to make evasion more challenging.
- One stakeholder highlighted that, as mainstream platforms and services do more to protect users, the interventions applied can push users to seek content from alternative platforms, browsers and websites which may be less safe, secure and compliant with applicable laws.
- Another noted that age restrictions can incentivise young people to misrepresent their age. To counter this, the stakeholder discussed ways to create unique and age-appropriate experiences for young people, such as creating teen-only spaces for young people to safely connect with peers over mutual interests.
- Stakeholders were concerned about a lack of harmonisation across international approaches, noting that an Australia-only approach could be ineffective, as mechanisms such as virtual private networks (VPNs) allow users to bypass jurisdictional measures.
- Stakeholders felt the international harmonisation of measures was important for efficacy and cost.
- A stakeholder also noted that treating all users as under 18 (unless proven otherwise) carries risks. For example, this can prevent the use of systems which limit the ability of unknown adults to contact minors.

Future technology and digital identity

- Some stakeholders discussed opportunities for age assurance and age verification measures that could be implemented through decentralised systems and settings where users would have control of their data and could choose what personal attributes were shared.
- One stakeholder said that open standards to facilitate a digital identity or attribute exchange was a viable option, but felt it was inappropriate for a single corporate entity to design or own related technology.
- Another noted that many identity checks involve needless disclosure of information. For example, providing a driver licence to purchase alcohol requires you to provide your age (necessary) as well as your full name and address (unnecessary). The stakeholder

described a model where trusted authoritative sources (both government and community-based) provide attestation for an attribute. This attestation could be issued to a cryptographic key or token on your phone and the user could share and withdraw the credential as needed.

- The stakeholder advised such a model needed to be open-source to allow users portability, choice and privacy, noting that if users cannot change the provider of the token, they could be more susceptible to censorship.

