From: s 47F @accscheme.com>
Sent: Thursday, 9 September 2021 8:56 PM
To: s 47E(d) @esafety.gov.au
Cc: Tony Allen; s 47F
Subject: Age verification call for evidence
Attachments: ACCS 0 2020 General Scheme Rules.pdf; ACCS 1 2020 Technical Requirements for Age Estimation Technologies.pdf; ACCS 2 2021 Technical Requirements for Data Protection and Privacy 280621.pdf; ACCS 3 2021 Technical Requirements for Age Appropriate Design for ISS 280621v2.pdf; ACCS 4 2020 Technical Requirements for Age Check Systems.pdf; AU ESafety Commissioner Call for Evidence Response.pdf; Call for evidence - submission form.pdf; ISO Age Assurance Standards Part 1 - WD shared with EU Consent Team 07092021.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Processed

Dear Sir/ Madam,
Please find the submission form and relevant attachments for your attention.
If you require any further information or assistance, please do not hesitate to contact me.
Kind regards

s 47F
Certification Officer
Asia and Australasia
Age Check Certification Scheme
www.accscheme.com

s 47F
s 47F
AGE CHECK CERTIFICATION SERVICES PTY LTD
ABN 66640499921

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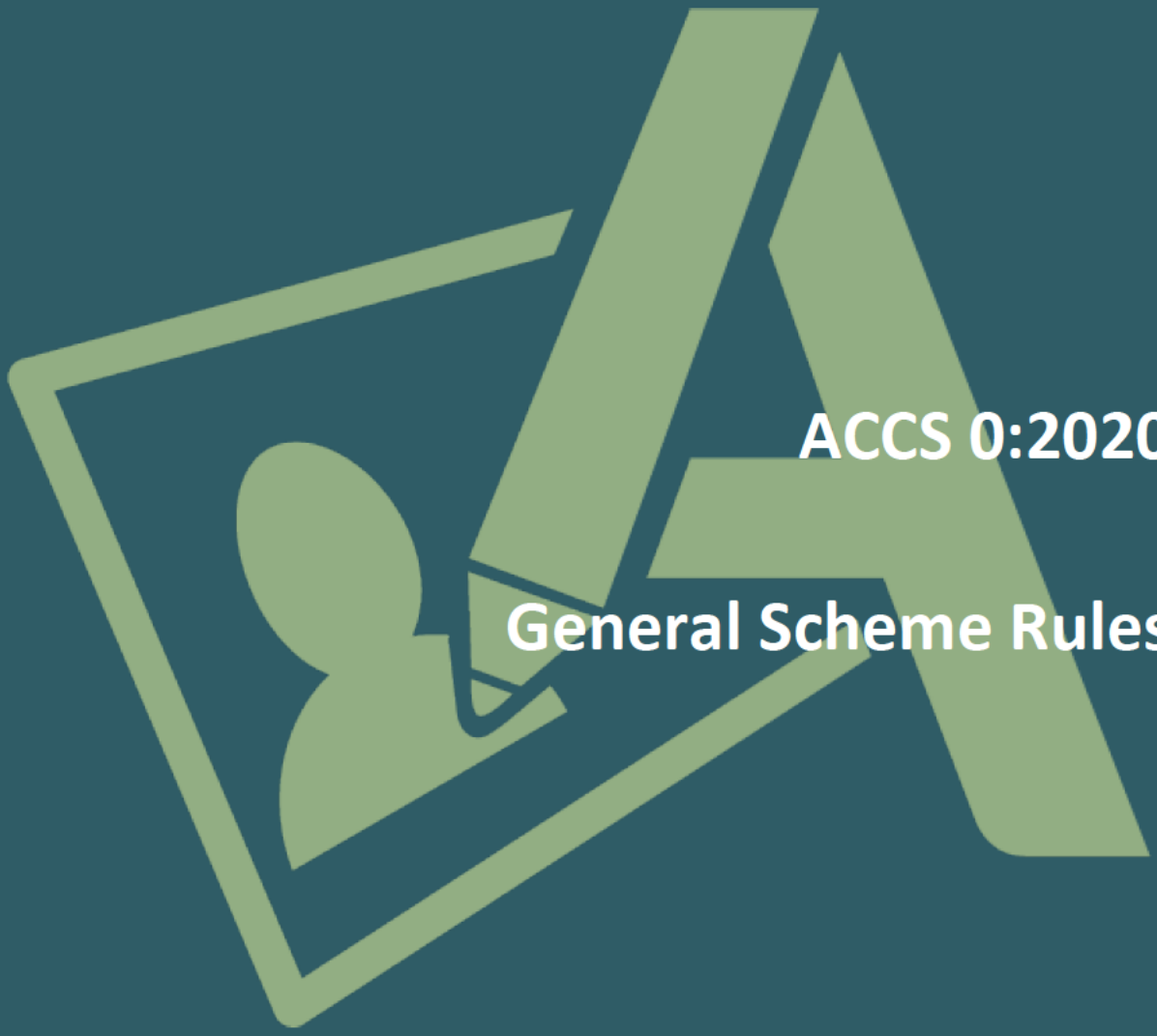
eSafety FOI 25143
Document 2 of 75

Age Check Certification Scheme

Standards and Technical Requirements



ACCS 0:2020

General Scheme Rules

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Introduction

These General Scheme Rules & Procedures set out the requirements for Scheme Clients and commitments to comply with the applicable standards for their business operations. These are set out in separate documents, but may be drawn from international or national standards (such as PAS 1296:2018), the standards of organisations that appoint the Scheme as their auditor (such as the Proof of Age Standards Scheme), or standards developed by this Scheme (such as those relating to Age Estimation Technologies).

The document then handles how audit, monitoring, certification decisions, impartiality and confidentiality are addressed by the Scheme. It sets out the different test capabilities available to the Scheme to assess the performance of Age Check Systems, both as a part of initial certification and for ongoing monitoring of continued claims of conformity.

This document also forms the Rules for the use of the Certification Mark, as required by the UK Intellectual Property Office under the registered certification mark UK 3467707.

These Scheme Rules have been designed to comply with ISO/IEC 17065:2012 and the relevant regulatory requirements for age verification service providers, the provisions of the General Data Protection Regulation (GDPR), the appropriate product and service standards and the requirements of the Trade Mark Rules 2008.

ISO/IEC 17065:2012 is the recognised international standard for how a certification body conducts product and service certification. ~~The Certification Assessment Body for these Scheme Rules, Age Check Certification Services Ltd is accredited by UKAS under ISO/IEC 17065:2012 with the registration number 21037.~~

Certification is conducted against the requirements of recognised individual age verification provider specifications, such as the requirements of PAS 1296:2018, the Proof-of-Age Standards Scheme and other standards. This is achieved through an initial appraisal of evidence against technical requirements, followed by ongoing monitoring once certification has been achieved. As this monitoring is carried out using a sampling process, certification does not guarantee the performance of any age verification product or service.

Specific technical assessment requirements, along with the applicable standards (such as PAS 1296:2018) are detailed in the individual scheme sections.

Any initial application for certification can be made by writing to the Age Check Certification Services Ltd, Unit 321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL or by visiting www.accscheme.com.

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1. Scope

The Age Check Certification Scheme (ACCS) Rules are applicable to any individual or organisation that is any:

a) Proof-of-Age ID Providers that verify age attributes and issue a reusable physical ID card, token or app that an unknown third party (such as a retailer) can rely on with or without a pre-arranged contractual relationship with the Proof-of-Age ID Provider;
b) Age Check Providers that verify age attributes on request by a third party on a transaction-by-transaction basis under a pre-arranged contractual relationship with the Age Check Provider;
c) Age Check Exchange Providers or Brokers that provide an online gateway for Age Check Providers and Relying Parties to access user asserted, permissioned and verified attributes;
d) Relying Parties (online or offline) that rely on results of an age check (either remotely or during a face-to-face encounter) to establish the age-related eligibility of an individual for the purposes of a transaction (such as sellers or providers of age restricted goods and services);
e) Information Society Services that are within scope for the Code of Practice issued under s.123 of the Data Protection Act 2018.

Age Check Providers are likely to be providing at least one of the following services aimed at achieving age assurance about any citizen:

a) Age determination – an indication established that a citizen has a particular age stated to a specified level of confidence and by reference to information related to that citizen;
b) Age categorisation – an indication established that a citizen is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that citizen;
c) Age estimation – an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen.

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2. Normative References

External standards are available for search, preview and purchase from:

- The British Standards Institute (BSI) website: http://shop.bsigroup.com/;
- Any International Standards Organisation;
- Or the specific organisation that has produced the standards (such as the Proof of Age Standards Scheme) – www.pass-scheme.org.uk.

Internal standards are available for search, preview and purchase from:

- The Age Check Certification Scheme: www.accscheme.com.

Legal Provisions

The process of gaining age assurance is governed by numerous statutes and legal provisions relating to the control of access to age restricted goods, content and services. These provisions differ between jurisdictions. The Scheme shall maintain a library of such legislation in the integrated management system. It is not practical to list all of the relevant legal provisions here and they are constantly changing. In general, however, the legal provisions are likely to relate to the sale or supply of goods, content or services such as:

- Alcohol
- Tobacco and Nicotine Vapour Products
- Gambling & Lotteries
- Weapons
- Entertainment, including online content
- Body Modification, such as tattoos or special treatment services
- Harmful Products
- Credit
- Information Society Services

There are other legal provisions which have general applicability to all Scheme Clients, these include:

- Data Protection Act 2018
- Electronic Identification, Authentication and Trust Services Regulation (EU) 2014/910
- General Data Protection Regulation (EU) 2016/679

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This Scheme is built on a modular approach to applicable standards and technical requirements. As a part of the Application Review Process, a Certification Officer assesses the applicable requirements for the business model of the Scheme Client. The suite of applicable requirements is constantly changing as new methodologies emerge, new standards are developed and new technical requirements are introduced. A full comprehensive current list can be found on the Standards Section of the Scheme website, but include:

ACCS 0: 2020 – General Scheme Rules (covering the process of certification under ISO 17065:2012);

ACCS 1: 2020 – Technical Requirements for Age Estimation Technologies;

ACCS 2:2020 – Technical Requirements for Data Protection and Privacy;

ACCS 3: 2020 – Technical Requirements for Age Appropriate Design for Information Society Services;

ACCS 4: 2020 – Technical Requirements for Age Check Providers

ACCS 5: 2020 – Technical Requirements for Age Check System Penetration Testing and Vulnerability Scans;

ACCS 6: 2020 – Technical Requirements for Parental Consent or Social Proofing for Age Gateway Technologies.

Proof of Age Standards Scheme

The Scheme is the appointed auditor for the UK's Proof of Age Standards Scheme operated by PASSCO CiC – their applicable standards include:

PASS 0:2020 – Proof of Age Standards Scheme – General Requirements and Definitions;

PASS 1:2020 – Proof of Age Standards Scheme – Requirements for Identity and Age Verification;

PASS 2:2020 – Proof of Age Standards Scheme – Requirements for e-ID Validation Technology;

PASS 3:2020 – Proof of Age Standards Scheme – Requirements for Data Protection and Privacy;

PASS 4:2020 – Proof of Age Standards Scheme – Requirements for Proof of Age Card Design and Construction.

National and International Standards

BS ISO/IEC 7810:2019 – Identification cards – Physical characteristics;

ISO 17065:2012 – Conformity assessment – Requirements for bodies certifying products, processes and services;

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ISO/IEC 19794-5:2011 + A2:2015 - Information technology – Biometric data interchange formats – Part 5: Face image data;

ISO/IEC 19795-1:2006 – Information technology – Biometric performance testing and reporting – Part 1: Principles and framework;

ISO 27001:2017 – Information technology – Security techniques – Information security management systems – Requirements;

ISO/IEC 29100:2020 – Information technology – Security techniques – Privacy;

ISO/IEC 29101:2018 – Information technology – Security techniques – Privacy architecture framework;

ISO/IEC 29109-5:2019 – Information technology – Conformance testing methodology for biometric data interchange formats defined in ISO/IEC 19794 Part 5: Face image data;

ISO/IEC 29115:2013 – Information technology – Security techniques – Entity authentication assurance framework;

ISO/IEC 30107-1:2016 – Information technology – Biometric presentation attack detection;

ISO 9001:2015 – Quality management systems – Requirements;

PAS 1296:2018 – Code of Practice for Age Check Services.

Other Documents

EDPB – Guidelines 1/2018 on certification and identifying certification criteria in accordance with Articles 42 and 43 of the Regulation 2016/679;

EA 1/22 A:2016 – EA Procedure and Criteria For the Evaluation of Conformity Assessment Schemes by EA Accreditation Body Member;

Accountability Framework, published by the UK Information Commissioner's Office;

Additional Accreditation Requirements for UK Approved Certification Schemes, published by the UK Information Commissioner's Office;

Guidance Notes, including checklists produced and published by the UK Information Commissioner's Office;

WP29 – Guidelines on the application and setting of administrative fines for the purposes of the Regulation 2016/679;

WP29 – Guidelines on Automated individual decision-making and Profiling for the purposes of Regulation 2016/679;

WP29 – Guidelines on Personal data breach notification under Regulation 2016/679;

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WP29 – Guidelines on Data Protection Impact Assessment (DPIA) and determining whether processing is "likely to result in a high risk" for the purposes of Regulation 2016/679;

WP29 – Guidelines on Data Protection Officers ('DPOs');

WP29 – Guidelines for identifying a controller or processor's lead supervisory authority;

WP29 – Guidelines on the right to data portability;

WP29 – Guidelines on consent under Regulation 2016/679;

WP29 – Guidelines on transparency under Regulation 2016/679;

WP29 – Opinion 02/2012 on facial recognition in online and mobile services (WP 192);

United Kingdom's Data Ethics Framework (updated 30th August 2018).

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3. Terms and definitions

In this document:

"shall" indicates a requirement

"should" indicates a recommendation

"may" indicates a permission

"can" indicates a possibility or a capability

GUIDANCE NOTES *are shown in italic text and are intended to assist the reader with understanding provisions.*

When referring to the ACCS Standards, refer to the ACCS Standard, followed by the year of issue, followed by the provision – such as **ACCS 0:2020, 4.3.**

3.1

Accredited Certification Body — A body that is accredited in accordance with ISO/IEC 17065 conformity assessment by UKAS or an equivalent Scheme and undertakes the assessment of ACCS applicants against the requirements of this Scheme.

3.2

Age Categorisation — means an indication established that a citizen is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that citizen.

3.3

Age Check Exchange — means an online internet gateway for age check providers and relying parties to assess user asserted, permissioned and verified attributes. *[PAS 1296:2018 – 2.1.2].*

3.4

Age Check Practice Statement — means the document describing the operational practices and procedures of an age check service *[PAS 1296:2018 – 2.1.1].*

3.5

Age Check Provider — means an organisation responsible for all the processes with establishing and maintaining a subject's identity attributes. *[PAS 1296:2018 – 2.1.2].*

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3.6 **Age Check Service**	means the entity that makes available attributes for the purposes of age checking *[PAS 1296:2018 – 2.1.5].*
3.7 **Age Determination**	means an indication established that a citizen has a particular age stated to a specified level of confidence and by reference to information related to that citizen *[PAS 1296:2018 – 2.1.4].*
3.8 **Age Estimation**	means an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen.
3.9 **Age Verification Process**	means the inter-related or interacting activities that transforms a series of attributes into an age verification product *[ISO 17065:2012 – 3.5].*
3.10 **Age Verification Product**	means the result of an age verification process *[ISO 17065:2012 – 3.4].*
3.11 **Certification Requirement**	means a specified requirement that is fulfilled by the client as a condition of establishing and maintaining certification *[ISO 17065:2012 – 3.7].*
3.12 **Certification Scheme**	means the Age Check Certification Scheme *[ISO 17065:2012 – 3.9].*
3.13 **Client**	an organisation that has applied for certification or been granted certification that is responsible to ACCS for ensuring that the certification requirements are fulfilled *[ISO 17065:2012 – 3.1].*
3.14 **Consultancy**	means the provision of services for: (a) The designing, specifying, maintaining, installing or providing an age check system or being a relying party for an age verification system; or (b) The designing, specifying, maintaining, installing or providing an age check system to be certified *[ISO 17065:2012 – 3.2].*
3.15 **Evaluation**	means the combination of the selection and determination functions of conformity assessment activities against the scheme rules *[ISO 17065:2012 – 3.3].*

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3.16	
GDPR	General Data Protection Regulation.
3.17	
ICO	Information Commissioner's Office.
3.18	
ILAC Agreement	means an agreement that has been signed by various international accreditation bodies in order to allow mutual recognition.
3.19	
Impartiality	means the presence of objectivity *[ISO 17065:2012 – 3.13].*
3.20	
Initial Type Test	a test or calculation against defined procedures to determine the performance characteristics of a product. In order to be accepted as part of the Scheme, Initial Type Testing shall meet the criteria set out in Section 6 of this document.
3.21	
IPO	Intellectual Property Office.
3.22	
Scheme Owner	means the Age Check Certification Scheme Ltd *[ISO 17065:2012 – 3.11].*
3.23	
Scope of Certification	means the identification of the age check functions for which certification is granted, the applicable scheme and the standard, code or regulations (including their date of publication) to which it is judged that the age check function complies *[ISO 17065:2012 – 3.10].*
3.24	
UKAS	United Kingdom Accreditation Service.

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4. Regulations Governing the Use of the Certification Mark

4.1 This section is for compliance with the Trade Mark Registrar's Regulations governing the use of the ACCS Certification Mark. These Scheme Rules also comply with the requirements of the Trade Mark Rules 2008 and have been assessed by the Intellectual Property Office. The condition of use of these marks by certified clients is given below. The format of the Marks is given in Section 8 'Certification Marks'.

4.2 The ACCS Certification Mark UK 3467707 for the mark "Age Check Certified Scheme" ~~is approved by the Intellectual Property Office (IPO).~~

Persons authorised to use the mark

4.3 The persons authorised to use the mark are any individuals or companies having achieved a certificate of conformity and demonstrating ongoing compliance with the Scheme Rules that are:

- Proof-of-Age ID Providers;
- Age Check Providers;
- Age Check Exchange Providers;
- Relying Parties that rely on results of an age check;
- Information Society Services.

Characteristics being certified

4.4 Use of the mark certifies that the products, processes and systems of the certified provider can, within the scope of their certification, meet the relevant requirements of appropriate standards or regulations regarding age verification and the protection of children from harm from access to age restricted content, goods or services.

How the certifying body tests those characteristics

4.5 The certifying body will test the characteristics by performing initial type testing in relation to the relevant individual criteria, covering the age verification service provider type to be certified.

4.6 Further details of this can be found at Section 6 of these General Scheme Rules & Procedures.

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4.7 How the certifying body supervises use of the mark:

- following an initial audit and issuance of a certificate of conformity;
- regular monitoring based on a randomised sampling approach;
- accelerated sampling because of persistent non-conformances;
- recertification at defined intervals not exceeding two years.

Fees to be paid

4.8 Details on the fees can be found at Section 14 in these General Scheme Rules & Procedures.

Procedure for resolving disputes

4.9 Any initial appeals specifically dealing with the refusal of an authorised user to become part of the certification scheme can be found in Section 11 of these General Scheme Rules & Procedures.

Condition of the Regulations

4.10 It is a condition of use that the mark shall not be used without indicating that it is a Certification Mark.

Amendment of the regulation not without the consent of the register

4.11 An amendment of this Section 4 of the General Scheme Rules & Procedures governing the use of the ~~registered~~ certification mark shall not take effect unless and until the amended regulations are filed with the Trade Marks Registrar and accepted. Any significant amendments to these Scheme Rules may be subject to stakeholder review and input.

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5. Requirements for Age Check Best Practice

5.1 The Scheme aims to achieve the following:

a) To provide appropriate validated tools to help prevent harm to children and nuisance caused by young people from access to age-restricted content, goods and services.
b) To improve the quality, consistency and performance of age verification systems and procedures both online and offline.
c) To provide consumers, purchasers, specifiers, regulators, law enforcement authorities, content providers, service providers and goods retailers with the assurance for them to identify suitable companies for conducting age verification.
d) To help companies and individuals to demonstrate that their services or products meet an appropriate standard.
e) To enable companies to demonstrate compliance with GDPR of processing operations by controllers and processors.
f) To mitigate the risks of non-compliance with age-restricted content, goods or services legislation including mitigating the risks of:

    a. criminal or disciplinary sanctions;
    b. civil or criminal action against the business and individual staff;
    c. damage to reputation leading to a loss of business;
    d. licensing action, conditions or restrictions imposed by Licensing Authorities.

Commitment to Age Restrictions Best Practice

5.2 All Scheme Clients shall:

(a) have a publicly stated commitment to supporting measures of best practice to reduce the access children have to age-restricted goods, content and services;
(b) act in a manner that is consistent with that commitment;
(c) co-operate and support other parties in acting in a manner that is consistent with that commitment.

Commitment to Age Checking Policies

5.3 All Clients that are Age Check Providers shall develop and adopt an age checking policy which includes as a minimum:

(a) a commitment to continual improvement of age checking practices;

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(b) age bands that users are to be checked against and data sources suitable for age checking that age band;
(c) any legal and regulatory age checking requirements that might apply to the relying party's service;
(d) whether user anonymity is a significant factor for the relying party's users;
(e) frequency of age re-checks needed;
(f) the quality levels required for the accuracy of the age check, including the minimum trust capability categories of any data sources used, given the nature of the online service, its users and regulatory environment;
(g) where consent to age check personal data processing might be required and other data protection requirements;
(h) any known exploits to circumvent age checks with any associated security measures needed to ensure more valid age checks;
(i) any communication needed about the relying party's age checking policy for regulators, users and the general public; and
(j) need for awareness of other considerations relevant to the relying party's service and regulatory regime *[PAS 1296:2018 – 3.1]*.

Commitment to Quality

5.4 All Scheme Clients shall either:

(a) establish and maintain a management system, in accordance with the provisions of ISO 9001:2015 that is certified by an accredited certification body; or
(b) establish and maintain a management system that meets, as a minimum, the requirements of section 5.5.

5.5 The minimum requirements referred to in section 5.4 (b) are as follows:

(a) a statement of the Scheme Client's 'top management' to establish, document and maintain a commitment to quality;
(b) the appointment of a Senior Person who, irrespective of other responsibilities, shall have responsibility and authority that include the following:
    a. ensuring that processes and procedures needed for the management system are established, implemented and maintained;
    b. reporting to 'top management' on the performance of the management system and any need for improvement;
(c) procedures for the control of documents (internal and external) including:
    a. the controls needed to approve documents for adequacy prior to issue;
    b. review and update (as necessary) and re-approve documents;
    c. ensure that changes and the current revision status of documents are identified;
    d. ensure that relevant versions of applicable documents are available at points of use;

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e. ensure that documents remain legible and readily identifiable;
f. ensure that documents of external origin are identified, and their distribution controlled;
g. prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are to be retained for any purpose.

(d) procedures for the control of records;
(e) procedures for the Scheme Client's 'top management' to review its management system at planned intervals, in order to ensure its continuing suitability, adequacy and effectiveness in meeting the 'top management's' commitment to quality;
(f) to establish, document and maintain a process of internal audit conducted by knowledgeable, qualified and suitable personnel and ensuring the internal auditors do not audit their own work, any corrective actions identified are implemented and any appropriate opportunities for improvement are identified;
(g) to establish procedures for the identification and management of non-conformities in its operations; and
(h) to establish procedures for taking preventative measures to eliminate the causes of potential non-conformities.

Commitment to Data Protection and Privacy

5.6 All Scheme Clients shall, as far as is relevant to their activities, comply with the requirements of ACCS 2:2020 – Technical Requirements for Data Protection and Privacy ~~as approved by the UK Information Commissioners Office~~.

5.7 Scheme Clients shall not be subject to any current or unresolved regulatory action by a Data Protection Supervisory Authority (such as the Information Commissioner's Office) and shall be required to notify the Scheme within 72 hours of any reportable data breach or serious nonconformity under GDPR or any matter in relation to their certification under GDPR that could affect the status of their certification.

Subcontracting

5.8 All Scheme Clients are responsible for the activities of any sub-contractors or providers where they are directly relevant to securing compliance with these Scheme Rules. Contracts and memoranda of understanding with any service providers or their sub-contractors shall be available for inspection by the auditors (commercially sensitive information such as pricing can be redacted). Contracts should demonstrate security and probity and shall in particular follow stringent diligence processes in accordance with these Scheme Rules.

5.9 The Contract specification shall include provisions for:

(a) a commitment to quality equivalent to or exceeding the provisions of Section 5.4 to 5.5;

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(b) a commitment to data privacy, protection and security equivalent to or exceeding the provisions of Section 5.6 to 5.7;
(c) compliance with the relevant area of certification that is equivalent to or exceeding those standards.

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6. Approach to Evaluation and Assessment

Certification Body

6.1 The Certification Body shall operate the Certification Schemes covering the certification activities. The Certification Body shall be:

Age Check Certification Services Ltd
321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL
~~UKAS Accreditation Number 21037~~

6.2 The requirements against which the products of a client are evaluated shall be those contained in the specified standards and other normative documents (including those set out in Section 2 of these Rules) as appropriate.

6.3 The Certification Body may produce and make available on request such explanations about the requirements as have been appropriately formulated by relevant and impartial persons or committees, possessing the necessary technical competence, such as the Scheme Certification Panel.

Applications

6.4 A completed application in writing shall include:

a) the legal entity making the application for certification, where they are, what they do and the markets they operate in;
b) which Certification Scheme(s) are relevant to their activity, including a description of the products, processes or services to be certified and the standards and/or other normative documents that the client is seeking certification on;
c) the significant aspects of the applicant's process and operations, including any legal obligations that they are under;
d) a detailed description of the object of certification (Target of Evaluation) including any interfaces and transfers to other systems and organisations, protocols or other assurances;
e) general information about the business relevant to the Certification Scheme, such as their human or technical resources and any functions or relationships that they have within or with a larger corporation;
f) information concerning any outsourced processes that will affect conformity to the requirements of the Certification Scheme, including the contractual controls for third party outsourcing and including whether processors are used;

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g) if the applicant is a data processor (rather than a data controller), their responsibilities and tasks together with a copy of the contract or agreement between the relevant data controller and processor;
h) if the applicant is a joint controller with any other organisation, their responsibilities and tasks together with a copy of the contract or agreement between the relevant data controllers;
i) whether or not the applicant is the subject of any recent investigation or regulatory action by any law enforcement body including, but not limited to, Police, Financial or Fraud Investigators, Data Protection Supervisory Authorities, any Sectoral Regulator, Trading Standards or Licensing Authorities;
j) any other information that is relevant for initial evaluation and ongoing monitoring activities, including their technical ability to participate in electronic monitoring.

Application Review

6.5 An application review through a telephone interview with the applicant, shall be undertaken within 7 days of receiving a completed application in writing.

6.6 There is no fee charged for an application review.

6.7 The purpose of the application review is to ensure that the information about the client and the product, process or service is sufficient for the conduct of the certification processes. As a result of the application review an Auditor shall:

a) define the Scope of certification;
b) confirm the means available to perform all evaluation activities;
c) confirm the ACCS competence and ability to perform the certification activity;
d) confirm the technical and legal expertise in relation to data protection to an appropriate extent;
e) confirm a plan for pre-assessment, if this has been requested;
f) confirm a plan for audit and evaluation;
g) confirm that the applicant is not presently subject to regulatory action by the Data Protection Supervisory Authority, including by confirmation with the relevant authority;
h) determine that the applicant is a fit candidate for certification;
i) provide a Quotation for the Certification Services.

6.8 The Auditor shall draw to the attention of the Senior Certification Officer (or if they are the Senior Certification Officer, to the attention of the Chief Certification Officer) any application for certification for a type of product, process or service; normative document or certification scheme that ACCS has no prior experience of.

6.9 In cases under 6.8 above, ACCS shall ensure that it has the competence and capability for all the certification activities it is required to undertake and shall maintain a record of the

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justification for the decision to undertake certification. Such decisions shall be undertaken by at least two of the Senior Certification Officer, Chief Certification Officer, Chief Technical Officer or Chief Executive of ACCS.

Certification Agreement

6.10 Once the Application Review has been completed, ACCS shall ensure that a legally enforceable agreement for the provision of certification services to the client is in place. This agreement shall be in the form of the template agreement **ACCS Supply of Certification Services Agreement**.

6.11 The Certification Agreement shall be signed by the client prior to the commencement of pre-assessment or evaluation activities.

Pre-Assessment

6.12 At the request of the applicant, an Auditor may undertake a pre-assessment visit and provide a gap analysis. Auditors may not provide consultancy services, but can help the Applicant to understand the certification requirements.

Evaluation

6.13 Auditors shall prepare a plan for each evaluation activity, which shall be agreed with the client.

6.14 Auditors shall be satisfied on objective evidence that the applicant meets the requirements of the relevant standards. Auditors shall be granted permission, even if supervised, to the applicant's facilities including any data centres, clean rooms, file storage or secure locations wherever they are. If cloud-based approaches are utilised, Auditors may need to review the security arrangements for these. It is the responsibility of the Applicant to facilitate that authorisation.

6.15 Auditors shall undertake an assessment of a model approach to demonstrate the methodology and outcome anticipated by the applicant's age check process. The model approach shall include model outcome attributes (for proof-of-age ID providers, age check services or age exchange services) or the model input attributes (for relying parties). These model attributes can be used for comparative purposes for the real-time intelligent certification monitoring.

6.16 Auditors shall ensure that all necessary information and/or documentation is made available for performing the evaluation tasks.

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6.17 Auditors shall undertake a company-based site assessment for each location that is critical to demonstrating compliance with the Scheme rules. It is possible that an Auditor may determine that an on-site assessment is not necessary in the specific circumstances of the application. The Auditors shall ensure that:

(a) the staff carrying out work for the applicant are appropriately trained and monitored;
(b) the activities at the company-based site are undertaken in accordance with the documented procedures which are implemented to control all operations that are to be covered by the certification;
(c) training requirements are documented for any staff that are to conduct the activities to be certified;
(d) specific personnel are responsible for monitoring the training requirements of staff and the evaluation and approval of their competence;
(e) an internal audit process is in place to monitor site activities carried out under the scheme, on a sampling basis;
(f) records (not individual ID's) are retained for each activity undertaken as part of the Scheme.

6.18 Auditors shall only rely on evaluation results related to certification completed prior to the application for certification, where they are satisfied that body that performed the evaluation activities are managed in a manner which provides confidence in the results and that records are available to justify the confidence.

6.19 Auditors shall apply the requirements of Scheme Rules concerning Data Protection and Privacy to ensure that:

a) a method for assessing the necessity and proportionality of processing operations in relation to the Scheme Client's purpose and data subjects is in place;
b) a method for evaluating the coverage, composition and assessment of all risks considered by the data controller or processor with regard to the legal consequences of GDPR and with regard to the definition of technical and organisational measures in GDPR insofar as they apply to the object of certification, is in place;
c) a method for assessing the remedies, including guarantees, safeguards and procedures to ensure the protection of personal data in the context of the processing to be attributed to the object of certification and to demonstrate that the legal requirements as set out in the criteria are met, is in place.

Management Systems Audit

6.20 For any applicants that <u>do not</u> have a management system that is certified by an accredited Certification Body in accordance with the provisions of ISO 9001:2015, the Auditor shall undertake a management systems audit. This is to ensure that the Applicant has in place the

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policies and procedures to meet the appropriate scheme requirements to consistently operate the certified age checking service to the required quality.

Technical Evaluation

6.21 Auditors or a suitably qualified technical evaluator acting under the instructions of the Auditors shall undertake Technical Evaluation of the age verification system as appropriate. The evaluation methods shall be standardised and applied consistently. This means that comparable evaluation methods are used for comparable targets of evaluation. Any deviation in methodology shall be recorded and justified by the technical evaluator and reviewed by the Certification Officer. The Technical Evaluation can include any of the following activities, or any other relevant activities for the system submitted for evaluation:

(a) **Bona Fide Test Crew Presentation** – The Scheme can utilise a test crew for bona fide presentation to age verification systems. This can include for false/accurate accept rates; skin tone analysis; gender; age grouping; disfigurement; etc.

(b) **Presentation Attack Detection** – The Scheme can assess PAD for both human-likeness, but not liveness analysis and also for identity assets presentation (both genuine and false identity assets). The Scheme can utilise different presentation attack instruments, PAI species, and PAI series. The Scheme can test for 2D and 3D presentation objects. This is sometimes more commonly known as anti-spoofing testing.

(c) **Detection Device Analysis** – The Scheme can assess performance on multiple forms of detection devices – webcams, tablets, cameras, mobile telephones – different operating systems (such as Android, iOS, etc.) and at different presentation intensity, distance and angles. The Scheme can also test device integrated equipment, such as gaming machines or till systems, subject to them being made available to the Scheme at the testing studio.

(d) **Ambient and Directed Lighting Analysis** – The Scheme can assess system capabilities under different types of ambient light, either presented at the presentation object or at the detection device. This includes for different light levels from supermarket-style overhead LED lighting, to pub-style sodium lighting, to casino-style multi coloured lighting, to strobe lighting and anything in between. We also have the capability for internal and outdoor lighting. The lighting can be directed ambient to the presentation object (i.e. the person being age estimated) or the detection device (i.e. the camera) or both.

(e) **Electronic Identity Document Validation Technologies** – The Scheme can test system capabilities on identifying ID documents (such as Passports, Driving Licences or other official ID Cards), being able to extract relevant data from those documents (such as

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through Machine Readable Zones (MRZ) or Near Field Communication (NFC)) and present that data accurately to enable effective Age Determination.

(f) **Social Proofing** – The Scheme can assess the analysis, with a user's consent, of their digital footprint and the related social graphs, which can be interrogated to determine the veracity of a self-asserted identity. This is the ability of systems to gain proof of age through analysis of the social contacts a citizen has and asking those social contacts to verify or confirm the age attributes of the citizen.

(g) **Parental Consent** – The Scheme can assess the process of identifying and verifying a digital parent or capable guardian related to or responsible for a citizen and gaining verification of the age group of the citizen through information provided by that parent or capable guardian.

(h) **Biometric Subject Behaviours** – The Scheme can assess systems deployed for identifying and analysing subject behaviours (such as squeezing together one's fingers in hand geometry and a biometric presentation in response to a directive cue, which are both voluntary reactions).

(i) **In situ Testing** – The Scheme can test deployed units in real world scenarios. Typically, this comes after the initial certification and is part of the certification monitoring that is put in place to make sure that systems continue to perform as expected.

Non-Conformances on Audit

6.22 The Auditor shall inform the client of all non-conformities. All non-conformities shall be notified through the Scheme Certification Management System and be tracked and monitored. Non-conformities shall be notified to the Scheme Client at the latest, in the closing meeting of the audit.

6.23 Any non-conformity raised during an initial audit shall be responded to and closed prior to certification being granted. Where non-conformities are raised during a surveillance/ recertification audit, corrective action shall be taken, in line with the following schedule:

a) Major NCRs shall be closed within 4 weeks of the NCR being raised;
b) Minor NCRs shall be closed within 8 weeks of the NCR being raised;
c) Opportunities for improvement are advisory only, but where possible be dealt with prior to the next surveillance audit.

Review

6.24 The Auditor shall document the evaluation activities for review by a Certification Officer.

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6.25 A Certification Officer, being a person that was not an auditor or technical evaluator, shall review all information and results related to the evaluation to make a certification decision, which shall be completed concurrently with the review.

6.26 The Certification Officer shall be employed by ACCS. This decision cannot be outsourced.

6.27 The Certification Officer shall notify the client if they make a decision not to grant certification, and shall identify the reasons for the decision. Otherwise, the Certification Officer shall cause a Certificate of Conformity to be issued in accordance with Section 7.

Data Protection Supervisory Authority

6.28 The Certification Officer shall provide a draft certification decision to the Information Commissioner's Office together with an executive summary of the draft grounds for certification and shall:

a) secure the approval of the Commissioner to the issuance of certification;
b) verify that the applicant is not subject to current or previous regulatory action by the Commissioner; and
c) ensure that evaluation documentation is made fully accessible to the ICO upon request.

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7 Certificates of Conformity

7.1 ACCS shall be responsible for all its decisions and will not outsource or delegate responsibility for decision making.

7.2 The Applicant will be issued with an Evaluation Report and, where it demonstrates conformity with the required standards, a Certificate of Conformity. That report and certificate can be used to gain approval or accreditation from others (such as the PASS Board or Regulators).

7.3 The Certificate of Conformity remains the property of ACCS.

7.4 The Certificate of Conformity will contain:

a) the name and address of the certification body;
b) the date certification is granted (which shall not precede the date of the certification decision);
c) the name and address of the client;
d) the scope of the certification (which may be set out in a Schedule that is clearly referenced in the certificate of conformity);
e) the object of certification (including any version status or similar characteristics);
f) the term or expiry date of certification (which shall not exceed two years);
g) a unique reference number;
h) the signature and authorisation of the certification officer (this can be an electronic signature).

7.5 The Certificate of Conformity shall only be issued to the client if:

a) the decision to grant or extend the scope of certification has been made;
b) certification requirements have been fulfilled; and
c) the Certification Agreement has been completed and signed.

7.6 ACCS shall maintain a public registry of current certifications at www.accscheme.com/registry. The public registry shall include the certification mechanism, period of validity and under which framework or conditions certification is issued, an executive summary of the scope of certification, object of certification, applicable certification criteria used, evaluation methods used, tests conducted and results.

7.7 A copy of the Certificate of Conformity shall be provided to the Information Commissioner's Office.

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8 Certification Marks

8.1 The Certification Mark, shown below, shall only be used in accordance with the Regulations Governing the Use of the Certification Mark set out in Section 4:

8.2 The Certification Mark shall appear (once a certificate of conformity has been granted) on all age-related policies and publicly available explanations of the age check policies and practices of the Client.

8.3 The Scheme exercises control over the ownership, use and display of certificates, marks of conformity and any other mechanisms indicating that the product, process or service is certified through the Certification Agreement and these Scheme Rules.

8.4 A Certification Officer shall take appropriate action if the use or display of a Certification Mark is not consistent with the terms of certification.

8.5 A Certification Mark shall only be used in accordance with the guidelines on accreditation and certification issued under Article 42 and 43 of GDPR.

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9. Certification Monitoring

9.1 It is a condition of certification that scheme clients participate in real-time intelligence certification monitoring. The purpose of certification monitoring is to ensure the ongoing validity of the demonstration of fulfilment of the process or service requirements. Certification Monitoring shall be proportionate, risk based and documented.

9.2 All Scheme Clients shall have a process in place for counting the number of age check decisions that they make. An age check decision is made every time that:

(a) a Proof-of-Age ID Card is issued or reissued;
(b) a Proof-of-Age Electronic Token or App is activated for use by the individual;
(c) an age-related eligibility assurance (AREA) is provided to a third party;
(d) an individual crosses a threshold into an area that is age-restricted by law;
(e) an individual enters a domain with content that is age-restricted by law;
(f) an individual accesses a service that is age-restricted by law;
(g) an individual purchases or attempts to purchase content, goods or services that are age-restricted by law;
(h) any other circumstances where age-related eligibility is required to be determined by law.

9.3 All Scheme Clients shall have in place real-time intelligent monitoring for age check decisions, which shall include for a randomised sample (using a true random number generator (TRNG)) to be made available to an ACCS Auditor through a secure portal for review.

9.4 The randomised sample shall include the age attributes used by the Scheme Member to determine the age-related eligibility and is reviewed against the model approach identified in accordance with the Scheme Rules.

9.5 Monitoring activities take place in parallel and at the same time as the Scheme Member's age check activities based on a randomised sampling process. The methodology for sampling is agreed with the applicant prior to the certification decision being made. Monitoring does not hinder or replace the age check decisions. As a part of the requirements for data minimisation, Scheme Clients are not required to keep evidence of age check records for a future audit.

9.6 For all situations except monitoring in physical outlets by relying parties, certification monitoring takes the form of sharing the basis and grounds for the age check decision for the randomly selected sample electronically with the ACCS certification officer at the same time as the age check decision is made through a secure portal. It is then reviewed by the ACCS Certification Officer and a notification of conformance or non-conformance is issued

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within 7 days. This does not prevent, hinder or delay the age check decision. Once reviewed, the attributes reviewed are permanently deleted from the portal. ACCS do not download or keep the evidence of age checks.

9.7 For all situations in physical outlets by relying parties (i.e. ID checks in retail premises) the certification monitoring takes the form of sending a person aged 18 or 19 into the premises to carry out a test purchase. The frequency of test purchases is determined based on the monitoring frequency for age checks completed per outlet. The test purchasing can be undertaken by a contractor approved by ACCS. Following a test purchase, a notification of conformance or non-conformance is issued within 7 days.

9.8 The frequency of certification monitoring is based on several factors:

a) the number of age checks that the Scheme Member undertakes;
b) the number of outlets or domains that the Scheme Member operates from;
c) if the age check decisions are automated or involve individual human judgements to be made;
d) the vectors of trust that are adopted for age checking by the Scheme Member;
e) the type of age check business (Proof-of-Age ID Provider; Age Check Provider; Age Check Exchange Provider; or Relying Party);
f) any regulatory requirements or considerations.

9.9 Certification Monitoring will result in a notification of conformity or non-conformity as appropriate. A notification of non-conformity will include the actions required to be taken to achieve conformity.

9.10 A Scheme Client with persistent non-conformity may be placed on accelerated monitoring, or certification may be suspended, withdrawn or cancelled.

9.11 The length of the certification period is determined by several factors:

a) whether the Scheme Member reaches a number of age checks that are permitted within certification (called the 'age check cap');
b) the number of outlets or domains that a relying party operates;
c) if the age check decisions are automated or involve individual human judgements to be made;
d) the type of age check business (Proof-of-Age ID Provider; Age Check Provider; Age Check Exchange Provider; or Relying Party);
e) any regulatory requirements or considerations.

9.12 The certification period will not last for more than two years. Any certification monitoring shall not be more than 12 months apart at the most.

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10. Issues after Certification

Changes affecting certification

10.1 If a change takes place to the Scheme, the relevant technical requirements, the normative documents or legal provisions, a Certification Officer shall ensure that those changes are communicated to all affected clients. The Certification Officer shall verify the implementation of the changes by the affected clients and shall take actions required by these Scheme Rules. In addition, the Scheme shall take appropriate action in response to any changes as a result of:

a) any personal data breach or infringement of GDPR or the DPA 18 reported by the client or the ICO;
b) any amendments to data protection legislation;
c) the adoption of delegated acts of the European Commission in accordance with Articles 43(8) and 43(9);
d) decisions, opinions, guidelines, recommendations or best practices issued by the European Data Protection Board; and
e) court decisions related to data protection.

10.2 The Scheme may be amended from time to time in order to keep up to date with legislation, changes to standards, industry practice, or in order for ACCS to run the Scheme more effectively. Where possible, agreement will be sought prior to any changes, however ACCS retains the final decision on whether a modification to the Scheme is acceptable. The change procedures adopted shall include suitable transition periods, approval by a competent supervisory authority, reassessment of the relevant object of certification and appropriate measures to revoke the certification if the certified processing operation is no longer in compliance with the updated criteria.

10.3 ACCS will communicate the Scheme Amendments to the Client and ensure that the communication has been received and understood. ACCS will then verify that the changes have been implemented by the Client. This may be by means of testing, surveillance, audit or any other means that ACCS consider appropriate in order to ensure that the change has been implemented. This will be a contractual arrangement.

10.4 ACCS may need to withdraw the Scheme from the market. Where this is the case, ACCS will give 6 months' notice, after which the Certification Scheme will be inactive and no longer be supported. At the end of the six-month period, the Member shall immediately cease to promote or claim compliance with the Scheme and remove all references to the Scheme from its promotional literature.

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10.5 If other changes affecting certification occur, including changes initiated by the Scheme Client, a Certification Officer shall consider the changes and shall decide upon the appropriate action to take. This could include, if required, the following to be conducted in accordance with the relevant provisions of these Scheme rules:

a) Evaluation;
b) Review;
c) A new certification decision;
d) Issuance of revised certificates of conformity;
e) A revision to monitoring activity;
f) Such other actions that are necessary and proportionate to maintain confidence in the integrity of the certificates of conformity issued.

10.6 The Certification Scheme, including certifications issued, may be affected by a decision by UKAS to terminate, reduce, suspend or withdraw accreditation of the Scheme, or by the Information Commissioner's Office to withdraw approval of the Scheme. In the event that this occurs, the Scheme shall consider the implications of the termination, reduction, suspension or withdrawal of accreditation and may take appropriate action to affected certifications, including the potential withdrawal of the scheme and notification to the Scheme Clients and Applicants.

Termination, reduction, suspension or withdrawal of certification

10.7 When a nonconformity with the requirements of the Scheme, including these Scheme Rules, is identified and substantiated, by whatever means, a Certification Officer shall decide on appropriate action, which can include the following:

a) continuation of certification under conditions specified by the Certification Officer (such as enhanced monitoring or submission of revised objective evidence of conformity);
b) reduction in the scope of certification to remove nonconforming product, process or service variants, but this should not result in a misleading impression being formed of the scope of certification;
c) suspension of the certification pending remedial action by the Scheme Client; or
d) withdrawal of the certification.

10.8 Notwithstanding the generality of the appropriate actions described in 10.6, a Certification Officer may issue a 'Minded to…' notice to a Scheme Client where the Certification Officer is minded to take a particular course of action, but wishes to give the Scheme Client appropriate opportunity to rectify the nonconformity.

10.9 Examples of nonconformities include any of the technical requirements relevant to the scope of certification, but also include any:

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a) refusal to accommodate audits for the Scheme;
b) failure to modify processes to meet the Scheme requirements;
c) failure to resolve non-conformities within the required timescales;
d) misuse of the Certification Scheme Marks;
e) making false claims about services which are covered by the Scheme;
f) failure to settle any ACCS invoices within the required timescales;
g) failure in the member's duty of candour to the Scheme.

10.10 If certification is terminated (by request of the client), suspended or withdrawn, the Certification Officer shall take action to:

a) cancel the certificate of conformity issued;
b) remove the record of certification from the Scheme Registry;
c) ensure that all indications known to the Scheme that the product, process or service is certified are removed, including any made by the client and any that may appear on third party sources – such as trade associations, regulators, consumer or business information services;
d) ensure that authorisations for the use of the certification mark are revoked;
e) issue a 'certification bulletin' to any relevant regulators that the certification is suspended, withdrawn or cancelled (this includes notification to the ICO in accordance with the requirements of the certification agreement).

10.11 If certification is suspended, the Certification Officer shall communicate to the Scheme Client the actions needed to end suspension and restore certification for the products, processes or service in accordance with the Scheme and any other actions required by the Scheme.

10.12 If certification is reduced, the Certification Officer shall take action to make all necessary modifications to the Certificate of Conformity and the Scheme Registry (including any requirements to cease or reduce the use of the Mark of Conformity) in order to ensure the reduced scope of certification is clearly communicated to the Scheme Client and is clearly specified in the Certificate of Conformity and Scheme Registry. The Certification Officer shall also issue a 'certification bulletin' to any relevant regulators that the certification is suspended, withdrawn or cancelled (this includes notification to the ICO in accordance with the requirements of the certification agreement).

10.13 Any evaluations, reviews, decisions or reinstatements of certification following a period of suspension, shall be completed in accordance with the relevant sections of these Scheme Rules.

Records

10.14 ACCS shall retain records to demonstrate that all certification process requirements have been effectively fulfilled.

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10.15 Except for the personnel conducting the evaluation or representing the client, the records obtained during the certification shall not contain Personally Identifiable Information (PII) relating to any member of the public. Where audit records include reference numbers relevant to a process involving a member of the public, that shall not be considered PII unless the audit record also contains information enabling that record to be linked to an individual member of the public.

10.16 ACCS records shall be kept for not less than 4 years and thereafter shall be destroyed in accordance with the records destruction requirements of the ACCS information governance procedures. The 4 year period is intended to cover at least the current cycle of recertification (every 2 years) and the previous cycle.

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11. Complaints and Appeals

11.1 The Scheme shall maintain a publicly available complaints process at https://www.accscheme.com/make-a-complaint-against-us.

11.2 The Scheme regards:

a) a complaint against the service as being any expression of dissatisfaction by any person with the service provided by the Scheme, its Conformity Assessment Body, any staff or contractors or any of the systems or process involved, excluding any decision or determination of a Certification Officer;
b) a complaint against a certified client or applicant as being any expression of dissatisfaction by any person about the conduct or behaviour of a Scheme Client specifically related to either the scope of certification of that Client or the potential to bring the Scheme into disrepute;
c) an appeal as being against any decision or determination made by a Certification Officer.

NOTE: Decisions made or positions adopted by auditors or technical evaluators are not subject to appeal until after they have been reviewed and a decision is made by a Certification Officer, but the behaviour or conduct of auditors or technical evaluators can give rise to a complaint against the service.

11.3 The person assigned to deal with the complaint or appeal shall not have either worked for or provided consultancy relating to the certification of the complainant for at least 2 years. They shall also not have been involved in the activity which the complaint or appeal relates to.

Complaints against the service

11.4 Complaints shall be dealt with in accordance with the documented complaints process of the Scheme. A record and tracking of all complaints shall be maintained in accordance with the ACCS Integrated Quality Management System.

11.5 In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate. However, if this is not possible, the complaint should then be reviewed and approved by person(s) not involved in the certification activities related to the complaint.

11.6 All complaints shall be acknowledged in writing by the person handling the complaint within a maximum of two weeks, and will say who is dealing with the complaint and when the complainant can expect a reply. A definitive reply should be provided within four weeks. If

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this is not possible because, for example, an investigation has not been fully completed, a progress report will be provided to the complainant with an indication of when a full reply will be given.

11.7 Where appropriate, the person handling the complaint should describe the action taken to investigate the complaint, the conclusions from the investigation and any action taken as a result of the complaint.

11.8 If the complainant is of the view that the problem has not been satisfactorily resolved, they can appeal the outcome and request that the complaint is reviewed at Chief Officer level. The Chief Officer concerned should provide confirmation of the escalation of the complaint, who is dealing with it and when the Complainant can expect a reply, within two weeks, and a formal response within a maximum of four weeks.

11.9 The determination of a Chief Officer may be reviewed by an Independent Mediator if the complainant remains dissatisfied. The Scheme will facilitate this process and the Mediator will be appointed by the Centre for Effective Dispute Resolution. The Scheme will pay 50% of the cost of an Independent Mediator. In its absolute discretion, the Scheme may pay the other 50% of the cost of an Independent Mediator where a Chief Officer determines that:

a) the complaint is not frivolous or vexatious;
b) the complainant is a private individual; and
c) the complaint raises an important point for consideration by an Independent Mediator.

Complaints against a Scheme Client

11.10 All Scheme Clients shall maintain their own effective consumer or public complaints procedure. Where a complaint is received by ACCS, the complainant will initially be directed to deal with the Scheme Client in the first instance. If this does not resolve the complaint, ACCS may provide an independent assessment of the complaint using its Complaints Procedure set out in Section 11.3 – 11.9. Failure of the member to implement any corrective actions because of the complaint may result in suspension or withdrawal of certification.

11.11 A record of all complaints made against a Scheme Client shall be kept and tracked.

11.12 A Chief Officer of the Scheme may decide it is appropriate to seek external assistance with resolution. Irrespective of this, the complainant has the right to challenge the decision by referral to an independent mediator as set out in Section 11.9.

Appeals against a Certification Officer's Decision

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11.13 An applicant or holder of certification may appeal against a Certification Officer's decision. An applicant or holder of certification cannot appeal against a Certification Officer issuing a 'Minded to…' notice to the Scheme Client under section 10.7 until such time as the Certification Officer has reached a final decision.

11.14 The Scheme Client may submit their appeal in writing or by visiting: https://www.accscheme.com/appeals-against-certification-decisions.

11.15 An Appeal against a Certification Officer's decision shall initially be considered by that Certification Officer to determine whether or not new information or objective evidence is disclosed by the Appeal that could cause the Certification Officer to review the decision appealed.

11.16 Thereafter, the appeal shall be considered by a Senior Certification Officer, Chief Certification Officer or Chief Executive. All appeals shall be acknowledged in writing by the person handling the appeal within a maximum of two weeks, and will say who is dealing with the appeal and when the appellant can expect a reply. A determination of the appeal should be provided within four weeks. If this is not possible because, for example, an investigation has not been fully completed, a progress report will be provided to the appellant with an indication of when a determination of the appeal will be completed.

11.17 Where appropriate, the person handling the appeal should describe the action taken to investigate the Certification Officer's decision, the conclusions from the investigation and any action taken as a result of the appeal.

11.18 If the appellant remains dissatisfied, they can ask to refer their appeal to a Certification Panel who can review the Certification Officer's decision. The members will have industry or technical competence in the relevant product category, will be independent from the Age Check Certification Scheme and their decision on the merits of the appeal will be considered as final.

11.19 The Panel shall only be able to consider the evidence available to the Certification Officer at the time of the decision. If additional evidence is required or provided, this may result in the decision being remitted to the Certification Officer for re-evaluation.

11.20 The Panel may:

a) uphold any final decision of the Certification Officer;
b) remit any final decision of the Certification Officer back to them with directions to obtain or consider additional evidence; and/or
c) revoke any final decision of the Certification Officer.

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12. Impartiality

12.1 ACCS is committed to ensuring impartiality, independence, transparency, consistency and fairness and avoiding any conflict of interest. Information about securing impartiality is available at https://www.accscheme.com/governance.

12.2 ACCS has put in place policies and procedures to manage impartiality and to ensure that the certification activities are undertaken impartially. Certification will not be restricted to applicants on the grounds of undue financial or other limiting conditions. Applications and procedures have been designed so as not to unfairly impede or inhibit access by applicants, candidates or clients. All ACCS employees, contractors or committees shall act impartially.

12.3 ACCS has developed an Impartiality and Independence Policy Statement that is publicly available without request. It will not allow commercial, financial or other pressures to compromise impartiality. In order to analyse, document and eliminate or minimise the potential for conflict of interest arising from its certification activities, ACCS has developed an Impartiality Risk Register. The Risk Register is an ongoing working document, used to continually assess threats to impartiality. It is used in conjunction with other documentation, such as Interview Assessment Records, CVs, Contracts, etc.

12.4 ACCS has established an Impartiality Panel to provide independent review and oversight of quality management certification activities. The Panel consists of the Chief Executive of the Scheme and at least two independent members. The role of this Panel is to review the Scheme's certification activities and verify that they are performed impartially without undue influences that might affect the impartiality of services offered.

12.5 The main responsibilities of the Impartiality Panel are:

a) to assist with the development of policies relating to the impartiality of the Scheme's certification services;
b) to periodically review the impartiality of the Scheme's certification processes;
c) to advise on matters affecting confidence in certification, including openness and public perception;
d) to prevent commercial or other considerations from affecting the objective provision of certification services; and
e) to ensure that the actions of the panel itself do not present any risks to impartiality.

12.6 ACCS Employees will not be certified under this Scheme. ACCS management, review and certification officers shall not be involved in the activities of any legal entity that offers or produces the certified product, process or service. In addition, personnel of a client or applicant shall not be involved in the management of ACCS, the review, or the certification decision.

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12.7 ACCS, its employees or any part of its corporate structure shall not:

a) be the designer, manufacturer, installer, distributor or maintainer of the certified product;
b) be the designer, implementer, operator or maintainer of the certified process;
c) be the designer, implementer, provider or maintainer of the certified service;
d) offer or provide consultancy services to its clients;
e) offer or provide management system consultancy or internal auditing to its clients.

12.8 ACCS may implement, maintain or operate a product, process or service where this is necessary for the purpose of evaluation of the product, process or service.

12.9 ACCS shall not be marketed or offered as linked with the activities of any organisation that provides consultancy, nor shall ACCS state or imply that the use of any particular consultancy organisation would make certification simpler, easier, faster or less expensive.

12.10 Access to services provided by ACCS shall be available to all applicants whose activities fall within scope of the scheme. No application shall be conditional upon the size of the client or membership of any association or group, nor shall certification be conditional upon the number of certifications already issued.

12.11 A Certification Officer or any ACCS employees involved in the review or decision making process shall not have worked for or provided consultancy to any Scheme Client for a period of at least two years prior to their activity for ACCS.

12.12 ACCS shall confine its requirements, evaluation, review, decision and monitoring to those matters specifically related to the scope of certification.

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13. Confidentiality

13.1 Except for information that the applicant makes publicly available, or when agreed between the applicant and ACCS, or where outlined in the requirements of the Scheme(s), or as required by an oversight body, ACCS agree to treat as confidential all information obtained or created during the performance of the certification activities. This includes information about the applicant obtained from sources other than the applicant, provided however that ACCS may release confidential information as required by law or authorised by contractual arrangements, in which case, unless prohibited by law, ACCS will provide the applicant details of the information released.

13.2 The applicant provides ACCS with a specific confidentiality waiver in order to share information about them or their product, process, people or services with:

a) any certification body that had previously certified the Age Check Scheme;
b) any certification body to whom they wish to apply for certification of a product, process, people or services that ACCS currently or have previously certified; and
c) any regulator (including the Information Commissioner's Office) that is responsible for age-restricted content, goods or services enforcement.

13.3 Where the applicant discloses details of any of ACCS's reports or certification decisions to any third party, they shall be presented in full and shall not be amended or presented in any format that may mislead the recipient.

13.4 ACCS shall maintain and make available on request:

a) information about (or reference to) the certification schemes (available at https://www.accscheme.com/services/policy-development/standards);
b) information about (or reference to) evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification; this includes a high-level explanation of the certification procedures and the respective periods of validity (contained in these Scheme Rules, which are available at https://www.accscheme.com/guaranteed-independence-impartiality);
c) the current and previous versions of any technical requirements approved under Article 42(5) of GDPR;
d) a description of the means by which ACCS obtains financial support (available at https://www.accscheme.com/governance);
e) general information on the fees charged to applicants and to clients (available by submitting a request at https://www.accscheme.com/contact);

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f) a description of the rights and duties of applicants and clients (contained in these Scheme Rules, which are available at https://www.accscheme.com/guaranteed-independence-impartiality);

g) a description of the requirements, restrictions or limitation on the use of the certification body's name and certification mark and on the ways of referring to the certification granted (available in the Scheme Brand Guidelines provided to applicants on the issuance of a Certificate of Conformity);

h) information about procedures for handling complaints, including the information required by Article 43(2) of GDPR (available at https://www.accscheme.com/make-a-complaint-against-us);

i) information about procedures for handling appeals, including the information required by Article 43(2) of GDPR (available at https://www.accscheme.com/appeals-against-certification-decisions).

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14. Certification Fees

14.1 The Scheme Client will be charged fees based on the schedule of fees provided to applicants. The cost of certification will be estimated during the application review and the applicant will be required to pay 40% of that estimate to proceed with the application. The remaining 60% (or remaining fee if the estimate proved inaccurate) is due prior to a certification decision being made.

14.2 The applicant will also be charged the reasonable travel and accommodation expenses at the rate set out in the Schedule of Fees.

14.3 Scheme Clients will receive an invoice for any fees and charges, setting out VAT registration details and the amounts due. All invoices shall be settled within 30 days. If the Member requires ACCS to quote a purchase order reference on an invoice, they shall supply this in advance.

14.4 Fees are subject to annual review.

14.5 General information about the fees chargeable to applicants and clients for certification are available on request.

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About ACCS

The Age Check Certification Scheme is an independent not-for-profit certification scheme for providers of age restricted goods, content or services. We check that age systems work. Our scheme, backed by the Northern Powerhouse Investment Fund, can be utilised to provide full conformity assessment in accordance with all aspects of age restricted sales. We offer a range of services, including Test Purchasing, which deploys our award-winning Android & iOS App, and have a self-built state-of-the-art Age Check Test Studio which enables the scientific examination of age check systems.

Internationally recognised Standards

Our scheme provides evidence that your age check practices meet international standards.

Highly qualified certification officers

Our locally sourced certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check Certification Scheme

www.accscheme.com

An independent not-for-profit company registered in England and Wales (11493870) at Unit 321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL

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Age Check
Certification Scheme

Standards and Technical Requirements

ACCS 1:2020

Technical Requirements for Age Estimation Technologies

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ACCS 1:2020

Technical Requirements for Age Estimation Technologies

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Introduction

Age Estimation is the analysis of a citizen's age based on biometric features, such as facial image analysis, although age estimation can be accomplished using different biometric traits. This standard is intended to provide assurance for users of age estimation technologies when deployed as age check gateways, that they will work as intended.

Traditionally, age estimation is undertaken by natural persons, in a wide range of settings, all of the time. These natural persons make a judgment, based on a person's appearance, whether they are old enough to purchase age-restricted goods, content or services.

Some examples of products whose sale is controlled by age restriction are:

- Alcohol
- Cigarettes, including E Cigarettes (and Vaping Products)
- Lottery tickets and scratch cards
- Dangerous Weapons, e.g. crossbows, knives.

With the advancement of technology, the ability to undertake age estimation electronically is fast emerging. The Age Check Certification Scheme (ACCS) has put together this standard to determine if age estimation technology is fit for deployment for a given challenge age category. For example, a Challenge 25 category means that anyone younger than 25 should be challenged for ID to ensure that they are over 18.

The standard envisages that age estimation technology is rapidly advancing and accuracy levels are always improving. In setting requirements around accuracy levels, these are assessed on the basis that of the minimum 'challenge age' that the technology is fit and safe to be deployed in is identified. So, for instance, a particular age estimation technology may 'pass' and be certified as fit for use at 'Challenge 25' or 'Challenge 28' or indeed any other age.

It is worth noting that the applicable tolerance levels are much wider for the older the challenge age, so it is intended that users seeking to commission this type of technology as a part of their age verification processes, can have greater confidence in those certified with a lower challenge age category.

The methodology used to assess the accuracy of the technology have been developed in conjunction with Chartered Statisticians and considered by regulators, trade bodies and interested parties as an appropriate methodology.

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1. Scope

The Age Check Certification Scheme (ACCS) Standards are applicable to scheme clients submitting age estimation technologies for certification from ACCS and wish to have access to use of the ACCS certification mark as a mark of conformity for the technology.

This part of the ACCS Standards:

- establishes the definitions applicable to age estimation technology testing;
- identifies the target of evaluation for age estimation technology testing;
- sets the test protocols for biometric data subject capture;
- identifies the key metrics of mean absolute error, upper tolerance level and absolute tolerance level;
- sets the sample sizes to be undertaken for given levels of confidence and reliability required;
- establishes the requirements for age estimation technologies to demonstrate conformity and be fit for deployment;
- secures that inherent bias on the grounds of gender or skin tone in age estimation technology is below an acceptable tolerance.

The suite of ACCS Standards are applied as applicable to the activities of clients certified by ACCS. This will be dependent on the scope of operations of the providers and the services that they provide.

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2. Normative References

Legal Provisions

National and International Standards

ISO 4246:1994 - Cinematography — Vocabulary.

ISO/IEC 19794-1:2006 - Information technology — Biometric data interchange formats — Part 1: Framework.

ISO/IEC 19795-6:2012 - Information technology — Biometric performance testing and reporting — Part 6: Testing methodologies for operational evaluation.

Other Documents

Fitzpatrick, T. B. (1975). "Soleil et peau" [Sun and skin]. Journal de Médecine Esthétique (in French) – The 'Fitzpatrick Scale'.

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3. Terms and definitions

In this document:

"shall" indicates a requirement

"should" indicates a recommendation

"may" indicates a permission

"can" indicates a possibility or a capability

GUIDANCE NOTES *are shown in italic text and are intended to assist the reader with understanding provisions.*

When referring to the ACCS Standards, refer to the ACCS Standard, followed by the year of issue, followed by the provision – such as **ACCS 0:2020, 4.3.**

3.1 **absolute tolerance level**	is the level at which the age estimation technology will not return an age estimation above during the evaluation.
3.2 **age estimation technology**	is a system or process that captures inherent biometric features of a citizen and provides an estimation of the age of that citizen by reference to an artificial intelligence algorithm.
3.3 **algorithm**	a sequence of instructions that tell a biometric system how to solve a particular problem, in this context the estimation of the age of the biometric data subject [ISO/IEC 19794-1:2006, 3.3 modified for context].
3.4 **ambient lighting**	illumination within an area produced by scattered light or general lighting conditions [ISO 4246:1994, 15]. *Note: Ambient light can be natural or artificial light. Ambient light is generally uncontrolled and can be highly variable, posing a possible risk to image capture quality.*

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3.5 **biometric data subject**	individual whose individualised biometric data is captured by the age estimation technology.
3.5 **challenge age**	is a term used to describe the age at which a provider of age restricted goods, content or services may cease to require a potential customer to prove their age by means of producing evidence of their age. *Note 1: The term 'Challenge 25' is broadly used to describe a situation where a customer appearing to be under 25 should be asked to provide proof that they are over 18 to purchase age restricted goods, content or services.* *Note 2: This is not always referred to as 'Challenge' - some industries use 'Think 21', 'Measure 25', Assess 30' or various other combinations.*
3.6 **confidence interval**	the range of analytical error expected to contain the true value with a stated uncertainty as estimated from a statistical model of the measurement process.
3.7 **Fitzpatrick Scale**	means a scale of skin tones established by Thomas B. Fitzpatrick in *Fitzpatrick, T. B. (1975). "Soleil et peau" [Sun and skin]. Journal de Médecine Esthétique (in French).* *Note: The Fitzpatrick Scale is widely used in biometric data analysis to describe the skin tones of biometric data subjects.*
3.8 **inherent bias**	is the systematic error of an age estimation system to return an accurate result due to the existence of a protected characteristic of the biometric data subject, such as gender or skin tone. *Note: Local legislation is likely to define protected characteristics in equalities legislation, but for the purposes of this standard, the relevant protected characteristics are likely to be gender and race (insofar as skin tone is a proxy of race).*
3.9 **mean absolute error**	is a measure of errors (specifically the absolute difference) between paired observations expressing the same phenomenon.
3.10 **mean absolute error tolerance**	is a factor of the absolute tolerance level as calculated in accordance with paragraph 5.11.

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3.11 **nominal age**	is the age at which the age estimation technology is aiming to estimate with accuracy.
3.12 **performance throttling**	is any pre-programmed action by the age estimation technology that excludes or nullifies results generated by the algorithm that exceed stated tolerances.
3.13 **protected characteristic**	an aspect of a person's identity that is given legal protection to prevent discrimination, such as gender or race.
3.14 **presentation attack instrument (PAI)**	a biometric characteristic or object used in a presentation attack, such as a mask, mannequin or a genuine instrument that has been amended.
3.15 **target of evaluation (ToE)**	is the age estimation technology that is the subject of the evaluation.
3.16 **test crew**	are the selected biometric data subjects whose use of the target of evaluation is controlled or monitored as part of the evaluation [ISO/IEC 19795-6:2012(en), 4.17, modified for context]. *Note: In an operational evaluation, test subjects can be subjects of the operational system or they can be members of a test crew using the system specifically for evaluation purposes.*
3.17 **tethering**	is the connection of a device to a power or data source, but physical connection or wireless connection (such as Bluetooth ® or Wi-Fi).
3.18 **upper tolerance level**	is a factor of the absolute tolerance level as calculated in accordance with paragraph 5.13.

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4. Target of Evaluation

Scope of the Age Estimation Technology under Evaluation

4.1 The scope of the age estimation technology under test shall be defined and recorded on the certification agreement.

4.2 The scope shall include:

(a) the name given to the age estimation technology by the client;
(b) the operating parameters of the age estimation technology including:
    a. any process limitations;
    b. any prerequisites for operation;
    c. any tethering required (such as connectivity) for operation;
    d. any technological requirements;
    e. any performance throttling applied to the output of the technology (such as disregarding results through uncertainty assessments);
(c) the version or deployment reference of the target of evaluation.

4.3 The nominal age of the required test crew shall be identified.

The nominal age is the age at which the age estimation technology is aiming to estimate with accuracy. So, for instance, if the age gateway restriction is '18', then the nominal age will be 18.

Hardware Requirements for Age Estimation Technology under Evaluation

4.4 A scheme client may:

(a) supply their own hardware for the system under test; or
(b) utilise hardware provided by the scheme.

The hardware utilised during the test shall be recorded.

4.5 Where the scheme client is intending that the age estimation technology will be reliant upon the deployment of their own image capture equipment, then they may submit this equipment to be used to perform the test.

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4.6 Where the scheme client is intending that 3rd party image capture equipment will be utilised (such as a camera on a smart phone or integrated to IT equipment) then the Scheme Certification Officer will select suitable testing equipment which shall have:

(a) a minimum pixel count of 20 Megapixel;
(b) a pixel size of at least 1.5 µm; and
(c) a focal length of at least 15mm, but not exceeding 30mm.

Environmental Requirements for the Target of Evaluation

4.7 The ambient lighting level during the testing shall be recorded (in lux, to within +/- 50 lux).

4.8 The ambient light shall either be:

(a) A broadly consistent level of lighting (+/- 50 lux) with an absence of glare, flicker, stroboscopic effects, veiling reflections or interference; or

(b) Deliberately controlled lighting, the parameters of which shall be recorded that tests the efficacy of the age estimation technology under:
   a. Glare – which occurs when one part of the visual field is much brighter than the average brightness to which the detection device is adapted.
   b. Colour effects – different artificial light sources, or daylight under changing sky conditions, can negatively affect the detection device and cause variance in colour.
   c. Monochromatic light sources – low-pressure sodium discharge lamps can stop colours being identifiable and affect the performance of the detection device.
   d. Stroboscopic effects – occur when Presentation Attack Instruments appear to be stationary or moving in a different manner, confusing the detection device.
   e. Flicker – is light modulation at lower frequencies (about 50 Hz or less) which can sensitise the detection device. It is especially detectable at the edges of the visual system's field of view.
   f. Veiling reflections – high luminance reflections (which may be sharp-edged or vague in outline) which overlay the detail of the Presentation Attack Instrument and can affect detection device performance.
   g. Infrared and ultraviolet radiation – some lamp designs produce significant emissions at infrared and ultraviolet wavelengths, affecting the detection device.

4.9 The scheme certification officer shall record any other environmental factors that may have a material impact on performance of the target of evaluation.

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Assessment of Results

4.10 A test crew subject shall be presented to the Age Estimation Technology for a maximum of 8 seconds.

4.11 The age estimation technology shall present the result of its algorithm in single whole years.

Note 1: The user interface for the technology should state the age, in whole years, that it estimates the test subject to be. This does not prevent a scheme client from having a more granular age estimation (such as years, months or days) or the assessment being conducted at a more granular level, but that granularity is not required for the performance of the test and statement of results.

Note 2: A user interface that provides age classification (i.e. the subject is 'over 30') may be sufficient for deployment, but shall not be sufficient for evaluation of the system performance under this standard.

4.12 Unless otherwise stated by the certification officer, all results of tests undertaken under this standard shall be stated to:

(a) with a level of reliability and confidence as determined by the sample size (see paragraph 5.2);
(b) with such operating parameter limitations as identified in paragraph 4.2 (b);
(c) with such description of the ambient lighting of the test as identified in paragraph 4.8;
(d) with such description of any other material environmental factors as identified in paragraph 4.9.

4.13 The outcome of the test shall state the absolute tolerance level that the age estimation technology is capable of operating to in whole years.

Note 1: The absolute tolerance level is described in section 5.15.

Note 2: The absolute tolerance level may sometimes be described as the 'challenge age', i.e. the age at which a provider of age restricted goods, content or services may have set that it would seek to ask an individual apparently under that age to provide proof of age to demonstrate that they are over the nominal age as a part of their age verification policy. This is sometimes known in industry as 'Challenge 25' or 'Think 21' etc.

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5. Testing Protocols

Sample Size

5.1 The Scheme shall maintain access to a test crew, the identity and age of which has been verified by reference to official documentation in accordance with the Scheme Rules.

5.2 The sample size shall be determined by reference to Annex 1 – Determination of Sample Size.

5.3 The sample size determines the level of confidence and reliability that can be applied to the results of the test.

Note 1: A sample size of 2,995 presentations will mean (if the parameters of the test results are within the tolerances set out in this standard) that, estimated with 95% confidence, the likelihood of the age estimation technology falsely showing a person of the nominal age (i.e. 18) as being older than the absolute tolerance level (i.e. 25) is between zero and 1 in 1,000 presentations.

Note 2: Whilst ultimately it is a matter for the courts to determine, a level of accuracy as set out in Note 1 would be likely to be considered as exercising all reasonable precautions and exercising all due diligence if the age estimation technology were to be deployed in circumstances where local legislation provided for such tolerances to be applied.

Note 3: Statistically, it is not possible to state with absolute certainty that a false result would never be achieved (unless the whole population were tested). The higher the sample size, the lower the risk of false results (assuming the parameters of the test results are within the tolerances), but the sample size needs to be kept proportionate and reasonable to the purposes and use of the target of evaluation.

5.4 A minimum of 10% of the test crew used during the testing procedure shall be members of a test crew identified by the scheme certification officer and utilise images or presentations not previously seen by the age estimation technology.

Note 1: It is possible for the scheme client to participate in a test supervised by a certification officer utilising images of a test crew held by the scheme client (up to 90% of the images used). Where this is the case, the images utilised by the certification officer shall be analysed to ensure that there is no substantial deviation from the overall test crew utilised. This provision is intended to accelerate the process of testing, minimise the use of personal data and reduce costs.

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Sample Population

5.5 The test crew population shall be representative of the population in terms of both gender and skin tone so that the results reflect what the age estimation technology is expected to observe in the population to which the technology will be applied.

5.6 The gender and skin tone of the test crew shall be recorded.

Note 1: Gender records shall be in the form M, F or X.

Note 2: Skin tone records shall be in accordance with the Fitzpatrick Scale Type I – VI.

5.7 The true age of the test crew shall be not more than +/- 12 months of the nominal age applied to the target of evaluation.

Note 1: So where the nominal age under test is 18, the members of the test crew shall have reached their 17th birthday and shall not have passed their 19th birthday in order to be eligible to be used in the test crew.

5.8 The scheme client shall provide evidence (from their internal testing) that the accuracy of the age estimation technology is approximately constant across different nominal ages.

Note 1: This is an assessment of whether or not the error is similar for (say) a 12 year old, as it is for an 18 year old.

Note 2: Scheme clients are not expected to have structured test data for this check and are not expected to have results for infants or elderly citizens.

Acceptable Test Results

5.9 In order to pass the test, the target of evaluation shall achieve results that show:

(a) the mean absolute error and the predicted mean age is within acceptable tolerances;
(b) the number of results above the upper tolerance level are within the acceptable limits;
(c) no results above the absolute tolerance level; and
(d) the inherent bias for gender and race is within acceptable limits.

5.10 Annex 2 contains an illustrative table of the tolerance levels described in this standard and Annex 3 contains some illustrative examples of test results showing acceptable and unacceptable levels of estimation error.

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Mean Absolute Error

5.11 The mean absolute error shall not be more than 0.25% of the square of the absolute tolerance level (rounded up to the next whole integer) and the predicted mean age shall be not more than +/- 0.25% of the square of the absolute tolerance level (rounded up to the next whole integer) from the mean age of the sample.

Note 1: This means that the mean absolute error being tested against a 'Challenge 25' absolute tolerance level, shall be between 0 and 2 years (as 0.25% of the square of the absolute tolerance level age of 25 is 625 x 0.25% = 1.56 rounded to 2 years).

Note 2: This test is intended to show that, on average, the age estimation technology will operate to return results that are at or relatively near to the nominal age. Greater leeway is given for the mean absolute error the higher the absolute tolerance level (challenge age) is set.

Upper Tolerance Level

5.12 No more than 1:40 results shall be higher than the upper tolerance level.

5.13 The upper tolerance level shall be the absolute tolerance level minus 0.25% of the square of the absolute tolerance level then rounded down to the next whole integer.

Note 1: This means that the upper tolerance level being tested against a 'Challenge 25' absolute tolerance level, would be 23 (as 0.25% of the square of the absolute tolerance level age of 25 is 1.56 and 25 – 1.56 = 23.44 rounded down to 23). Thus, no more than 1:40 results from the test could be over 23.

Note 2: This test is intended to show that the estimated results of the age estimation technology are not skewed towards meeting the absolute tolerance level whilst disregarding the accuracy of the other ages (making the deployment of the technology riskier).

Absolute Tolerance Level

5.14 No results shall be higher than the absolute tolerance level.

5.15 The absolute tolerance level can be taken as the next whole integer above the highest estimated result identified during the test.

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Inherent Bias

5.16 The predicted mean age for each protected characteristic shall not vary from the predicted mean of the whole sample by more than +/- 0.25 years.

Note 1: This is assessing whether there is an overall bias across the whole sample rather than the risk of a bias at an individual level.

5.17 The certification officer shall be satisfied that the distribution of results between the protected characteristics shall be broadly similar.

5.18 The protected characteristics under test shall be:

(a) Gender Male or Female
(b) Skin Tone Type I and II
(c) Skin Tone Type III and IV
(d) Skin Tone Type V and VI

Note 1: Test crew subjects with gender marked as X can be excluded from tests of inherent bias.

Note 2: The Fitzpatrick Skin Tone analysis can be grouped.

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Annex 1 – Sample Size Calculation (Normative)

A1.1 The primary aim of the testing procedure is to ensure that the Age Estimation Technology does not assess a real-life person aged near to the nominal age as being over the challenge age. This would be deemed as a failure of the technology.

A1.2 Since it is not possible to test that the technology has a 0% failure rate using a sampling approach, we determine an appropriate risk-based sample size using the Bayes Success-Run Theorem.

A1.3 By using the Bayes Success-Run Theorem to calculate a sample size, it is possible to make a confidence statement about the rate at which the Age Estimation Technology will meet the critical test, conditional on there being no failures in the samples presented. This rate represents the reliability of the technology; it is the proportion of times that the technology will perform satisfactorily when used correctly (i.e., not assess a person aged between 16 and 19 years as being over the challenge age).

A1.4 For example, if both the confidence is set at 95% and reliability 99% and the appropriate sample is found to be failure free, it is estimated with 95% confidence that the technology will function satisfactorily 99% of the time. We can also interpret this in terms of a failure rate; a reliability of 99% means that the failure rate of the technology is estimated to be between 0 and 1% with 95% confidence.

A1.5 The formula for the sample size calculation is as follows:

$$N = \ln(1-C)/\ln(R)$$

where C represents the confidence level, R the reliability and ln the natural logarithm. In the table below, we present the sample sizes required for a range of reliability levels.

Confidence (C)	Reliability (R)	Failure Rate	Sample Size (N)
95%	99%	0 – 1% (1 in 100)	299
	99.9%	0 – 0.1% (1 in 1,000)	2,995
	99.99%	0 – 0.01% (1 in 10,000)	29,956
	99.999%	0 – 0.001% (1 in 100,000)	299,572
	99.9999%	0 – 0.0001% (1 in 1,000,000)	2,995,732

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A1.6 The table above demonstrates that as the reliability increases towards 100%, the sample size becomes very large. In order to be able to demonstrate the exercise of reasonable precautions and due diligence, a reliability of 99.9% is considered a suitable level which balances an acceptable maximum failure rate with the practicalities of implementing the sample size.

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Annex 2 – Table of Tolerance Levels (Informative)

Challenge Age Category	MAE Tolerance Level (MAET)	Upper Tolerance Level (UTL)	Absolute Tolerance Level (ATL)
21	1	20	21
22	1	21	22
23	1	22	23
24	1	23	24
25	2	23	25
26	2	24	26
27	2	25	27
28	2	26	28
29	2	27	29
30	2	28	30
31	2	29	31
32	3	29	32
33	3	30	33
34	3	31	34
35	3	32	35
36	3	33	36
37	3	34	37
38	4	34	38
39	4	35	39
40	4	36	40
41	4	37	41
42	4	38	42
43	5	38	43
44	5	39	44
45	5	40	45
46	5	41	46
47	6	41	47
48	6	42	48
49	6	43	49
50	6	44	50

The MAET = (ATL^2 x 0.25%) then rounded up to nearest integer
The UTL = ATL - (ATL^2 x 0.25%) then rounded down to the nearest integer
The ATL = the highest returned age estimation rounded up to the nearest integer

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Annex 3 – Example Test Results (Informative)

Tolerance Levels (Examples)

A2.1 Some illustrative examples are given to show the type of test results that do and do not pass the different criteria. Each example shows two distributions: the red curve represents the actual ages of the participants in the test (defined as the test crew), and the blue curve shows what the age estimation technology predicted the participants' ages to be. If the predictions were perfectly accurate, we would expect the two curves to overlap exactly.

The vertical lines on the plots represent the three criteria that the predicted age distribution must pass. The black lines provide a range within which the average of the predicted ages (shown by the dashed black line) must sit (check 1). The blue line represents the upper tolerance (check 2) and the red represents the absolute tolerance (check 3).

The examples below illustrate that in order to pass all three criteria, the predicted age distribution must centre around the actual age distribution and its spread (how wide the distribution is) cannot be too large.

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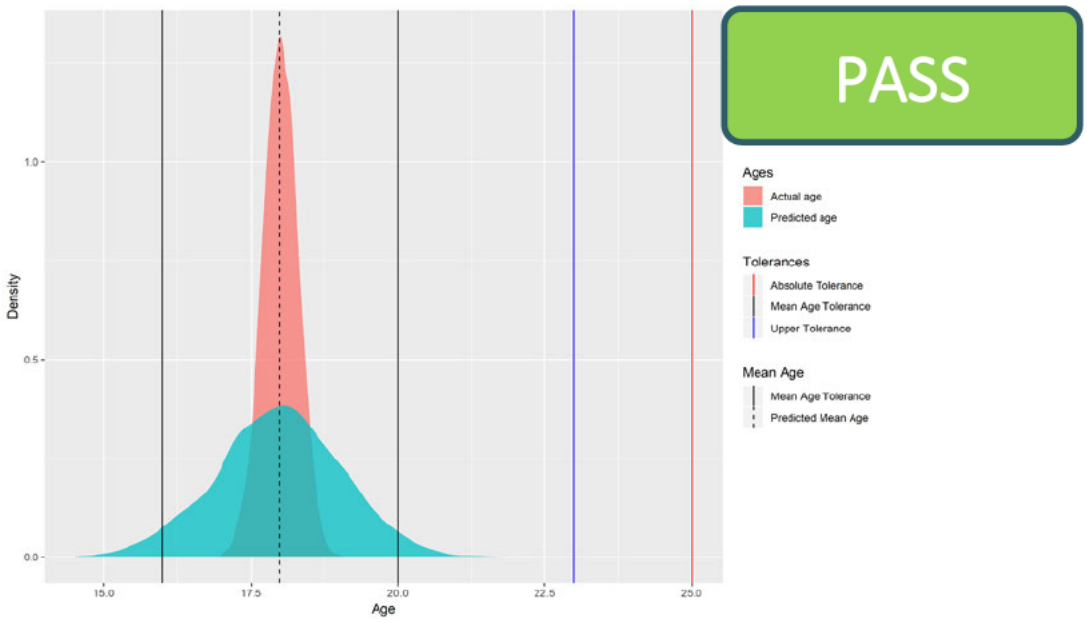
Example 1: An age estimation system tested at a nominal age of 18 against a challenge age policy of 25 – comfortably conforming



Checks of Conformity

1. Both the mean absolute error (a measure of the average difference between the actual and predicted ages) and the mean age of the predictions (dashed black line) are within acceptable tolerances. ✓

2. There are fewer than 1 in 40 (or less than 2.5% of) test crew ages that have been estimated to be greater than the upper tolerance level (blue line). In fact, this product is comfortably conforming to this check as there are no results above this tolerance (the blue curve lies below the blue line). ✓

3. There are no results (on the blue curve) above the absolute tolerance level, therefore none of the test crew were predicted to be older than 25. ✓

Subject to also meeting the inherent bias tests set out below, this age estimation system would be fit for purpose for use in a 'Challenge 25' deployment where the nominal age (i.e. the age restriction in force) was 18.

It is possible that an age estimation technology displaying the results in this graph would be sufficiently accurate to be certified at an even lower challenge age category than 25.

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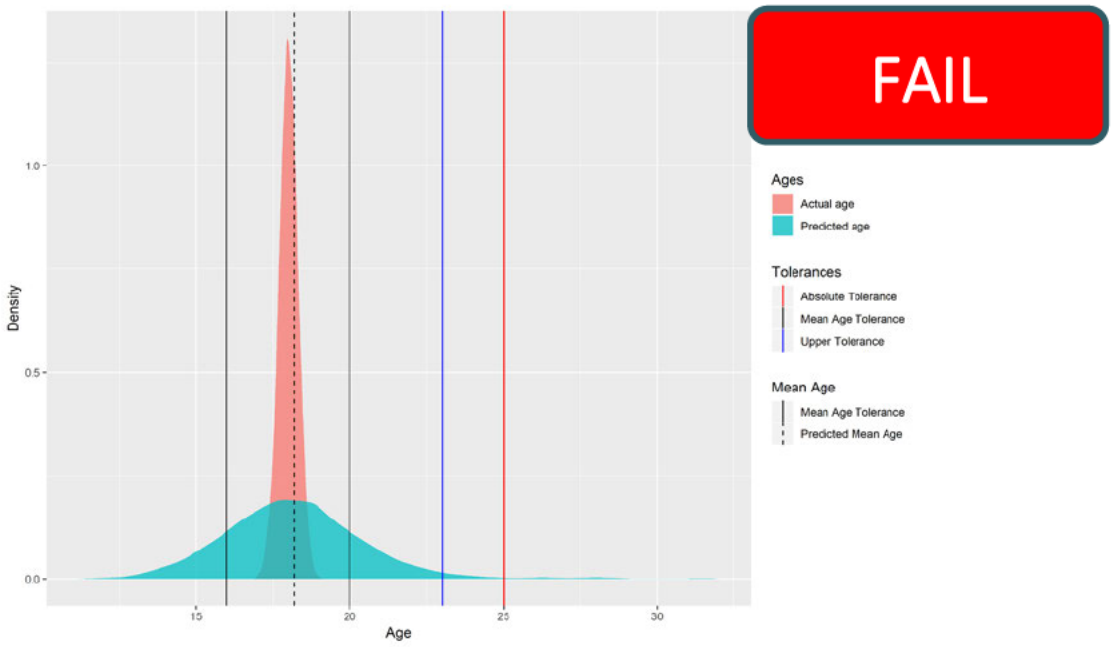
Example 2 - An age estimation system tested at a nominal age of 18 against a challenge age policy of 25 – non-conforming – too many results above the absolute tolerance level



Checks of Conformity

1. Although the range of the predicted ages (the blue curve) is broader than example 1, the mean absolute error and the predicted mean age (black dashed line) are within acceptable tolerances, so these results conform with the first check. ✓

2. There are some, but no more than 1 in 40 (or less than 2.5% of) test crew ages that have been estimated to be above the upper tolerance level (blue line), so the results also conform with the second check. ✓

3. There are results that are above the absolute tolerance level, meaning some of the test crew were estimated to be older than 25. ✗

This age estimation system would not be fit for purpose for use in a 'Challenge 25' deployment where the nominal age (i.e. the age restriction in force) was 18, as check 3 did not conform. In order to conform, we would need to see all predicted ages within the absolute tolerance boundary.

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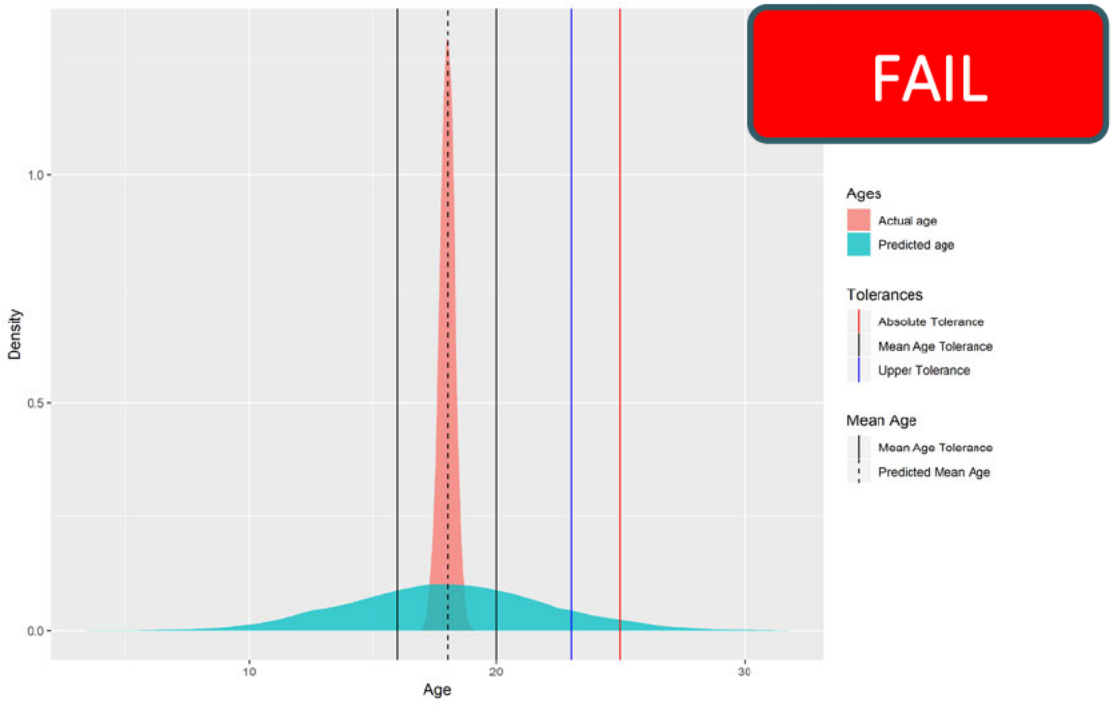
Example 3 - An age estimation system tested at a nominal age of 18 against a challenge age policy of 25 - non conforming – too many results above the upper and absolute tolerance levels



Checks of Conformity

1. Although the range of age results is much broader than the previous two examples, the predicted mean age (black dashed line) and mean absolute errors remain within the acceptable tolerances so the results conform to the first check. ✓

2. There are more than 1 in 40 results (on the blue curve) above the upper tolerance level (blue line), meaning that over 2.5% of the test crew's ages have been estimated to be over the upper tolerance level of 23. These results do not conform to the second check. ✗

3. There are results (on the blue curve) above the absolute tolerance level (red line) meaning that some of the test crew's ages have been estimated to be over 25. Therefore, there is a significant risk that this product would indicate that a citizen of 18 was older than the challenge age of 25. ✗

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This result demonstrates what this standard is testing. This product has a mean absolute error that is well within the acceptable tolerance. However, within that data, it has results that exceed both the upper tolerance level and the absolute tolerance level indicating that, if it were deployed for decisions at that challenge age, it would let people through that are at or near the nominal age. This presents an unacceptable risk of non-conformance with age restrictions legislation.

Example 4 - An age estimation system tested at a nominal age of 18 against a challenge age policy of 25 - non conforming – over-estimating the ages of the test crew

Checks of Conformity

1. The range of estimated age results (the blue curve) is much broader and older than the actual ages of the test crew (the red curve). Consequently, the mean absolute error and predicted mean age (dashed black line) are too high for the acceptable tolerances (solid black lines) and this is a non-conforming product. ✗

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2. There are more than 1 in 40 results (greater than 2.5%) of the test crew ages that have been estimated to be greater than the upper tolerance level (blue line), indicating that the spread or range of the results is also too high to be a conforming product.

3. There are no results (on the blue curve) above the absolute tolerance level (red line), meaning that the third check is passed. However, the failure of the other checks would mean that this product would fail overall.

This result demonstrates why there are three aspects to the test. Whilst ostensibly, this product is demonstrating that all of the test subjects at the nominal age are being assessed as under the challenge age (in this case, 25), on average the age estimation technology is significantly over estimating the age, making the deployment too risky. In addition, there are too many results above the upper tolerance level, meaning that the likelihood of a result above the challenge age was increased.

Inherent Bias (Examples)

A2.2 The assessment of inherent bias is based on the following:

(a) Classification or outcome error parity: the model is fair if protected groups receive an equal proportion of positive outcomes, or an equal proportion of errors.
(b) Calibration: the model is well-calibrated if the predicted ages reflect the actual ages in real life. Equal calibration definitions of fairness say that a model should be equally calibrated between protected attribute groups.

A2.3 If none of the samples have been estimated to be equal to or above the absolute tolerance level, then it is fair to say that the samples exhibit an equal proportion of errors (or outcome error parity) across the protected characteristics. However, it is important to note that our confidence in the error rate will vary across the protected characteristics as the sample size for each individually varies.

A2.4 To investigate how well the model is calibrated, the average predicted age for a protected characteristic is compared with the average predicted age of the whole sample.

Illustrative examples are provided below where the red curve represents the distribution of the predicted ages for the whole sample and the blue curve represents the distribution of the predicted ages for all the females in the sample. The dashed black lines represent the interval in which the average age of the females should lie in order to conform (within +/- 0.25 years of the mean predicted age of the whole sample).

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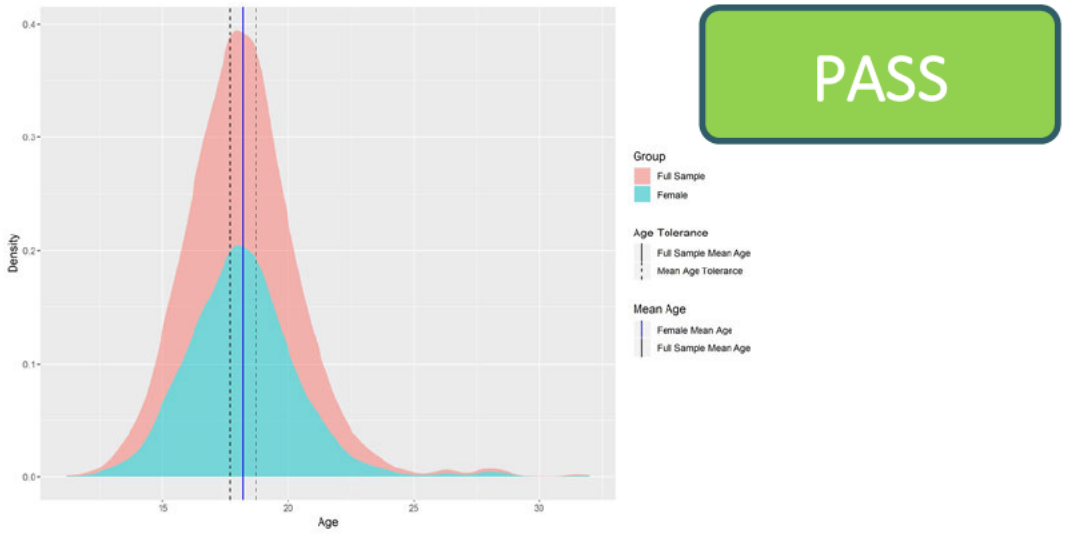
Example 5 - An age estimation system tested for gender bias - conforming – the mean results of both genders are broadly aligned and within acceptable tolerances



Checks of Conformity

1. The results for female predicted ages (the blue curve) are broadly similar to the results for the predicted ages across the whole sample (the blue curve) and the average age of the female samples does not differ by +/-0.25 years from the average of the whole sample. ✓

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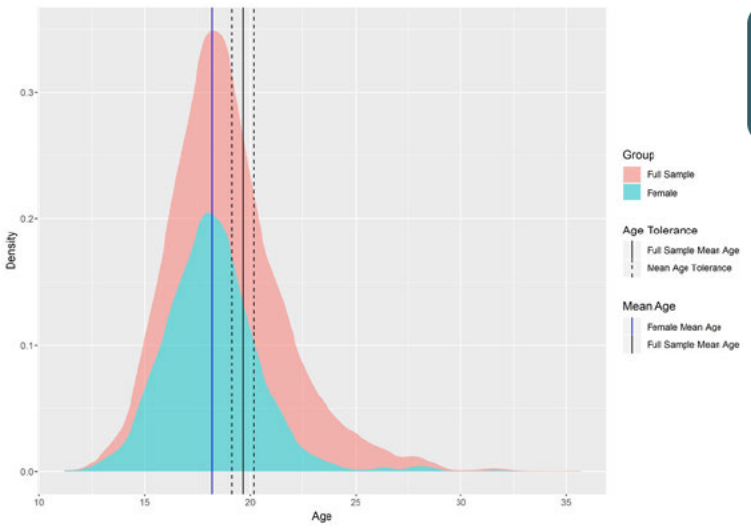
Example 6 - An age estimation system tested for gender bias – non conforming – the average age of the female samples is lower compared to the whole sample indicating an inherent bias



FAIL

Checks of Conformity

1. The average predicted age of the female samples (the blue line) is more than 0.25 years less than the average predicted age of the whole sample (it lies below the dashed lines), indicating an inherent bias. ✗

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About ACCS

The Age Check Certification Scheme is an independent not-for-profit certification scheme for providers of age restricted goods, content or services. We check that age systems work. Our scheme, backed by the Northern Powerhouse Investment Fund, can be utilised to provide full conformity assessment in accordance with all aspects of age restricted sales. We offer a range of services, including Test Purchasing, which deploys our award-winning Android & iOS App, and boast a state-of-the-art Age Check Test Studio which enables the scientific examination of age check systems.

Internationally recognised Standards

Our scheme provides evidence that your age check practices meet international standards.

Highly qualified certification officers

Our locally sourced certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check Certification Scheme

www.accscheme.com

An independent not-for-profit company registered in England and Wales (11493870) at Unit 321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL

eSafety FOI 25143
Document 4 of 75

Age Check Certification Scheme

Standards and Technical Requirements

ACCS 2:2021

Technical Requirements for Data Protection and Privacy

The certification criteria contained within this document have been approved by the Information Commissioner's Office in accordance with the Commissioner's tasks and powers under Articles 57(1)(n) and 58(3)(f) pursuant to Article 42(5) of the UK General Data Protection Regulation.

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ACCS 2:2021

Technical Requirements for Data Protection and Privacy

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Introduction

The Age Check Certification Scheme tests that age check systems work. There are a wide range of businesses that have to take steps to gain assurance about the age of their customers, particularly if they are selling age restricted goods, content or services or information society services providing age appropriate design. These businesses tend to use service providers such as Proof-of-Age ID Providers, Age Check Providers, Age Exchange Service Providers, Electronic ID Validation Services and Analytical and Profiling Services.

These technical requirements have been developed in response to public concern, campaigns and industry needs highlighted about the handling, privacy and security of personal data when going through an age assurance process or designing age appropriate services.

The Scheme is operated through our UKAS accredited conformity assessment body (Age Check Certification Services Ltd) and the certification criteria contained within this document have been approved by the Information Commissioner's Office in accordance with the Commissioner's tasks and powers under Articles 57(1)(n) and 58(3)(f) pursuant to Article 42(5) of the UK GDPR.

Data protection and privacy is critical to the successful operation of age check data processing services and when designing age appropriate services. These technical requirements form an essential (and mandatory) part of the assessment of the efficacy and accuracy of clients' age check processes or age appropriate design. So these technical requirements stand alongside the International and National Standards, local Standards and other technical requirements operated by the Scheme. These are all listed in Section 2 of this document (Normative References).

This document defines the technical, organisational and documentary requirements, including data protection enhancement techniques, specifically for providers of age check services or providers of age restricted goods, services or content, or design of information society services likely to be accessed by children and related to privacy, handling of personal data and the obligations arising from UK GDPR.

In addition, children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguarding concerns and their rights in relation to the processing of personal data. Any information given to, or provided in communication with, a child shall be in "such a clear and plain language that the child can easily understand". Where a child asks a business to provide a service for which payment is normally made, parental consent shall be required unless the child is aged 16 years or over. These technical requirements recognise that organisations carrying out age assessments have particular responsibilities when handling data that they identify as being the personal data of a child.

Any certification against the Age Check Certification Scheme does not reduce the responsibility of the data controller or the data processor to comply with UK GDPR and is without prejudice to the tasks and powers of the Information Commissioner's Office.

These technical requirements are applicable to any organisation described in Section 1 (Scope), regardless of size, type and nature, and applies to its activities, products and services involving personal data processing, that the organisation can control or influence considering a life cycle of the data processing.

The Age Check Certification Scheme Rules and Procedures also set out the requirements for Scheme Clients and commitments to Age Verification and Design Best Practice. This document then sets out the rules that are applicable to all clients, and those applicable to clients applying for all types of age checking services, to relying parties in connection with their data processing activities or to information society services in relation to the age appropriate design of their services.

The Age Check Certification Scheme Rules and these Technical Requirements have been designed to comply with ISO/IEC 17065:2012, the UK Information Commissioner's additional accreditation requirements for certification bodies, the relevant regulatory requirements for age verification service providers, the provisions of UK GDPR, the appropriate product and service standards and the requirements of the Trade Mark Rules 2008.

PLEASE NOTE: Scheme Clients cannot apply for UK GDPR certification on its own through this scheme, they must be applying for certification against the technical requirements directly relevant to their business activities (such as 'Age Estimation Technologies' as an example). Assessment against these technical requirements for data protection and privacy is automatically included in order to gain UK GDPR certification.

1. Scope

1.1 The suite of Age Check Certification Scheme (ACCS) Technical Requirements (described in Section 2 – Normative References) are applicable to Scheme Clients submitting their products, processes or services for certification from ACCS. These technical requirements specifically cover the processing of personal data within those products, processes or services as the object of the UK GDPR certification. Scheme clients that can demonstrate compliance with the technical requirements and gain certification are entitled to use the scheme logo (mark of conformity) on their promotional material.

PLEASE NOTE: The Scope of the Scheme Criteria and Target of Evaluation for Age Appropriate Design of Information Society Services is set out in Section 1 of ACCS 3. Those technical requirements apply certain aspects of this document to avoid unnecessary duplication. The Scope of Scheme Criteria in this document focusses on Age Check Services.

Scope of Scheme Criteria for Age Check Services

1.2 These technical requirements set out the specific data processing requirements for activities concerned with the processing of personal data when undertaking age check practices, covering the relevant phases of processing and the whole life-cycle of data including:

a) Age check policies – including deletion and/or anonymisation;
b) Data Creation, Data storage, data usage, data archival and data destruction;
c) Data privacy, protection and security;
d) Technical organisational measures, including information security management, vulnerability scanning and penetration testing;
e) Data subject rights, including access to privacy policies, access to information, rights to rectification, erasure, restricting processing, data portability and rights to object;
f) Automated decision-making and profiling of personal data;
g) The roles of Data Protection Officers and preparation of Data Protection Impact Assessments;
h) Sub-contracting of processing activities, including the use of age attribute exchanges and contract specifications;
i) Age attributes, including checking processes for age attributes, scoring and assessment.

1.3 Any Scheme Client that applies for certification under one of the standards or technical requirements applicable to their activities (as set out in Section 2 – Normative Requirements) shall be assessed for their data processing in accordance with these technical requirements.

Types of Age Check Services in Scope

1.4 The scope of these technical requirements covers any of the following types of organisation acting as a data controller or joint data controller, that provide at least one of the services in this section 1.4 undertaking any of the processing activities in section 1.6 but excluding any processing activities in section 1.7, that is any:

a) Proof-of-Age ID Providers that verify age attributes and issue a reusable physical ID card, token or app that an unknown third party (such as a retailer) can rely on with or without a pre-arranged contractual relationship with the Proof-of-Age ID Provider;
b) Age Check Providers that verify age attributes on request by a third party on a transaction-by-transaction basis under a pre-arranged contractual relationship with the Age Check Provider;
c) Age Check Exchange Providers or Brokers that provide an online gateway for Age Check Providers and Relying Parties to access user asserted, permissioned and verified attributes;
d) Relying Parties (online or offline) that rely on results of an age check (either remotely or during a face-to-face encounter) to establish the age-related eligibility of an individual for the purposes of a transaction (such as sellers or providers of age restricted goods and services).

Types of Service Provided by Age Check Services in Scope

1.5 Age Check Providers are likely to be providing at least one of the following services aimed at achieving age assurance about any individual:

a) Age determination – an indication establishing that an individual has a particular age stated to a specified level of confidence and by reference to information related to that individual;
b) Age categorisation – an indication establishing that an individual is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that individual;
c) Age estimation – an indication by estimation that an individual is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that individual.

Types of Data Processing by Age Check Services in Scope

1.6 To be eligible for certification against the requirements of this Scheme, Clients shall be undertaking one or more of the following data processing activities:

a) Age Attributes - gathering of claimed age attributes and verification of these against a reliable source of authentication;
b) Biometric Attributes - processing of biometric or inherent features and analysis of these against a trained data set to make age estimation calculations and which may allow or confirm the unique identification of that natural person, such as facial images or fingerprint data for user enrolment and authentication;
c) Personal Identifiable Information – gathering of data from personal identity documents and data sources with a view to extracting age attributes and triangulation of data;
d) Customer Records - keeping of customer account records to enable future age verification activities;
e) Authentication Tokens - the provision of data packets that provide a user with ongoing authentication records (such as cookies);
f) Special Category Data – including processing of personal data relating to gender, race and disability only insofar as it relates to the determination of whether generic algorithms incorporate inherent bias in age estimation or determination;

Note 1: The types of processing in scope do not cover all types of special category data as defined by UK GDPR.

g) Profiling - including automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to behaviours of a natural person;
h) Pseudonymisation - processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information;
i) Consent, including 3rd party parental or guardianship consent – including any processing of data indicating agreement to the processing of personal data relating to him or her or their child or a child that they exercise parental responsibility for;
j) Cross-Border Data Processing - where targets of evaluation utilise data resources from outside of the United Kingdom.

Processing by Age Check Services Not In Scope

1.7 The Age Check Certification Scheme does not include assessment of processing activities that are not considered to be relevant to the processing activities of Age Check Services such as:

a) the processing of physical or mental health, wellbeing or patient personal data (except insofar as covered by the scope of s.1.6 (f));
b) the processing of criminal records or criminal activity;
c) the processing of political opinions, religious or philosophical beliefs;
d) the processing of data revealing trade union membership;
e) the processing of genetic data – in particular unique information about a natural person's inherited or acquired genetic characteristics;

f) the processing of natural person's sex life or sexual orientation – in particular the scheme prohibits processing of personal data or augmentation of personal data with other data that may reveal a natural person's sex life or sexual orientation (such as online browsing habits);
g) the processing of natural person's data for profiling of performance at work, economic situation, health, personal preferences, interests, reliability, location or movements;
h) the processing of data for the purposes of direct marketing;
i) the processing of data purely as a data processor.

Note 1: In order to be regarded as purely a data processor all of the following statements shall be true:

a) They follow instructions from someone else regarding the processing of personal data and make none of their own decisions in that respect;
b) They are given the personal data by their customer or a similar third party or are told by that customer or similar third party what data to collect;
c) They do not decide themselves to collect personal data from individuals;
d) They do not make any decisions themselves about the lawful basis of use of that data;
e) They do not decide what purpose or purposes that the data will be used for;
f) They do not decide whether to disclose the data, or to whom;
g) They do not decide how long to retain the data;
h) The decisions about how the data is processed are prescribed in a contract with someone else and the decisions made about data processing by the Scheme Client are merely related to the implementation of that contract;
i) They have no interest in the end result of the data processing.

Note 2: Whilst it is not impossible that an age check provider is acting purely as a data processor on behalf of its clients, it is unlikely to be true in all circumstances. As such, it is important for organisations that regard themselves as being merely data processors to have clear written contracts and policies about entering into such contracts that maintain their status as data processors.

Target of Evaluation for Age Check Services

1.8 The Target of Evaluation is all processing of personal data by the Scheme Client's age assurance process relating to the gathering of the initial claim of age attribute through to the determination, categorisation and estimation of the authenticity of the claimed age attribute. The Target of Evaluation may also cover the future processing of an individual age attribute or personal identifiable information for the purpose of reverification or customer relationship management.

1.9 The Target of Evaluation shall define the targeted processing operation in terms of data types, systems and processes used. This needs to define where the processing subject to evaluation starts and ends, including any interfaces and interdependent processing

operations, including any processing on shared or externally hosted systems or by data processors acting on behalf of the Scheme Client. It shall also identify all relevant processing operations including an illustration of data flows, the area of application and reflect any special types of processing (e.g. automated decision making, profiling, high risk processing).

1.10 The Target of Evaluation shall define any interfaces or interdependent processing that is outside of the scope of the Scheme which shall be excluded from the Target of Evaluation. The Scheme Client shall provide an explanation for justifying any inclusion or exclusion of aspects of their data processing from the scope of certification.

1.11 An accurate specification of the Target of Evaluation is of fundamental importance for the certification procedure as it decides on what is covered by the certification. The Target of Evaluation shall be described on the Certification Documentation.

1.12 The Target of Evaluation shall include the identification of any processing of special category data (such as inherent or biometric features). Section 5.9 sets out specific requirements in relation to the handling of special category data.

1.13 The relevant scope set out above shall be determined for each age check system or process submitted for evaluation as a part of the application review process.

Note 1: The Target of Evaluation for Information Society Services submitted applications under ACCS 3 – Technical Requirements for Age Appropriate Design is set out in ss 1.12 – 1.15 of ACCS 3.

Territorial Scope for Age Check Services

1.14 The UK GDPR Certification scheme is applicable to where:

a) the data processing activities are conducted by organisations (controller or processor) established in the United Kingdom; or
b) the data processing activities relate to the offering of goods or services (even if for free) to data subjects situated in the United Kingdom (not restricted to those individuals).

Note 1: Monitoring of behaviour of data subjects in the UK is out of scope for this scheme.

1.15 Scheme Clients that are non-UK organisations shall appoint a UK representative, with a mandate of authority to act on behalf of the Scheme Client in the UK. The UK representative may be a an individual, or a company or organisation established in the UK, and shall be able to represent the Scheme Client regarding your obligations under the UK GDPR (e.g. a law firm, consultancy or private company).

2. Normative References

Age Check Certification Scheme

The Age Check Certification Scheme is built on a modular approach to applicable standards and technical requirements. As a part of the Application Review Process, a Certification Officer assesses the applicable requirements for the business model of the Scheme Client. The suite of applicable requirements is constantly changing as new methodologies emerge, new standards are developed and new technical requirements are introduced. A full comprehensive current list can be found on the Standards Section of the Scheme website, but include:

ACCS 0: 2021 – General Scheme Rules (covering the process of certification under ISO 17065:2012);

ACCS 1: 2020 – Technical Requirements for Age Estimation Technologies;

ACCS 2: 2021 – Technical Requirements for Data Protection and Privacy*;

ACCS 3: 2021 – Technical Requirements for Age Appropriate Design for Information Society Services*;

ACCS 4: 2020 – Technical Requirements for Age Check Providers

ACCS 5: 2021 – Technical Requirements for Age Check System Penetration Testing and Vulnerability Scans; (In Development)

ACCS 6: 2021 – Technical Requirements for Parental Consent or Social Proofing for Age Gateway Technologies. (In Development)

** ACCS 2:2021 and ACCS 3:2021 are technical requirements that have been approved by the Information Commissioner's Office in accordance with the Commissioner's tasks and powers under Articles 57(1)(n) and 58(3)(f) pursuant to Article 42(5) of the UK GDPR.*

Legal Provisions

The process of gaining age assurance is governed by numerous statutes and legal provisions relating to the control of access to age restricted goods, content and services. In addition to these, there are specific legal provisions relevant to the operation of the technical requirements in this document:

Borders, Citizenship and Immigration Act 2009

Data Protection Act 2018

Electronic Identification, Authentication and Trust Services Regulation (EU) 2014/910

General Data Protection Regulation (EU) 2016/679 as it applies in the United Kingdom by the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 as amended.

Modern Slavery Act 2015

National and International Standards

BS ISO/IEC 7810:2019 – Identification cards – Physical characteristics;

ISO 17065:2012 – Conformity assessment – Requirements for bodies certifying products, processes and services;

ISO/IEC 19794-5:2011 + A2:2015 – Information technology – Biometric data interchange formats — Part 5: Face image data;

ISO/IEC 19795-1:2006 – Information technology – Biometric performance testing and reporting – Part 1: Principles and framework;

ISO 27001:2013 – Information technology -- Security techniques – Information security management systems – Requirements;

ISO/IEC 29100:2011 – Information technology – Security techniques – Privacy;

ISO/IEC 29101:2013 – Information technology – Security techniques – Privacy architecture framework;

ISO/IEC 29109-5:2019 – Information technology – Conformance testing methodology for biometric data interchange formats defined in ISO/IEC 19794 Part 5: Face image data;

ISO/IEC 29115:2013 – Information technology – Security techniques – Entity authentication assurance framework;

ISO/IEC 30107-1:2016 – Information technology – Biometric presentation attack detection;

ISO 9001:2015 – Quality management systems – Requirements;

PAS 1296:2018 – Code of Practice for Age Check Services;

PASS 0:2020 – Proof of Age Standards Scheme – General Requirements and Definitions;

PASS 1:2020 – Proof of Age Standards Scheme – Requirements for Identity and Age Verification;

PASS 2:2020 – Proof of Age Standards Scheme – Requirements for e-ID Validation Technology;

PASS 3:2020 – Proof of Age Standards Scheme – Requirements for Data Protection and Privacy;

PASS 4:2020 – Proof of Age Standards Scheme – Requirements for Proof of Age Card Design and Construction.

Other Documents

Scheme Clients will find a substantial amount of supporting materials, guidance, advice and templates to assist with preparing and implementing their data protection systems. This section provides a list of some of the relevant materials that have been used in the preparation of this scheme or may be useful to Scheme Clients.

EDPB – Guidelines 1/2018 on certification and identifying certification criteria in accordance with Articles 42 and 43 of the Regulation 2016/679;

EA 1/22 A:2016 – EA Procedure and Criteria For the Evaluation of Conformity Assessment Schemes by EA Accreditation Body Member;

Accountability Framework, published by the UK Information Commissioner's Office;

UK Additional Accreditation Requirements for Certification Bodies;

Guidance Notes, including checklists produced and published by the UK Information Commissioner's Office;

WP29 – Guidelines on the application and setting of administrative fines for the purposes of the Regulation 2016/679;

WP29 – Guidelines on Automated individual decision-making and Profiling for the purposes of Regulation 2016/679;

WP29 – Guidelines on Personal data breach notification under Regulation 2016/679;

WP29 – Guidelines on Data Protection Impact Assessment (DPIA) and determining whether processing is "likely to result in a high risk" for the purposes of Regulation 2016/679;

WP29 – Guidelines on Data Protection Officers ('DPOs');

WP29 – Guidelines for identifying a controller or processor's lead supervisory authority;

WP29 – Guidelines on the right to data portability;

WP29 – Guidelines on consent under Regulation 2016/679;

WP29 – Guidelines on transparency under Regulation 2016/679;

WP29 – Opinion 02/2012 on facial recognition in online and mobile services (WP 192);

United Kingdom's Data Ethics Framework (updated 30th August 2018).

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3. Terms and definitions

In this document:

"shall" indicates a requirement

"should" indicates a recommendation

"may" indicates a permission

"can" indicates a possibility or a capability

GUIDANCE NOTES *are shown in italic text and are intended to assist the reader with understanding provisions.*

When referring to the ACCS Standards, refer to the ACCS Standard, followed by the year of issue, followed by the provision – such as **ACCS 0:2020, 4.3.**

3.1 **Age Appropriate Design Code (AADC)**	Means the Code of Practice laid before Parliament and issued under s.123 of the Data Protection Act 2018.
3.2 **Age Assurance**	Means the process of gaining a reliable indication of the age of an individual to an appropriate level of confidence.
3.3 **Age Attribute**	Means a piece of information about the age of a natural person.
3.4 **Age Attribute Exchange**	Means an online internet gateway for age check providers and relying parties to assess user asserted, permissioned and verified attributes *[PAS 1296:2018 – 2.1.2].*
3.5 **Age Categorisation**	Means an indication established that an individual is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that individual.

3.6 **Age Check Practice Statement**	Means the document describing the operational practices and procedures of an age check service *[PAS 1296:2018 – 2.1.1]*.
3.7 **Age Check Provider**	Means an organisation responsible for all the processes with establishing and maintaining a subject's identity attributes *[PAS 1296:2018 – 2.1.2]*.
3.8 **Age Check Service**	Means the entity that makes available attributes for the purposes of age checking *[PAS 1296:2018 – 2.1.5]*.
3.9 **Age Determination**	Means an indication established that an individual has a particular age stated to a specified level of confidence and by reference to information related to that individual *[PAS 1296:2018 – 2.1.4]*.
3.10 **Age Estimation**	Means an indication by estimation that an individual is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that individual.
3.11 **Age Verification Process**	Means the inter-related or interacting activities that transforms a series of attributes into an age verification product *[ISO 17065:2012 – 3.5]*.
3.12 **Age Verification Product**	Means the result of an age verification process *[ISO 17065:2012 – 3.4]*.
3.13 **Certification Requirement**	Means a specified requirement that is fulfilled by the client as a condition of establishing and maintaining certification *[ISO 17065:2012 – 3.7]*.
3.14 **Certification Scheme**	Means the Age Check Certification Scheme *[ISO 17065:2012 – 3.9]*.
3.15 **Client**	An organisation that has applied to the Scheme Conformity Assessment Body, Age Check Certification Services Ltd, for certification or been granted certification that is responsible to

	ACCS for ensuring that the certification requirements are fulfilled *[ISO 17065:2012 – 3.1]*.
3.16 **Consent of the data subject**	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
3.17 **Contra-indicator**	Pieces of information that either contradict statements about a claimed age attribute or claimed identity or raise some doubt over whether the claims are legitimate or genuine.
3.18 **Controller**	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing of personal data.
3.19 **CREST Certified Penetration Tester**	Means a person certified by CREST (International) Ltd to approve vulnerability scan and penetration testing standards.
3.20 **Data Ethics Framework**	Means the framework published by the UK Government on 30th August 2018 as updated from time-to-time.
3.21 **Data processing**	Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. *[UK GDPR Art. 4]*
3.22 **Data protection by design and default**	Means the appropriate technical and organisational measures as required by Article 25 of UK GDPR.
3.23 **Data Sharing Code**	Means the Code of Practice laid before Parliament and issued under s.121 of the Data Protection Act 2018.
3.24 **Evaluation**	Means the combination of the selection and determination functions of conformity assessment activities against the scheme rules *[ISO 17065:2012 – 3.3]*.

3.25 **High risk processing**	High risk processing can include the processing of: • special category data; • personal data of vulnerable natural persons, in particular of children; • personal aspects evaluated, in particular analysing or predicting aspects concerning performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements, in order to create or use personal profiles; • processing involving a large amount of personal data and affecting many data subjects.
3.26 **ICO**	Information Commissioner's Office.
3.27 **Impartiality**	Means the presence of objectivity *[ISO 17065:2012 – 3.13]*.
3.28 **Large organisation**	Organisation with more than 250 employees.
3.29 **PASS**	Means the Proof of Age Standards Scheme operated by the PASSCO Community Interest Company of 37 Stoney Street, Nottingham, England, NG1 1LS
3.30 **Personal data**	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
3.31 **Personal data breach**	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
3.32 **Privacy**	Means giving an individual the means to control how their data is used and who has access to it, for example having appropriate security measures to prevent inappropriate disclosure or giving individuals control over who their data is shared with.

3.33 **Processor**	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
3.34 **Recipient**	A natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with UK law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
3.35 **Relying Party**	Means an organisation relying on results of an online age check to establish the age-related eligibility of an individual for the purpose of a transaction *[PAS 1296:2018 – 2.1.21]*.
3.36 **Scheme Owner**	Means the Age Check Certification Scheme Ltd *[ISO 17065:2012 – 3.11]*.
3.37 **Scope of Certification**	Means the identification of the age check functions for which certification is granted, the applicable scheme and the standard, code or regulations (including their date of publication) to which it is judged that the age check function complies *[ISO 17065:2012 – 3.10]*.
3.38 **Small organisation**	Organisation that has less than 250 employees.
3.39 **Special category data**	Any personal information related to the individual's: • racial or ethnic origin; • political opinions; • religion or philosophical beliefs; • trade union membership; • genetic data; • health; • biometric data for the purpose of a unique identification or authentication of a natural person; • sexual life; • criminal convictions and offences or related security measures.

3.40 **Top management**	Person or group of people who directs and controls an organisation at the highest level.
3.41 **UKAS**	United Kingdom Accreditation Service.
3.42 **UK GDPR**	General Data Protection Regulation (EU) 2016/679, as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and section 205(4) of the Data Protection Act 2018.

4. Data Protection Management Systems

4.1 Leadership and Oversight of Data Protection Responsibilities

4.1.1 **Section 4 of these technical requirements set out how top management of the Scheme Client are responsible for ensuring that appropriate technical and organisational measures are actioned and authorised to ensure and demonstrate that the processing of personal data complies with the principles relating to processing of personal data through effective leadership and oversight.**

Note 1: The measures taken by top management should:

- *a) be linked to the scope, context, nature and purposes of the data processing;*
- *b) be adapted to the risks of likelihood and severity for the rights and freedoms of natural persons (see section 4.4);*
- *c) be applied to all processing activities within the scope of these technical requirements throughout the lifecycle of the Age Check products, processes or services, starting from ensuring privacy by design and default in the development of products, processes and services involving personal data processing (see section 5.1);*
- *d) ensure that only information that is necessary for the purposes of the processing are processed and are only accessed by designated personnel;*
- *e) be consistent with the Age Check Practice Statement, which shall describe the operational practices and procedures of the Age Check Service as required by PAS 1296:2018 – 2.1.1 (see section 4.2).*

4.1.2 **Top Management shall on a regular basis (as a minimum annually) consider, approve, update and record its consideration of the following matters:**

- **a) The Age Check Practice Statement (see section 4.2);**
- **b) The Data Protection Impact Assessment (see section 4.3), how the data processing necessary for their products, processes and services may affect individuals and justify any adverse impact identified;**
- **c) The Data Protection Policies (see section 4.3);**
- **d) Whether or not the appointment of a designated Data Protection Officer is required and to make such a suitable appointment if required, or if not required to appoint a person with appropriate seniority to have responsibility for data protection (see section 4.5);**
- **e) The effectiveness of communications, training and awareness of the Scheme Client's data protection controls (see section 4.7);**

f) The results of any internal or external audits, including audits carried out by the Scheme, to assess the response to identified non-conformity, areas for improvement or proposed preventative measures (see section 4.3.7 – 4.3.10);
g) Any personal data breaches and corrective actions taken (see section 4.9).

Note 1: Data Protection Officers or those exercising data protection responsibilities should not wait for formal reviews to take place before drawing the attention of top management to potential deficiencies in data protection controls or policies. The (at least) annual review is intended to provide an opportunity for top management to take a whole organisation look at the operation and effectiveness of its data protection controls and policies; not to deal with individual incidents.

4.1.3 **Top Management shall be accountable for decisions made about data protection and privacy as required by Article 5(2) of UK GDPR; shall maintain an open and honest approach to data processing and shall ensure compliance with all transparency obligations.**

Note 1: If Scheme Clients are a larger organisation (over 250 employees) they may choose to put in place a structured privacy management framework. This can help to create a culture of commitment to data protection, by embedding systematic and demonstrable compliance across the organisation. Amongst other things, the framework should include:

a) robust program controls informed by the requirements of the UK GDPR;
b) appropriate reporting structures;
c) assessment and evaluation procedures.

Note 2: If Scheme Clients are a smaller organisation they may likely benefit from a smaller scale approach to accountability as set out in Article 5(2) of UK GDPR. Amongst other things they should:

a) ensure a good level of understanding and awareness of data protection amongst their staff;
b) implement comprehensive but proportionate policies and procedures for handling personal data;
c) keep records of what they do and why.

Note 3: Controllers and processors each have their own documentation obligations. If the Scheme Client has 250 or more employees, they should document all of their processing activities. There is a limited exemption for small and medium-sized organisations. If they have fewer than 250 employees, they only need to document processing activities that:

a) are not occasional;
b) could result in a risk to the rights and freedoms of individuals;
c) involve the processing of special categories of data such as biometric identification data.

Note 4: Scheme Clients may find the Information Commissioner's Accountability Framework a useful guide for implementing appropriate requirements under this section.

4.1.4 The Top Management shall be responsible for ensuring that the Scheme Client have determined and documented the lawful basis of processing data for their Age Check process prior to commencing any processing of that data (See Section 5.2). This shall include:

a) identifying an appropriate lawful basis for the processing as set out in Article 6 of UK GDPR, prior to commencing processing that cannot subsequently be changed and connect it to the identified purpose of processing and privacy information provided to individuals when data was collected;
b) verifying that the processing is necessary for the purpose for which it was collected, and that there is no other reasonable and less-intrusive way to achieve that purpose;
c) if processing special category data, identifying the specific conditions in Article 9 of UK GDPR permitting the processing of that data, noting the requirements of Section 5.9 and the scope exclusions set out in Section 1.7 of these Technical Requirements;
d) where processing involves carrying out solely automated individual decision making with legal or similarly significant effects, identifying a specific condition in Article 22 UK GDPR permitting the processing of that data;
e) not undertaking any unlawful data processing activities.

Note 1: Scheme Clients should note that the processing of data should not result in an infringement of copyright, a breach of an enforceable contractual agreement, a breach of industry-specific legislation or regulations or a breach of the Human Rights Act 1998.

Note 2: Scheme Clients may need to take their own legal advice on other relevant legal requirements. If Scheme Clients have processed personal data unlawfully, the UK GDPR gives individuals the right to erase that data or restrict the processing of it.

Note 3: The requirement that Scheme Clients should process data in a fair way, means that they should handle personal data in ways that people would reasonably expect and not use it in ways that have unjustified adverse effects on them.

Note 4: Scheme Clients should consider more generally how their data processing affects the interests of the people concerned – as a group and individually, in order to make sure they are processing the personal data fairly. If Scheme Clients have obtained and used the information fairly in relation to most of the people it relates to, but unfairly in relation to one individual, that can amount to a breach of the requirements for fair processing of data.

4.2 Age Check Practice Statement

Note 1: The Age Check Practice Statement, as required by PAS 1296:2018, 2.1.1, describes the operational practices and procedures of the Age Check Service, which should be used to help inform the data processing policies and controls that need to be put into place.

4.2.1 The Scheme Clients that are Age Check Services shall:

a) have a publicly stated commitment to supporting measures of best practice to reduce the access children have to age-restricted goods, content and services;
b) act in a manner that is consistent with that commitment;
c) co-operate and support other parties in acting in a manner that is consistent with that commitment.

4.2.2 The Scheme Clients that are Age Check Services shall develop and adopt an Age Check Practice Statement which shall include as a minimum:

a) a commitment to continual improvement of age checking practices;
b) age bands that users are to be checked against and data sources suitable for age checking that age band;
c) any legal and regulatory age checking requirements that might apply to the relying party's service;
d) whether user anonymity is a significant factor for the relying party's users;
e) frequency of age re-checks needed;
f) the quality levels required for the accuracy of the age check, including the minimum trust capability categories of any data sources used, given the nature of the online service, its users and regulatory environment;
g) a requirement for enhanced data protection techniques, such as data minimisation, pseudonymisation, anonymisation;
h) where consent to age check personal data processing might be required and other data protection requirements;
i) any known exploits to circumvent age checks with any associated security measures needed to ensure more valid age checks;
j) any communication needed about the relying party's age checking policy for regulators, users and the general public; and
k) the need for awareness of other considerations relevant to the relying party's service and regulatory regime.

[PAS 1296:2018 – 3.1]

4.3 Data Protection Policies

4.3.1 In addition to the Age Check Practice Statement, Scheme Clients shall establish, document, implement and maintain appropriate data protection policies which state its commitment to deliver products, processes or services involving personal data processing in compliance with UK GDPR and its requirements in relation to accountability. These policies shall include a commitment:

a) to the protection of personal data, including prevention of personal data breaches;
b) to implement technical and organisational measures within the organisation to ensure compliance with UK GDPR.

4.3.2 Scheme Clients shall establish, implement, maintain and continually improve a set of policies and procedures (Data Protection Management System), which ensure correct implementation and maintenance of personal data related process(es). The data protection management system shall be appropriate to the type, range and volume of products and/or services involving personal data processing and associated risks of likelihood and severity for rights and freedoms of natural persons.

Note 1: Integrating all data protection processes and activities (including reporting mechanisms) into a Data Protection Management System enables the organisation to establish effective governance and continually improve the organisation's data protection. By creating a Data Protection Management System, data protection becomes an integral part of corporate governance.

4.3.3 The policies in the data protection management system shall contain as a minimum a description of how the Scheme Client:

a) implements safeguards to prevent fraud in relation to the misuse of personal data;
b) defines the data protection responsibilities, procedures and processing covered by the scope of the certification (which shall be agreed as part of the Target of Evaluation (see section 1.8 – 1.11);
c) ensures that all relevant components of the processing operations (data, systems, and processes) are covered by the certification (which shall be agreed as part of the Target of Evaluation (see section 1.8 – 1.11);
d) implements safeguards to ensure the integrity, operation, availability and security of data processing systems, including monitoring of evolving privacy and technology issues and updating of the system as required;
e) undertakes a data protection impact assessment;
f) implements technical and organisational measures to show that they have integrated data protection into their Age Check activities by design and by default;
g) assesses whether or not they are obligated to appoint a Data Protection Officer and if they are, to comply with the requirements of Articles 37 – 39 of UK GDPR;

h) ensure effective facilitation of data subjects rights, including policies and procedures on how to handle requests in relation to those rights;
i) implements incident management procedures and ensures that personal data breach notification duties are carried out in accordance with the requirements for personal data breach notifications;
j) are registered, as appropriate, with the relevant home state information rights regulator, such as the Information Commissioner's Office in the UK.

4.3.4 Scheme Clients shall have a procedure to manage documented information, including appropriate:

a) identification, description, review and approval;
b) distribution, access, rectification, deletion and use;
c) storage and preservation;
d) control of changes;
e) retention and disposal.

Note 1: Scheme Clients may use an ISO 9001 certified management system in order to manage their Data Protection Management System in an integrated manner, but the specific requirements for the Data Protection Management System set out in this Scheme should still be addressed in that integrated management system.

4.3.5 Scheme Clients shall maintain a record of processing activity which shall include (as a minimum):

a) the Scheme Client's name and contact details, whether it is a controller or a processor;
b) the purposes of the processing;
c) a description of the categories of individuals the data relates to and of personal data;
d) the categories of recipients of personal data;
e) details of transfers to third countries, including a record of the transfer mechanism safeguards in place;
f) retention schedules;
g) a descriptions of all processing activities carried out by any processors on behalf of the Scheme Client; and
h) a description of the technical and organisational security measures in place.

4.3.6 The record of processing activity shall contain (or include internal links to) the documents covering:

a) information required for privacy notices, such as the lawful basis for the processing and the source of the personal data;
b) records of consent;
c) controller-processor contracts;
d) the location of personal data;
e) Data Protection Impact Assessments;

f) records of personal data breaches
g) information required for processing special category data under the Data Protection Act 2018 (DPA 2018); and
h) retention and erasure policy documents.

Note 1: Scheme Clients may include information about the purposes of the processing, their lawful basis and relevant conditions for processing any special category data publicly available in their privacy notice(s).

4.3.7 Records shall be legible, maintained in good condition, retrievable and retained for a defined period with consideration given to relevant legal or customer requirements.

4.3.8 Scheme Clients shall implement a Data Retention Policy setting standard retention periods necessary and relevant to the data processing.

4.3.9 The Data Retention Policy:

a) shall not permit indefinite data retention;
b) shall remove the need to keep copies or images of originating identification documents for longer than 30 calendar days (as a maximum) unless a specific legal requirement exists to keep them for a longer period;
c) may permit for reuse of the age attribute during a future transaction within 12 calendar months;
d) may provide for the renewal of a data retention period at each future transaction;
e) may provide for de-personalisation or pseudonymisation of the data for future processing beyond the standard retention period;

4.3.10 Scheme Clients shall conduct internal audits of their data processing and the implementation of their data protection management system at least annually, covering all requirements of this Scheme to provide Top Management with information on whether:

a) it conforms to the requirements of UK GDPR;
b) it conforms to these technical requirements; and
c) it is effectively implemented and maintained.

4.3.11 The scope and frequency of the audits shall take into consideration the risks to personal data processes and activities and previous audit performance.

4.3.12 Scheme Clients shall ensure that internal audits shall be carried out by appropriately trained, competent and impartial auditors.

Note 1: Impartial, in this context, does not necessarily mean external or independent to the Scheme Client, but should encourage auditors that are not directly responsible for

the function or process under audit or have not been involved in the design or development of the process under audit.

4.3.13 Audit reports shall detail any significant deviation from requirements of these technical requirements. In particular, audit reports shall identify issues related to technology or processes which could affect UK GDPR compliance obligations.

4.4 Information Security and Risk Management

4.4.1 Scheme Clients shall establish, implement, maintain and continually improve a set of policies and procedures (Information Security Management System), which ensure the confidentiality, integrity and availability of systems and services, including the physical and cyber security of data covering the whole life cycle of the data in the context of the Age Check product, process or service.

Note 1: Scheme Clients can use an ISO 27001 certified management system in order to manage their data protection management system in an integrated manner, but the specific requirements for the information security, confidentiality, integrity and availability set out in these Technical Requirements shall still be addressed in that integrated management system.

Note 2: Scheme Clients may find it useful to refer to the ICO Guidance on Security Outcomes and Guidance issued by the National Cyber Security Centre to build their security resilience.

4.4.2 Scheme Clients shall ensure they process personal data in a manner that ensures the security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using technical or organisational measures based on an assessment of risks.

4.4.3 Scheme Clients shall undertake an analysis of the risks presented by their processing, and use this to assess the level of security they need to put in place. When deciding what measures to implement, they take account of the state of the art and costs of implementation.

4.4.4 Scheme Clients shall have in place security measures to ensure that:

a) the data can be accessed, altered, disclosed or deleted only by those that were authorised to do so (and that those people only act within the scope of the authority that was given to them);
b) the data that is held is accurate and complete in relation to why it is being processed; the data remains accessible and usable;
c) the data that is held is, where appropriate, unlinked or separated from the data subject, anonymised or pseudonymised to reduce or eliminate the utility of the data to a third party if it is accessed in a security breach.

4.4.5 Scheme Clients shall carry out an information security risk assessment as an organisational measure.

4.4.6 When considering security, Scheme clients shall ensure that the following are addressed:

a) system security – the security of the network and internal information systems, including those which process personal data (including firewalls, access control (including access records), passwords, no shared accounts/passwords, malware, patch management/software updates, USB use restricted, online security, remote working - secure VPNs, two factor authentication, records of user access);
b) data security – the security of the data that is held within the internal systems, e.g. ensuring appropriate access controls are in place and that data is held securely;
c) online security – e.g. the security of external websites and any other online service or application that are used;
d) device security – including policies on using Bring-your-own-Devices (BYOD) if this is offered;
e) physical security – including covering perimeter security (such as alarms, CCTV, quality doors/locks; access control measures);
f) visitor security (such as sign-in/supervision, ID cards, security passes); and
g) IT asset/waste disposal and physical security of physical IT assets including mobile devices.

4.4.7 Scheme Clients shall regularly review at least annually their information security policies and measures and, where necessary, improve them, by taking into account technical advancements, new system abilities and functionality, etc. The review shall be documented and approved by the Data Protection Officer or a person of suitable seniority with responsibility for data protection.

4.4.8 Scheme Clients shall be able to restore access to personal data in the event of any incidents, such as by establishing an appropriate backup process. Scheme Clients shall document their approach to back-ups, storage of back-ups, implementation and testing of plans in a business continuity plan.

4.4.9 Scheme Clients shall have the ability to intervene into the data processing operation in order to patch or check the system or the process.

4.4.10 Scheme Clients shall use encryption where appropriate, in order to assure that the data is stored and processed securely. The Scheme Client shall implement a policy to describe the use of encryption processes and organisation employees should be educated in such way in order to assure they have assessed the nature and scope of their processing activities and have implemented encryption solution(s) to protect the personal data they store and/or transmit.

Note 1: Scheme Clients should also consider the residual risks that remain, even after they have implemented their encryption solution.

Note 2: There are multiple industry-standard options for encryption, but Scheme Clients may consider using the National Institute of Standards and Technology (NIST) encryptions standards FIPS 140-3, SP 800-175B or SP 800-67.

4.4.11 Scheme Clients shall undertake Penetration Testing aimed at accessing the specific processing operations of the Age Check product, process or service.

Note 1: Penetration Testing shall be undertaken in accordance with the requirements of Section 6.2.

4.5 Data Protection Officers

4.5.1 A Data Protection Officer shall be appointed to ensure compliance of processes related to personal data protection, if:

a) the Scheme Client is a public authority or body (except for courts acting in their judicial capacity);
b) the Scheme Client's core activities require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking);
c) the Scheme Client's core activities consist of large scale processing of special category data or data relating to criminal convictions and offences.

4.5.2 The Data Protection Officer shall be designated on the basis of professional skills, experience and knowledge of data protection law and practices.

4.5.3 The Scheme Client shall ensure that the Data Protection Officer is involved in all issues related to the protection of personal data and shall allocate appropriate budget and resources to fulfil his/her tasks.

4.5.4 The Data Protection Officer shall report to top management.

4.5.5 The Scheme Client shall ensure that the Data Protection Officer can exercise his/her tasks with necessary independence and confidentiality. In case the Data Protection Officer is in charge of other tasks it shall not result in a conflict of interest.

4.5.6 The Data Protection Officer shall have due regard to the risk associated with data processing operations in performing the following tasks:

a) inform and advise the organisation and the employees who carry out personal data processing of their obligations;
b) monitor compliance of the organisation with the compliance obligations and internal policies and provisions including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits;

c) organise the conduct of periodic reviews of the set of technical and organisational measures related to personal data protection;

d) provide advice where requested with regard to the Data Protection Impact Assessment and monitor its performance;
e) co-operate with the ICO;
f) act as the contact point for the ICO on issues relating to personal data, where appropriate.

4.5.7 The organisation shall communicate the contact details of the Data Protection Officer to the ICO and other stakeholders whenever required.

Note 1: The Data Protection Officer can be an employee or a contracted person or shared across organisations. Professional skills and experience shall cover both management skills, IT/IS aspects and knowledge of the organisation's products and services.

Note 2: The Article 29 Guidelines on Data Protection Officers ('DPOs') can be used to identify and mitigate potential situation of conflict of interest.

Note 3: Organisations may also appoint data protection specialists for different aspects of their data processing operations.

4.6 Data Protection Impact Assessment (DPIA)

4.6.1 All Scheme Clients shall determine the activities, products and services involving personal data prior to processing considering the life cycle of the data.

4.6.2 Scheme Clients, with the support of any data processors, are required by law to undertake a Data Protection Impact Assessment (as described further in s.4.6.5), but in addition to that all Scheme Clients shall have carried out a Data Protection Impact Assessment for all certified processes prior to the processing commencing.

Note 1: A DPIA is a process to help Scheme Clients identify, assess and minimise the data protection risks of a project or service output. A DPIA should consider compliance risks, but also broader risks to the rights and freedoms of individuals, including the potential for any significant social or economic disadvantage.

Note 2: The DPIA can be a single document, or could be a series of assessments with clearly defined scope and applicability to different processing operations. Scheme Clients should take care to ensure that the totality of their DPIA(s) cover the whole of the Target of Evaluation for certification.

4.6.3 All Scheme Clients shall define a procedure and criteria for conducting a DPIA, including the production of a template for use by staff undertaking assessments. These criteria shall take into account the technological state of the art and the nature, scope, context and purposes of the processing resulting in a high risk to the rights and freedoms of natural persons in accordance with Article 35 of UK GDPR.

4.6.4 To assess the level of risk, Scheme Clients shall identify both the likelihood and the severity of any impact on data subjects. High risk could result from either a high probability of some harm, or a lower possibility of serious harm. Scheme Clients should bear in mind that some data subjects may be less resilient than others and may have additional needs to secure the protection of their data.

4.6.5 A DPIA shall contain as a minimum:

a) a systematic description of the processing operations and the purposes of the processing;
b) an assessment of the necessity and proportionality of the processing operations in relation to the purposes;
c) an assessment of the risks to the rights and freedoms of data subjects;
d) the risk category of personal data;
e) abnormal conditions and reasonably foreseeable situations that may lead to personal data breaches;
f) the measures to address the risks, including safeguards, security measures and mechanisms to ensure the protection of personal data and to demonstrate regulatory compliance taking into account the rights and legitimate interests of data subjects and other persons concerned;
g) any change of the risk represented by processing operations, including planned or new developments, and new or modified activities, products and services.

4.6.6 Scheme Clients shall have a specific DPIA (in addition to any DPIA required for their overall processing) for any data processing operations that may be high risk as required by Article 35(4) of UK GDPR.

Note 1: A specific DPIA may not necessarily be in a separate document, but where referring to high risk data processing operations within a generic DPIA, these should be clearly marked and delineated.

Note 2: When considering if the processing is likely to result in high risk, organisations should check against the below indicators:

- *evaluation or scoring*
- *automated decision-making with legal or similar significant effect*
- *systematic monitoring*
- *sensitive data or data of a highly personal nature*
- *data processed on a large scale*
- *matching or combining datasets*
- *data concerning vulnerable data subjects*
- *innovative use or applying new technological or organisational solutions*
- *preventing data subjects from exercising a right or using a service or contract*

4.6.7 Scheme Clients shall regularly review, develop and manage the DPIA through a multi-disciplinary approach that considers any:

a) substantial changes to the nature, scope and context of data processing;
b) marketing, commercial or business development;
c) operations, information technology and security;
d) legal and other relevant functions including views of data subjects or their representatives.

If appropriate, particular advice on the content of the DPIA from the Data Protection Officer shall be sought.

4.6.8 The Data Protection Impact Assessment shall be documented.

4.6.9 Scheme Clients shall communicate the outputs of the Data Protection Impact Assessment to the relevant levels and functions of the organisation including the data processors, as appropriate.

4.6.10 In certain circumstances set out in Article 36 of UK GDPR, Scheme Clients shall be required to consult with the Information Commissioner's Office where the DPIA for high risk data processing cannot be mitigated.

4.6.11 Data Protection Impact Assessments should be published, except to the extent that security sensitive information can be redacted.

4.7 Training and Awareness for Staff and Contractors

4.7.1 All Scheme Clients shall implement a program of training and education for all personnel. These measures shall be subject to regular review.

Note 1: Training is dependent on the operational functions of the team member or contractor. It is not necessary for all training to be provided to all staff, but any staff accessing personal data should have at least generic UK GDPR training supplemented by subject or function specific training directly relevant to their roles.

Note 2: All staff should understand basic principles of data protection including how to recognise a request to exercise data subject rights, access to our use of information or when information is being inappropriately disposed of or left unsupervised or uncontrolled.

Note 3: Regular review includes a review both of the learning needs of individual team members and of the adequacy, quality and effectiveness of the training provision itself. Reviews of learning needs should be undertaken at least annually and reviews of training provision should be undertaken at least every three years or following any significant changes in UK GDPR legislation or practice.

4.7.2 The Scheme Client shall provide training to team members or contractors prior to them being permitted unsupervised access to personal data. The training shall be refreshed periodically, which should not be less frequent than annually.

4.7.3 The Scheme Client shall provide training programmes that:

a) incorporate national and sector-specific requirements, including these technical requirements;
b) is comprehensive and includes training for all staff on key areas of data protection such as handling requests, data sharing, information security, personal data breaches and records management;
c) considers the training needs of all staff and use this information to compile the training programme;
d) assign responsibilities for managing information governance and data protection training across the organisation and has training plans or strategies in place to meet training needs within agreed time-scales;
e) have dedicated and trained resources available to deliver training to all staff;
f) regularly review the programme to ensure that it remains accurate and up to date;
g) the programme shall be approved by top management.

4.7.4 The Scheme Client shall:

a) conduct an assessment at the end of the training to test staff understanding and make sure that it is effective, which may include a minimum pass mark;
b) keep copies of the training material provided on record as well as details of who receives the training;
c) monitor training completion in line with organisational requirements at all levels of the organisation, and follow up with staff who do not complete the training;
d) ensure that staff are able to provide feedback on the training they receive.

4.7.3 The Scheme Client shall:

a) internally communicate information relevant to the data protection management system among the various levels and functions of the organisation, including changes to the management system, as appropriate;
b) ensure its communication process(es) enable(s) persons doing work under the organisation's control to contribute to continual improvement.

4.7.4 The Data Protection Policies and Age Check Practice Statement shall be available, communicated, understood and applied within the organisation including subcontractors and service suppliers if needed, as well as available to relevant interested parties, as appropriate.

Note 1: There is no requirement to publish the Age Check Practice Statement on a website, although Scheme Clients may choose to do so. It may not be appropriate to make all parts of the Age Check Practice Statement available outside the Scheme Client if it is necessary to protect the organisation from information security threats.

4.7.5 The Scheme Client shall ensure that any customer-specific policies or requirements, codes of conduct, binding corporate rules etc. are understood, implemented and clearly communicated to relevant staff and, where appropriate, suppliers and service providers.

4.8 Sub-contractors and external providers processing personal data

4.8.1 All Scheme Clients are responsible for the activities of any sub-contractors or providers where they are processing personal data for or on behalf of the Scheme Client. Scheme Clients shall have contracts in place for subcontractors involved in processing personal data.

Note 1: Contracts should demonstrate security and probity and shall in particular follow stringent diligence processes in accordance with the Technical Requirements in this document.

4.8.2 The contract shall include a requirement to comply with the relevant aspects of these Technical Requirements relating to data privacy, protection and security, which shall be clearly identified.

4.8.3 Scheme Clients shall ensure that outsourced processes are controlled or influenced in accordance with articles 26 and 28 – 32 of UK GDPR and to ensure the protection of data subject's rights. The type and extent of control or influence to be applied shall be defined taking into account the nature, scope, context and purposes of the processing resulting in a high risk to the rights and freedoms of natural persons.

In particular:

a) Scheme Clients shall only use external providers providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing shall meet the compliance obligations and ensure the protection of the data subject's rights;
b) processing by an external provider shall be governed by a contract that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the data controller;
c) Personal data shall only be processed by an external provider if this provider has been given instructions from the controller to do so, or if required to do so by UK law.
d) Records of processing activities shall be maintained by external providers, containing information such as the name and contact details of the controller, the purposes of the processing, a description of the categories of data subjects and the categories of personal data, and envisaged time limits for erasure of the different categories of data;
e) Records of all categories of processing activities shall also be kept by an external provider, including information on the categories of processing carried out on behalf of each controller;

f) External providers shall cooperate, on request, with the ICO in the performance of its tasks;
g) The controller and processor shall take steps to ensure that any external provider who has access to personal data, acting under their authority, shall not process this data unless they have been instructed to do so by the controller or UK law.

4.8.4 That contract shall stipulate, in particular, that the external provider:

a) processes the personal data only on documented instructions from the Scheme Client, including with regard to transfers of personal data to a third country or an international organisation;
b) ensures that persons authorised to process the personal data have committed themselves to confidentiality;
c) takes all specified measures related to personal data security;
d) assists the Scheme Client by appropriate technical and organisational measures adapted to the nature of processing;
e) assists the Scheme Client in ensuring compliance with the obligations pursuant to articles 32 to 36, taking into account the nature of processing;
f) at the choice of the Scheme Client, deletes or returns all the personal data to the organisation after the end of the provision of services relating to processing;
g) makes available to the Scheme Client all information necessary to demonstrate compliance with the compliance obligations and contribute to audits, including inspections, conducted by the Scheme Client or another auditor mandated by the Scheme Client, including those appointed by the Scheme;
h) shall not engage another processor and/or service provider without prior specific or general written authorisation of the Scheme Client;
i) shall notify the Scheme Client without undue delay after becoming aware of a personal data breach and any infringement of UK GDPR.

4.9 Managing Personal Data Breaches

4.9.1 All Scheme Clients shall establish, implement and maintain the process(es) needed to prepare for and respond to potential personal data breach situations.

4.9.2 The Scheme Client shall:

a) prepare to respond by planning actions to prevent or mitigate personal data breaches and their consequences, appropriately to the magnitude of breaches and their potential impact;
b) respond to actual data breach situations;
c) periodically test the planned response actions, where practicable;
d) periodically review and revise the process(es) and planned response actions, in particular after the occurrence of personal data breach situations or tests;

e) provide relevant information and training related to personal data breach preparedness and respond, as appropriate, to relevant interested parties, including persons working under its control;
f) ensure that near misses are identified and reported as good practice;
g) ensure there is a review of breaches/near misses to improve systems, training and provide opportunities for continuous improvement.

4.9.3 Any data processor shall notify the data controller without undue delay after becoming aware of a personal data breach.

4.9.4 When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, Scheme Clients shall communicate the personal data breach to the data subject without undue delay.

4.9.5 In addition, in the case of a personal data breach, Scheme Clients shall, within 72 hours, notify the ICO about the personal data breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. In addition, if the data breach is likely to affect certification under these technical requirements, then the Scheme Client shall also notify the Scheme of the circumstances of the data breach (but shall not disclose any personal data to the Scheme in doing so).

4.9.6 The communication to the data subject and/or to the ICO shall meet requirements expressed in articles 33 and 34 of UK GDPR.

4.9.7 In communications with the data subject and/or the ICO, Scheme Clients shall describe, in clear and plain language, the nature of the personal data breach and, at least:

a) the name and contact details of the Data Protection Officer (if the organisation has one) or other contact points where more information can be obtained;
b) a description of the likely consequences of the personal data breach;
c) a description of the measures taken, or proposed to be taken, to deal with the personal data breach and including the measures taken to mitigate any possible adverse effects.

4.9.8 Scheme Clients shall maintain records of any data breaches comprising the facts relating to the personal data breach, its effects and the remedial action taken. These records shall be made available to the ICO and the Scheme on request.

Note 1: Scheme Clients should ensure that they record all breaches, regardless of whether or not they need to be reported to the ICO.

Note 2: Article 33(5) of UK GDPR requires that Scheme Clients document the facts relating to the breach, its effects and the remedial action taken. This is part of their overall obligation to comply with the accountability principle, and allows the ICO to verify the organisation's compliance with its notification duties under the UK GDPR.

Note 3: As with any security incident, Scheme clients should investigate whether or not the breach was a result of human error or a system issue and see how a recurrence can

be prevented – whether this is through better processes, further training or other corrective steps.

Note 4: As part of the breach management process Scheme Clients should undertake a risk assessment and have an appropriate risk assessment matrix to help to manage breaches on a day to day basis. This helps to assess the impact of breaches and meet the reporting and recording requirements. This also provides a basis for the breach policy and helps to demonstrate the accountability as a data controller.

Note 5: As a result of a breach, Scheme Clients may experience a higher volume of data protection requests or complaints, particularly in relation to access requests and erasure. Scheme clients should have a contingency plan in place to deal with the possibility of this. It is important that Scheme Clients continue to deal with those requests and complaints, alongside any other work that has been generated as a result of the breach. Scheme Clients should also consider how to manage the impact to individuals, including explaining how they may pursue compensation should the situation warrant it.

5. Requirements for Data Processing

5.1 Data Protection by Design and Default

5.1.1 Scheme Clients shall implement service and product development processes to ensure that data protection is considered from the outset and incorporated into every stage of the service and product design by default.

5.1.2 The plans and records for service and product development and design shall:

a) provide a specific section relating to data protection considerations;
b) identify the key risks identified relating to data processing that are identified by the service and product development team;
c) provide for the input of the Data Protection Officer (see section 4.5);
d) provide for the input of learning from service and product development iterations, including from stakeholder and staff feedback;
e) be kept for a minimum of 12 months following the release of the product or service into a live environment.

5.2 Lawful Basis of Processing

5.2.1 Scheme Clients shall have a record of which lawful basis of processing they are relying on for each of their processing activities, and justification for choosing that basis. Scheme Clients shall document their lawful basis of processing in a record of processing activities, which shall be consistent with the decisions of top management as required by section 4.1.4. Scheme Clients shall be able to justify that the lawful basis of processing selected is appropriate for the purpose of the processing.

Note 1: In order to demonstrate this, Scheme Clients could include information about the lawful basis (or bases, if more than one applies) in their privacy notice. Under the transparency provisions of the UK GDPR, Scheme Clients need to give people information (see section 5.8) about:

- *their intended purposes for processing the personal data; and*
- *the lawful basis for the processing.*

Note 2: In case special categories of data are processed, Scheme Clients should document both their lawful basis for processing and their special category condition so that they can demonstrate compliance and accountability.

Fairness

5.2.2 Scheme Clients shall consider and document their consideration of how the processing may affect the individuals concerned and justify any adverse impact.

5.2.3 Scheme Clients shall not deceive or mislead individuals (collectively or individually) when they collect and process personal data. A statement made, action taken or material omission during the data collection process shall be treated as misleading if:

a) it is not true;
b) its overall presentation is in any way likely to deceive individuals even if the information is factually correct;
c) it omits or hides material information;
d) it is presented in a manner that is unclear, unintelligible, ambiguous or untimely; or
e) it results in actions or behaviours that the individual would not reasonably expect.

Note 1: The record of consideration of the fairness of data collection and processing may be included in the Data Protection Impact Assessment (see Section 4.6).

Consent

5.2.4 Where the processing is based on the legal basis of consent, the Scheme Clients shall:

a) have checked and documented that consent is the most appropriate lawful basis for processing;
b) have made the request for consent prominent and separate from their terms and conditions, provided privacy information to ensure that consent is fully informed;
c) have asked people to positively opt in;
d) have not used pre-ticked boxes or any other type of default consent;
e) have used clear, plain language that is easy to understand;
f) have specified why the data is necessary and what it shall be processed for;
g) have given separate distinct ('granular') options to consent separately to different purposes and types of processing;
h) have provided the name of their organisation and any third party controllers who shall be relying on the consent;
i) provide a means for individuals to withdraw their consent without detriment;
j) avoid making consent a precondition of a service.

5.2.5 Scheme Clients shall ensure that individuals can refuse to consent without detriment.

5.2.6 If Scheme Clients offer online services directly to children, they should only seek consent if they have age-verification measures (and parental-consent measures for younger children) in place. When relying on consent of children, Scheme Clients shall provide information (in

an age appropriate manner) to ensure that the child understands what they are consenting to, and they do not exploit any imbalance of power in the relationship between them and the children.

5.2.7 When offering online services to children on the basis of consent, Scheme Clients shall ensure that anyone who provides their own consent is at least 13 years old. When offering online services to children on the basis of consent, organisations must obtain parental consent to the processing for children who are under the age of 13, and make reasonable efforts to verify that the person providing consent holds parental responsibility for the child.

5.2.8 Scheme Clients shall keep a record of when and how they got consent from the individual and also keep a record of exactly what they were told at the time.

5.2.9 Scheme Clients shall have in place measures to regularly review consents to check that the relationship, the processing and the purposes have not changed.

Note 1: Scheme Clients should have processes in place to refresh consent at appropriate intervals, including any parental consents. They should consider using privacy dashboards or other preference-management tools as a matter of good practice.

5.2.10 Scheme Clients shall make it clear and easy for individuals to withdraw their consent at any time, and publicise how to do so and act on withdrawals of consent as soon as they can and should never penalise individuals who wish to withdraw consent.

Note 1: Consent is not required for the discharge of a legal obligation to carry out age verification, but if a person's personal data is retained after the legal obligation has been discharged (i.e. for customer accounts or re-verification) consent may be the most appropriate lawful basis and shall be obtained before continuing to process the personal data.

Contract

5.2.11 Where the processing is based on the legal basis of contract, the Scheme Clients shall:

a) identify a contract with the individual and demonstrate how they need to process their personal data to comply with their obligations under the contract;
b) identify why it is necessary for the performance of the contract to process the personal data;
c) identify circumstances where a contract is not yet executed, but the individual has asked for something as a first step (e.g. verify their age) and it is necessary to process their personal data to do what they ask. This applies even if they do not actually go on to enter into a contract (for instance because they are not old enough to access the goods, content or services), as long as the processing was in the context of a potential contract with that individual;

d) provide guidance and information to individuals that are subject to contract on how they can exercise their data rights.

Note 1: Scheme Clients could discharge the requirements under 5.2.11 (a) by:

a) maintaining a template contracts database;
b) record the personal data obligations generated by the template contracts;
c) maintain a record of contract review.

Legal Obligation

5.2.12 Where the processing is based on the legal basis of discharge of a legal obligation, the Scheme Clients shall:

a) have identified the specific legal obligation(s) and maintained a documented schedule of the obligation(s) relied upon;
b) identify why it is necessary for the discharge of the legal obligation to process the personal data; and
c) have identified different requirements (such as differing age verification laws) in different jurisdictions and recorded this in the documented schedule of the obligation(s) relied upon.

5.2.13 Scheme Clients shall have assessed the limitations of when their legal obligation has been discharged and another lawful basis of processing may be required from that point forward. As an example, the legal obligation to age verify only applies up until the point that the age verification process is completed. Processing personal data after that point would require a different lawful basis.

5.2.14 Scheme Clients shall provide guidance and information to individuals where their data is being processed in discharge of a legal obligation on how they can exercise their data rights.

Note 1: Scheme Clients should note that the legal obligation to comply with age restrictions on goods, content or services is principally placed upon the seller of those goods, content or services. However, many pieces of age restriction legislation can transfer (or more accurately duplicate) that legal obligation on to a third party upon whom the seller of the age restricted goods, content or services relies (known as the relying party) and whose act or default resulted in the commission of an offence.

Note 2: Where Scheme Clients are acting for relying parties in the discharge of their legal obligations, this should be carefully recorded in the contract with the relying party. Care should be given to understanding whether or not the Scheme Client is discharging a legal or contractual obligation as its intended lawful basis of processing the data – which may differ from service to service or product to product.

Note 3: The Scheme Client should be able to identify the obligation(s) in question, either by reference to the specific legal provision or else by pointing to an appropriate source of advice or guidance that sets it out clearly. For example, the Scheme Client can refer to a government website or to industry guidance that explains generally applicable legal obligations.

Vital Interests

5.2.15 Scheme Clients shall not rely upon the vital interests of the data subject for the processing being certified as a lawful basis of processing.

Note 1: Scheme Clients may want to consider the vital interests of data subjects when planning for the potential need to share data in an emergency (see section 5.11.5).

Public Tasks

5.2.16 The only circumstances under this Scheme whereby Scheme Clients that are Age Check Services may rely on the discharge of a public function for their data processing is when their processing is necessary for the purposes of:

a) Age assessments under s.55 of the Borders, Citizenship and Immigration Act 2009; or
b) Age assessments under s.51 of the Modern Slavery Act 2015.

5.2.17 Scheme Clients shall undertake such age assessments in accordance with the Home Office Assessing Age Code of Practice V3.0. Scheme Clients shall be able to demonstrate that they have an active role with a competent public authority in undertaking age assessments.

Legitimate Interests

5.2.18 Where the processing is based on the legal basis of legitimate interests, the Scheme Clients shall:

a) have assessed the specific and relevant legitimate interest(s) and maintained a documented schedule of the legitimate interests(s) relied upon;
b) ensure that policies regarding the responsibility to protect an individual's interests are applied, including undertaking a balancing assessment to demonstrate that the individual's interests do not override the legitimate interest(s) relied upon;
c) have verified that the processing is necessary to discharge those legitimate interest(s) and there is no less intrusive way to achieve the same result;

d) have identified different requirements (such as differing age verification laws) in different jurisdictions and recorded this in the documented schedule of the legitimate interest(s) relied upon.

5.2.19 A Legitimate Interests Assessment shall be carried out, including undertaking an assessment of:

a) The purpose test (identify the legitimate interest);
b) The necessity test (consider if the processing is necessary);
c) The balancing test (consider the individual's interests).

Note 1: In undertaking a balancing assessment, Scheme Clients may utilise the Information Commissioner's Template for Legitimate Interests Assessments.

5.2.20 Scheme Clients shall provide guidance and information to individuals (See Section 5.8 – Privacy Policy) where their data is being processed in discharge of a legitimate interest(s) on how they can exercise their data rights.

5.2.21 Scheme Clients shall not rely on legitimate interests as a lawful basis of processing where the interests of the data controller or third party are overridden by the legitimate interests and fundamental rights of the data subject, particularly where the data subject is a child.

Note 1: Scheme Clients should tell people in the privacy information that they are relying on legitimate interests, and explain what these interests are.

Note 2: If Scheme Clients want to process the personal data for a new purpose, Scheme Clients may be able to continue processing under legitimate interests as long as their new purpose is compatible with the original purpose.

Note 3: If Scheme Clients rely on legitimate interests, the right to data portability does not apply (See section 5.10.23 – 5.10.26).

5.3 Purpose Limitation

5.3.1 Scheme Clients shall have clearly identified and documented the purpose or purposes for processing data prior to processing, which shall only process data in a manner consistent with the decisions of top management on purpose.

5.3.2 The purpose or purposes for data processing shall be publicly available in the Scheme Client's privacy information for individuals.

5.3.3 Scheme Clients shall regularly review their processing and, where necessary, update their record of processing activities (See Section 4.3.5) and their privacy information for individuals (See Section 5.8). The regular reviews shall be documented.

5.3.4 If a Scheme Client plans to use personal data for a new purpose other than a legal obligation or function set out in law, they shall have a process in place to ensure that this is compatible with their original purpose or they shall get specific consent for the new purpose.

Note 1: Scheme Clients should specify the purpose or purposes for processing personal data within the documentation they are required to keep as part of the records of processing activities, as well as to specify their purposes in the privacy information for individuals.

Note 2: If the Scheme Client is a small organisation (employing fewer than 250 staff) and it is exempt from some documentation requirements, it may not need to formally document all of the purposes to comply with the purpose limitation principle.

5.4 Data Minimisation

5.4.1 Scheme Clients shall only collect and process personal data that is adequate, relevant and necessary for the purposes for which they are processed.

5.4.2 Scheme Clients shall collect sufficient personal data to properly fulfil those purposes. The data is only collected in identifiable form to the extent strictly necessary in relation to the purpose for which it is collected. This applies to the amount of personal data collected, to the extent of their data processing and the period of storage and accessibility.

5.4.3 Scheme Clients shall take action to eliminate, in particular:

a) unnecessary creation of temporary files;
b) unnecessary log in information;
c) unnecessary unfiltered data (such as data captured in ID scanning processes);
d) unnecessary data retention (see below);
e) unnecessary augmentation of data sets to show or potentially indicate user behaviours, personal preferences, interests, location or movements.

5.4.4 Scheme Clients shall periodically review the data they hold, and delete anything that is not needed.

5.4.5 Scheme Clients shall identify and document the data retention periods in a retention schedule, including justification of their retention policy by reference to the period of time that the Scheme Client needs the data for their specified purposes (see section 4.3.8 – 4.3.9).

5.4.6 Scheme Clients that use personal data for the training of or processing data using artificial intelligence or machine learning technologies shall establish and document a data minimisation policy and implement effective controls in connection with the accuracy,

handling, storage and use of training data for that purpose. This is in addition to the requirement at s.4.2.2 (g) regarding the Scheme Client's data minimisation approach in the Age Check Practice Statement.

Note 1: Scheme Clients should identify the minimum amount of personal data they need to fulfil their purpose and should hold that much information, but no more. In order to assess whether Scheme Clients are holding the right amount of personal data, they should first be clear about why they need it. Scheme Clients should periodically review the processing to check that the personal data they hold is still relevant and adequate for their purposes, and delete anything they no longer need. This is closely linked with the storage limitation principle.

Note 2: Augmentation of data can occur when two or more seemingly independent sets of data contain a common data field or can be temporally aligned. This can result in the ability to identify user behaviour, personal preferences, interests, location or movements, even if the second data set does not include personally identifiable information. As an example, a transaction code applied to a data packet or cookie on an adult entertainment site with an electronic time stamp, but containing no personally identifiable information, could be augmented with a second data set showing identity and age verification records and an electronic time stamp. The two together could be utilised to identify the user of a particular adult entertainment site (which may in turn give an indication of sexual preference or orientation) and compromise the privacy and security of that individual's personal data.

Note 3: The ICO have issued guidance on artificial intelligence and data protection.

5.5 Accuracy

5.5.1 Scheme Clients shall ensure that any personal data created by their processing is accurate and kept up to date.

5.5.2 Scheme Clients shall check the accuracy of the data they collect, and record the source of that data. There shall be a process in place to identify when they need to keep the data updated to properly fulfil their purpose, and to update it as necessary.

5.5.3 Scheme Clients shall clearly identify any matters of opinion, including artificial intelligence analysis of claimed age attributes or biometric or inherent features and, where appropriate, record who (or which version of an algorithm has reached that opinion) and any relevant changes that occur to the underlying facts. The documentation supporting the handling of outputs of artificial intelligence systems shall state that results shall not be interpreted as statements of fact, but as statistically informed guesses.

5.5.4 Scheme Clients shall ensure that any personal data identified as being inaccurate are erased or rectified without delay and notify anybody that the personal data has been shared with.

5.5.5 Scheme Clients shall have detection mechanisms in place during the authentication and identification processes to identify contra-indicators to claimed age attributes. The detection mechanism should be able to recognise that the discovery of a contra-indicator does not necessarily mean that a claim is not legitimate. The Scheme Client's process(es) should trigger mitigation actions when a contra-indicator is detected.

Note 1: The processes put in place to identify contra-indicators should not result in increased surveillance of data subjects.

Note 2: Contra-indicators are pieces of information that either contradict statements about a claimed age attribute or claimed identity or raise some doubt over whether the claims are legitimate or genuine. They may include:

a) inconsistencies between printed data on an identity document and check digits or data captured through near field communication (NFC) chips
b) multiple use of the age attribute in contradictory circumstances (such as use to prove that a holder is under a certain age, perhaps for a concessionary fare, but also over the same age, perhaps to access an age restricted cinema viewing)
c) two identification documents presented by the same person, but with differences on the face of the documents, such as name, address, gender, date of birth, etc.

5.5.6 The Scheme Client's processes should react to contra-indicators discovered after initial identification or authentication in the same manner as if they occurred during initial identification or authentication. The processes should result in an evaluation of whether an age attribute record needs to be reviewed to determine if it should cease to assert a claimed age based on the contra-indicator(s) discovered.

5.5.7 Scheme Clients shall ensure that their processing systems are designed in a manner which fosters the principle of accuracy, including functionalities that ensure that data that is identified as inaccurate may be erased or rectified without delay.

5.5.8 Scheme Clients shall keep a record of any challenges to the accuracy of personal data and where they acknowledge a mistake, that personal data shall be clearly identified as a mistake.

5.5.9 Where appropriate, Scheme Clients shall provide user documentation to relying parties with all relevant guidance about actions to be taken by the relying party in order to comply with accuracy requirements.

Note 1: In practice, this means that Scheme Clients should:

a) take reasonable steps to ensure the accuracy of any personal data;
b) ensure that the source and status of personal data is clear;
c) carefully consider any challenges to the accuracy of information; and

d) consider whether it is necessary to periodically update the information.

Note 2: There is often confusion about whether it is appropriate to keep records of things that happened which should not have happened. Individuals understandably do not want their records to be tarnished by inaccurate records. However, Scheme Clients may legitimately need their records to accurately reflect the order of events. Keeping a record of the mistake and its correction might also be in the individual's best interests. It is acceptable to keep records of mistakes, provided those records are not misleading about the facts. Scheme Clients may need to add a note to make it clear that a mistake was made.

Note 3: It may be impractical to check the accuracy of personal data someone else provides. In order to ensure that the records are not inaccurate or misleading in this case, Scheme Clients should:

a) accurately record the information provided;
b) accurately record the source of the information;
c) take reasonable steps in the circumstances to ensure the accuracy of the information; and
d) carefully consider any challenges to the accuracy of the information.

Note 4: Individuals have the absolute right to have incorrect personal data rectified. Individuals do not have the right to erasure just because data is inaccurate. However, the accuracy principle requires Scheme Clients to take all reasonable steps to erase or rectify inaccurate data without delay, and it may be reasonable to erase the data in some cases. If an individual asks for deletion of the inaccurate data it is therefore good practice to consider this request (See section 5.7.9 – 5.7.11).

5.6 Storage Limitation

5.6.1 **Scheme Clients shall maintain a record of the types of personal data held and the purpose that it is held. This shall include documented justification for how long the personal data is kept.**

5.6.2 **Scheme Clients shall ensure that any personal data is held in accordance with documented storage retention policies (See Section 4.3.8 – 4.3.9).**

5.6.3 **Scheme Clients shall ensure that their processing systems are designed in a manner which fosters the principle of storage limitation, including functionalities that ensure that data that is automatically erased, regularly weeded, permanently deleted or anonymised in accordance with the documented storage retention policies.**

Note 1: Scheme Clients should provide deletion tools perhaps setting an automated deletion schedule (such as deletion after 30 days), instant deletion (such as once the purpose

has been discharged, the data is instantly deleted) or self-serve deletion (such as by the data subject, ad hoc requests or record correction/duplication).

5.6.4 **Scheme Clients shall ensure that their systems provide for the ability to intervene in the processing operations in order to guarantee data subject rights and allow corrections, erasures or restrictions on the data.**

5.6.5 **Scheme Clients shall ensure that they anonymise any personal data kept for public interest archiving, scientific or historical research, or statistical purposes. They shall also need to have in place a storage retention policy or schedule for such data.**

Note 1: Scheme Clients should note that it is not necessary to retain any records of individual age attributes, primary credentials or any personal data for the purposes subsequent audit of compliance with these Scheme Rules. For relying parties, age check services and age exchange services depending upon the adopted process, it is not likely to be necessary for the Scheme to access personal data for certification monitoring.

Note 2: Scheme Clients should not keep the data for longer than they actually need it. Ensuring that Scheme Clients erase or anonymise personal data when they no longer need it reduces the risk that it becomes irrelevant, excessive, inaccurate or out of date and also reduces the risk that they use such data in error – to the detriment of all concerned. Retention policies or retention schedules list the types of record or information Scheme Clients hold, what they use it for, and how long they intend to keep it.

Note 3: Scheme Clients should consider their stated purposes for processing the personal data. They can keep it as long as one of those purposes still applies, but they should not keep data indefinitely 'just in case', or if there is only a small possibility that they shall use it. Future audits, where a sampling process is undertaken, should not be considered a suitable reason for retaining the whole data set. Sampling should be temporally aligned with the earliest opportunity that the sample can be reviewed and checked. Once checked, the sample should be returned to the data set and managed in accordance with the applicable data retention policy.

Note 4: Scheme Clients should also consider whether they need to keep a record of a relationship with the individual once that relationship ends. They may not need to delete all personal data when the relationship ends. They may need to keep some information so that they can confirm that the relationship existed – and that it has ended – as well as some of its details. In the context of age verification, it is unlikely that it would be necessary to retain a record of the relationship with the age verified party once that relationship has ended.

Note 5: When no longer needed, Scheme Clients can either erase (delete) or anonymise the data.

Note 6: Scheme Clients should remember that there is a significant difference between permanently deleting personal data and taking it offline. If personal data is stored offline, this should reduce its availability and the risk of misuse or mistake. However, they are still processing personal data. Scheme Clients should only store it offline (rather than delete it) if they can still justify holding it. Scheme Clients should be prepared to respond to subject access requests for personal data stored offline, and they should still comply with all the other principles and rights.

Note 7: Scheme Clients that utilise immutable ledgers (such as Blockchain) in order to store personal data, should develop methods for the ledger to be hashed or the cryptographic key to be such as to render the data stored in the chain to be irretrievable or anonymised once it becomes due for deletion. The process of maintaining the integrity of the immutable ledger should provide for privacy by design and the exercise of data subject rights.

5.7 Data Subject Rights

5.7.1 **All Scheme Clients shall ensure that data subject rights are respected.**

5.7.2 **Where possible, Scheme Clients shall provide online tools to enable data subjects to exercise their rights through 'self-service' options or, where self-service is not possible, through simplified online privacy management tools.**

5.7.3 **Scheme Clients shall ensure that applicable exemptions to Data Subject Rights are correctly applied. The applicable exemptions** are set out in Schedules 2,3 and 4 of the Data Protection Act 2018 or if a request is 'manifestly excessive or repetitive' Further information about the applicable exemptions can be found in ICO Guidance.

5.7.4 **Scheme Clients shall ensure that they notify any third parties if any rectification or erasure of personal data or restriction of processing has been carried out in accordance with Articles 16, 17(1) and 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.**

Right to Be Informed (Privacy Policy)

5.7.5 **Scheme Clients shall ensure that a privacy policy is produced and published on their website or app (in accordance with the requirements of Section 5.8 – Transparency), which shall contain (as a minimum):**

a) the name and contact details of the Scheme Client;
b) the name and contact details of any Data Protection representative in the United Kingdom used by the Scheme Client (if applicable - see section 1.15);

c) the contact details of the Data Protection Officer (if applicable)
d) the purposes of the processing;
e) the lawful basis for the processing;
f) the legitimate interests for the processing (if applicable);
g) the categories of personal data obtained (if the personal data is not obtained from the individual it relates to);
h) the recipients or categories of recipients of the personal data;
i) the details of transfers of the personal data to any third countries or international organisations (if applicable);
j) the retention periods for the personal data;
k) the rights available to individuals in respect of the processing;
l) the right to withdraw consent (if applicable);
m) the right to lodge a complaint with the ICO;
n) the source of the personal data (if the personal data is not obtained from the individual it relates to);
o) the details of whether individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to), including reference to specific age restrictions or control legislation where this is appropriate;
p) the details of the existence of automated decision-making, including profiling or use of age estimation artificial intelligence (if applicable) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

5.7.6 In addition to publishing their Privacy Policy on their website, Scheme Clients shall provide a link to it or a copy of it or provide a 'just-in-time' notice providing enough information at the point of collection with the ability to find out more from the full privacy policy:

a) at the time they start to collect their personal data from an individual;
b) if an individual seeks to exercise their data rights;
c) if an individual makes a complaint about the Scheme Client.

5.7.7 If a Scheme Client operates an age check service that is conducted on behalf of a client but without the direct knowledge of the individual (a 'stealth check'), the Scheme Client shall ensure that:

a) their client's website contains a warning to purchasers of age restricted goods that an age checking process would be undertaken and the identity of the organisation undertaking that process, with a link to the Scheme Client's privacy notice;
b) within a reasonable period (and no later than one month) of obtaining the personal data to carry out the age checking process, notify the individual of the Scheme Client's identity and provide a link to or copy of their Privacy Policy. This action can be undertaken by the Scheme Client or by their client.

Note 1: Scheme Clients should provide individuals with the necessary information in an easily accessible form. This applies equally if Scheme Clients collect personal data from the individual it relates to or if they obtain personal data from another source.

Note 2: Scheme Clients may meet this requirement by putting the information on their website (this is often how organisations deliver privacy information), however they should proactively make individuals aware of this information and they need to give them an easy way to access it. Simply putting it on the website, in case people happen to look there, is not enough.

Note 3: Scheme Clients could undertake an information audit to find out what personal data they hold and what they do with it. In preparing privacy information, Scheme Clients should put themselves in the position of the people they are collecting information about and they should carry out user testing to evaluate how effective their privacy information is.

The right of access

5.7.8 Scheme Clients shall ensure that they recognise, understand and address subject access requests. This shall include how verbal subject access requests are identified, recorded and addressed.

5.7.9 Scheme Clients shall respond to subject access requests within one calendar month, unless there is a lawful exemption to responding, which shall be explained to the data subject. If it is not possible to respond within one month, they shall contact the individual within one month and explain the permitted circumstances applicable to extend the time limit to respond to the request.

Note 1: The permitted circumstances are if the request is complex or Scheme Clients have received a number of requests from the individual, in which case, the time to respond can be extended by a further two months provided the Scheme Client has notified the data subject within one calendar month that an extension is being applied.

Note 2: The lawful exemptions to responding to a Subject Access Request are set out in Schedules 2,3 and 4 of the Data Protection Act 2018 or if a request is 'manifestly excessive or repetitive' Further information about the applicable exemptions can be found in ICO Guidance.

5.7.10 Scheme Clients shall explain a refusal to issue an age attribute token indicating that an individual is over 18, when the Scheme Client has determined that they are not and, therefore, the subject access request is received from a person that the Scheme Client believes may be a child. In such circumstances, the response shall be in clear and plain language appropriate to be understood by a child.

Note 1: Even if a child is too young to understand the implications of subject access rights, it is still the right of the child rather than of anyone else such as a parent or guardian.

So it is the child who has a right of access to the information held about them, even though in the case of young children these rights are likely to be exercised by those with parental responsibility for them. A common enquiry from a person with parental responsibly may be seeking to find out why their child has been granted access to an age restricted product, content or service.

Note 2: Before responding to a subject access request for information held about a child, Scheme Clients should consider whether the child is mature enough to understand their rights. If Scheme Clients are confident that the child can understand their rights, then they should usually respond directly to the child. They may, however, allow the parent to exercise the child's rights on their behalf if the child authorises this, or if it is evident that this is in the best interests of the child.

Note 3: What matters is that the child is able to understand (in broad terms) what it means to make a subject access request and how to interpret the information they receive as a result of doing so. When considering borderline cases, Scheme Clients should take into account, among other things:

a) the child's level of maturity and their ability to make decisions like this;
b) the nature of the personal data;
c) any court orders relating to parental access or responsibility that may apply;
d) any duty of confidence owed to the child or young person;
e) any consequences of allowing those with parental responsibility access to the child's or young person's information. This is particularly important if there have been allegations of abuse or ill treatment;
f) any detriment to the child or young person if individuals with parental responsibility cannot access this information;
g) any views the child or young person has on whether their parents should have access to information about them.

The right to rectification

5.7.11 **Scheme Clients shall ensure that they recognise, understand and address a request for rectification of allegedly inaccurate data. This shall include how verbal requests are identified, recorded and addressed.**

5.7.12 **Scheme Clients shall respond to the request for rectification within one calendar month. If it is not possible to respond within one month, they shall contact the individual within one month and explain the permitted circumstances applicable to extend the time limit to respond to the request.**

Note 1: The permitted circumstances are if the request is complex or Scheme Clients have received a number of requests from the individual, in which case, the time to respond can be extended by a further two months provided the Scheme Client has notified the data subject within one calendar month that an extension is being applied.

5.7.13 Scheme Clients shall notify any relying party of any rectification of inaccurate data that could reasonably have caused that relying party to make a transactional decision that was improper (i.e. they refused a sale of an age restricted item on the mistaken notification from the Scheme Client that the individual was under age).

Note 1: Scheme Clients should comply with a request for rectification without undue delay and at the latest within one month of receipt of the request or (if later) within one month of receipt of:

a) any information requested to confirm the requester's identity; or

b) a fee (only in certain circumstances). In most cases, Scheme Clients cannot charge a fee to comply with a request for rectification. However, Scheme Clients can charge a "reasonable fee" for the administrative costs of complying with the request if it is manifestly unfounded or excessive. Scheme Clients should base the reasonable fee on the administrative costs of complying with the request.

Note 2: Scheme Clients should calculate the time limit from the day they receive the request (whether it is a working day or not) until the corresponding calendar date in the next month.

The right to erasure

5.7.14 Scheme Clients shall ensure that they recognise, understand and address a request for erasure of personal data. This shall include how verbal requests are identified, recorded and addressed.

5.7.15 Scheme Clients shall respond to the request for erasure of personal data within one calendar month. If it is not possible to respond within one month, they shall contact the individual within one month and explain the permitted circumstances applicable to extend the time limit to respond to the request.

Note 1: The permitted circumstances are if the request is complex or Scheme Clients have received a number of requests from the individual, in which case, the time to respond can be extended by a further two months provided the Scheme Client has notified the data subject within one calendar month that an extension is being applied.

5.7.16 Scheme Clients shall explain to the individual the consequences of the erasure of personal data including any diminished utility that the individual may experience (such as having to repeat age verification processes in the future).

Note 1: Scheme Clients should prepare for requests for erasure by doing the following:

a) recognise a request for erasure and understand when the right applies;
b) have a policy for how to record requests are received verbally;
c) understand when to refuse a request;

d) be aware of the information that is needed to provide to individuals when they do so.

Note 2: Complying with requests for erasure means that Scheme Clients should also consider the following:

a) have processes in place to ensure that the response to a request for erasure without undue delay and within one month of receipt;
b) be aware of the circumstances when they can extend the time limit to respond to a request;
c) understand that there is a particular emphasis on the right to erasure if the request relates to data collected from children;
d) have procedures in place to inform any recipients if they erase any data they have shared with them;
e) have appropriate methods in place to erase information.

The right to restrict processing

5.7.17 Scheme Clients shall ensure that they recognise, understand and address a request to restrict processing of personal data. This shall include how verbal requests are identified, recorded and addressed.

5.7.18 Scheme Clients shall restrict processing of an individual's data where:

a) the individual contests the accuracy of their personal data and the Scheme Client is verifying the accuracy of the data;
b) the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the UK GDPR) and the individual opposes erasure and requests restriction instead;
c) the personal data is no longer needed but the individual needs the Scheme Client to keep it in order to establish, exercise or defend a legal claim; or
d) the individual has objected to the processing of their data under Article 21(1), and the Scheme Client is considering whether their legitimate grounds for processing override those of the individual.

5.7.19 Scheme Clients shall respond to the request to restrict the processing of personal data within one calendar month. If it is not possible to respond within one month, they shall contact the individual within one month and explain the permitted circumstances applicable to extend the time limit to respond to the request.

Note 1: The permitted circumstances are if the request is complex or Scheme Clients have received a number of requests from the individual, in which case, the time to respond can be extended by a further two months provided the Scheme Client has notified the data subject within one calendar month that an extension is being applied.

5.7.20 **Scheme Clients shall explain to data subjects the consequences of restrictions on the processing of personal data, including any diminished utility that the individual may experience (such as having to repeat age verification processes in the future).**

Note 1: Scheme Clients can prepare for requests for restriction by assuring the below:

a) know how to recognise a request for restriction and how to understand when the right applies;
b) have a policy in place for how to record requests they receive verbally;
c) understand when they can refuse a request and are aware of the information they need to provide to individuals when they do so.

Note 2: In complying with requests for restriction of processing, Scheme Clients should:

a) have processes in place to ensure that they respond to a request for restriction without undue delay and within one month of receipt;
b) are aware of the circumstances when they can extend the time limit to respond to a request;
c) have appropriate methods in place to restrict the processing of personal data on their systems;
d) have appropriate methods in place to indicate on their systems that further processing has been restricted;
e) understand the circumstances when they can process personal data that has been restricted;
f) have procedures in place to inform any recipients if they restrict any data they have shared with their users;
g) understand that they need to tell individuals before they lift a restriction on processing.

The right to data portability

5.7.21 **Scheme Clients shall ensure that they recognise, understand and address a request to for data portability. This shall include how verbal requests are identified, recorded and addressed.**

Note 1: Data subjects have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
b) the processing is carried out by automated means.

5.7.22 Where a request for data portability is to be refused, Scheme Clients shall communicate the reasons for that decision to the data subject.

5.7.23 Scheme Clients shall respond to the request for data portability within one calendar month. If it is not possible to respond within one month, they shall contact the individual within one month and explain the permitted circumstances applicable to extend the time limit to respond to the request.

Note 1: The permitted circumstances are if the request is complex or Scheme Clients have received a number of requests from the individual, in which case, the time to respond can be extended by a further two months provided the Scheme Client has notified the data subject within one calendar month that an extension is being applied.

5.7.24 Scheme Clients can comply with data portability by subscribing to or engaging with a relevant trade association interoperability framework or Age Check Exchange. This framework or Age Check Exchange shall be certified in accordance with PAS 1296:2018.

Note 1: The right to data portability gives individuals the right to receive personal data they have provided to a controller in a structured, commonly used and machine readable format. It also gives them the right to request that a controller transmits this data directly to another controller.

Note 2: The right to data portability entitles an individual to:

- *receive a copy of their personal data; and*
- *have their personal data transmitted from one controller to another controller.*

Note 3: Individuals have the right to receive their personal data and store it for further personal use. This allows the individual to manage and reuse their personal data. For example, an individual wants to retrieve their contact list from a webmail application to build a wedding list or to store their data in a personal data store.

Note 4: Scheme Clients can achieve this by either:

a) directly transmitting the requested data to the individual, or
b) providing access to an automated tool that allows the individual to extract the requested data themselves.

Note 5: This does not create an obligation for Scheme Clients to allow individuals more general and routine access to their systems – only for the extraction of their data following a portability request. In addition, it does not require Scheme Clients to provide users with access to cryptographic keys or other hash data to access immutable ledgers.

Note 6: Scheme Clients may have a preferred method of providing the information requested depending on the amount and complexity of the data requested. In either case, Scheme Clients need to ensure that the method is secure.

The right to object

5.7.25 Scheme Clients shall ensure that they recognise, understand and address an objection to data processing. This shall include how verbal requests are identified, recorded and addressed.

5.7.26 Scheme Clients shall respond to the objection to data processing within one calendar month. If it is not possible to respond within one month, they shall contact the individual within one month and explain the permitted circumstances applicable to extend the time limit to respond to the request.

Note 1: The permitted circumstances are if the request is complex or Scheme Clients have received a number of requests from the individual, in which case, the time to respond can be extended by a further two months provided the Scheme Client has notified the data subject within one calendar month that an extension is being applied.

5.7.27 Scheme Clients shall explain the consequences of objecting to data processing to the data subject, including any diminished utility that the individual may experience (such as having to repeat age verification processes in the future).

5.7.28 Scheme Clients should note that individuals have an absolute right to stop their data being used for direct marketing. The processing of personal data for the purposes of direct marketing is not in scope for this Scheme.

Note 1: Individuals can not object if the processing is necessary for:

a) a task carried out in the public interest;
b) the exercise of official authority vested in the Scheme Client;
c) the Scheme Client's legitimate interests (or those of a third party).

Note 2: Where Scheme Clients have received an objection to the processing of personal data and they have no grounds to refuse, Scheme Clients should stop or not begin processing the data.

Note 3: This may mean that Scheme Clients should erase personal data as the definition of processing under the UK GDPR is broad, and includes storing data. However, as noted above, this may not always be the most appropriate action to take.

Rights in relation to automated decision making and profiling

5.7.29 Scheme Clients shall have identified if the processing being certified engages automated decision making or profiling. This shall either be:

a) automated individual decision-making (making a decision solely by automated means without any human involvement); or

b) **profiling (automated processing of personal data to evaluate certain things about an individual).**

Note 1: Profiling can be part of an automated decision-making process.

5.7.30 **Scheme Clients providing an age checking service or age assurance within the context of an information society service and that determines if an individual is likely to be over or under a defined age or between an age range by reference to biometric or inherent features, shall identify and record if it is an automated decision-making process even if, by default, a negative result requires human intervention to carry out alternate age verification processes.**

Note 1: Some of the methods companies may wish to consider for age verification:

a) *Self-declaration – This is where a user simply states their age but does not provide any evidence to confirm it. It may be suitable for low risk processing or when used in conjunction with other techniques.*
b) *Artificial intelligence – It may be possible to make an estimate of a user's age by using artificial intelligence to analyse the way in which the user interacts with a company's service. Similarly, the company could use this type of profiling to check that the way a user interacts with their service is consistent with their self-declared age. This technique typically provides a greater level of certainty about the age of users with increased use of the service.*
c) *Third party age verification services – Scheme Clients may choose to use a third party service to provide an assurance of the age of the users (where they are not the age verification service themselves). Such services typically work on an 'attribute' system where they request confirmation of a particular user attribute (in this case age or age range) and the service provides them with a 'yes' or 'no' answer. This method reduces the amount of personal data clients need to collect and may allow them to take advantage of technological expertise and latest developments in the field.*
d) *Account holder confirmation – Scheme Clients may be able to rely upon confirmation of user age from an existing account holder who they know to be an adult. For example, if they provide a logged-in or subscription based service, they may allow the main (confirmed adult) account holder to set up child profiles, restrict further access with a password or PIN, or simply confirm the age range of additional account users.*
e) *Technical measures – Technical measures which discourage false declarations of age, or identify and close under age accounts, may be useful to support or strengthen self-declaration mechanisms. Examples include neutral presentation of age declaration screens (rather than nudging towards the selection of certain ages), or preventing users from immediately resubmitting a new age if they are denied access to the service when they first self-declare their age.*
f) *Hard identifiers – Scheme Clients can confirm age using solutions which link back to formal identify documents or 'hard identifiers' such as a passport.*

5.7.31 Scheme Clients shall not carry out profiling of performance at work, economic situation, health, personal preferences, interests, reliability, location or movements. This includes the augmentation of data with other data that may, when taken collectively, create a profile of any of these features of an individual. This would include, for instance, databases that may show information about an individual's browsing habits or interests connected to age restricted goods, content or services.

5.7.32 Scheme Clients that are Age Check Services shall not carry out profiling of personal data for marketing purposes. Scheme Clients that are Information Society Services may only carry out profiling of personal data for marketing purposes in accordance with the requirements of ACCS 3, s. 5.12.

5.7.33 Scheme Clients shall act transparently, with publicly available information about the algorithms used, automated or semi-automated decision making, retention and uses of data; for automated decision-making and profiling.

Note 1: Such information does not have to reveal proprietary or commercially confidential information, but should provide sufficient detail to enable an average individual to understand how their data is processed in the automated decision-making and profiling. The published information may contain information about the statistical accuracy of the automated decision-making and profiling when tested.

5.7.34 Scheme Clients shall test any age estimation systems to secure mitigation of inherent bias on grounds of race, sex or disability. Such variances caused by inherent bias shall not be such as to establish prohibited conduct under Part 2 of the Equalities Act 2010 and shall be accompanied by an Equalities Impact Assessment (even if one is not required by the Public Sector Equalities Duty under the Equalities Act 2010).

5.7.35 Scheme Clients shall publish an automated decision-making and profiling ethics statement, which shall include reference, where appropriate, to the United Kingdom's Data Ethics Framework.

Note 1: Scheme Clients should:

a) provide meaningful information about the logic involved in the decision-making process, as well as the significance and the envisaged consequences for the individual;
b) use appropriate mathematical or statistical procedures;
c) ensure that individuals can obtain human intervention, express their point of view; and obtain an explanation of the decision and challenge it;
d) put appropriate technical and organisational measures in place, so that they can correct inaccuracies and minimise the risk of errors;
e) secure personal data in a way that is proportionate to the risk to the interests and rights of the individual, and that prevents discriminatory effects.

5.7.36 Scheme Clients shall provide for data subjects to exercise their rights in relation to automated decision making and profiling, including:

a) the right to request human intervention;
b) the right to express their point of view; and
c) the right to contest the decision

5.7.37 Scheme Clients shall not make decisions based solely on automated processing about children if this will have a legal or similarly significant effect on them; unless:

a) it is necessary for the performance of a contract between child and data controller, and the controller has put in place suitable measures to safeguard the child's rights, freedoms and legitimate interests;
b) it is authorised by UK law which includes suitable measures to safeguard the child's rights, freedoms and legitimate interests;
c) it is based on the child's explicit consent, and the controller has put in place suitable measures to safeguard the child's rights, freedoms and legitimate interests

5.8 Transparency

5.8.1 Scheme Clients shall make the current version of their privacy policy publicly available through a website or app, but should also keep previous versions of the policy that would have been applicable at the time that current personal data held by the Scheme Client was initially collected.

5.8.2 Scheme Clients shall ensure that by default individuals are told why, when, where and how their personal data is being processed, and by which organisations (including ensuring a UK-based representative is appointed and notified to the individual).

5.8.3 Where an age check service is processing the personal data of children, in addition to the above including gaining the consent of the data subject, the Scheme Client should (for children aged 13 – 18) or shall (for children aged under 13):

a) publish a clear and comprehensive online privacy policy describing their information practices for personal information collected online from children;
b) provide direct notice to parents or lawful guardians and obtain verifiable parental/lawful guardian consent before collecting personal information online from children (parental consent is only required under Article 8 of UK GDPR if the lawful basis of processing being relied upon is consent (Article 6(1)(a)));
c) give parents/lawful guardians the choice of consenting to the operator's collection and internal use of a child's information, but prohibit the operator from disclosing that information to third parties (unless disclosure is integral to the site or service, in which case, this shall be made clear to parents);
d) provide parents/lawful guardians access to their child's personal information to review and/or have the information deleted;
e) give parents/lawful guardians the opportunity to prevent further use or online collection of a child's personal information;

f) maintain the confidentiality, security and integrity of information they collect from children, including by taking reasonable steps to release such information only to parties capable of maintaining its confidentiality and security; and
g) retain personal information collected online from a child for only as long as is necessary to fulfil the purpose for which it was collected, and delete the information using reasonable measures to protect against its unauthorised access or use.

5.8.4 Scheme Clients should ensure that they tell individuals about their processing in a way that is easily accessible and easy to understand. Scheme Clients shall use clear and plain language.

Note 1: Transparency is important, but especially in situations where individuals have a choice about whether they wish to enter into a relationship with the Scheme Clients. If individuals know at the outset what the Scheme Clients shall use their information for, they shall be able to make an informed decision about whether to enter into a relationship, or perhaps to try to renegotiate the terms of that relationship.

Note 2: Transparency is important even when Scheme Clients have no direct relationship with the individual and collect their personal data from another source. In some cases, it can be even more important - as individuals may have no idea what the data is collected and used for, and this affects their ability to assert their rights over their data. This is sometimes known as 'invisible processing'.

5.9 Special Category Data and Biometrics

5.9.1 Scheme Clients shall only process biometric data where used as a means of unique identification of an individual in accordance with the requirements for handling special category data.

5.9.2 Scheme Clients shall implement specific safeguards for the processing of special category data including:

a) documenting the types of biometric information used, including whether or not it is used for identification purposes;
b) undertaking a specific Data Protection Impact Assessment on the use of special category data which may be accompanied by an Appropriate Policy Document relating to the specific conditions in Schedule 1 of the Data Protection Act 2018;
c) providing information about the handling of biometric information in their privacy policy.

Note 1: Facial imaging and fingerprint data are just two examples of biometric data used as a means of unique identification of an individual, but these are not exhaustive. Many other types of physical, physiological or behavioural 'fingerprinting' fall within the definition.

Examples of physical or physiological biometric identification techniques include:

- *facial recognition;*
- *fingerprint verification;*
- *iris scanning;*
- *retinal analysis;*
- *voice recognition; and*
- *ear shape recognition.*

Examples of behavioural biometric identification techniques:

- *keystroke analysis;*
- *handwritten signature analysis;*
- *gait analysis; and*
- *gaze analysis (eye tracking).*

Note 2: Scheme Clients that process digital photographs of individuals should note that this is not automatically biometric data even if used for identification purposes. Although a digital image may allow for identification using physical characteristics, it only becomes biometric data if subject to "specific technical processing". Usually this involves using the image data to create an individual digital template or profile, which in turn is used for automated image matching and identification.

Note 3: All biometric data is personal data, as it allows or confirms the identification of an individual. Biometric data is also special category data whenever it is processed "for the purpose of uniquely identifying a natural person". This means that biometric data will be special category data in the vast majority of cases. If biometrics are used to learn something about an individual (such as their age), authenticate their identity, control their access, make a decision about them, or treat them differently in any way, it is likely to be considered processing of special category data.

5.10 International Transfers

5.10.1 **Scheme Clients may transfer personal data to a third country or an international organisation only if the transfer is compliant with one of the provisions expressed in articles 44, 45 and 46 of UK GDPR or as permitted by UK data protection legislation.**

5.10.2 **A Scheme Client contemplating an international transfer of data shall:**

a) determine if it is a restricted transfer of data, taking into account the requirements imposed by the United Kingdom leaving the European Union;
b) determine if the transfer is covered by adequacy regulations;
c) determine if the transfer is covered by appropriate safeguards;
d) determine if the transfer is covered by an exception set out in article 49 of UK GDPR;
e) undertake a transfer impact assessment to ensure data will continue to have essentially equivalent level of protection as in the UK.

Note 1: Adequacy regulations could be applicable for data transferring out of the UK if the UK Secretary of State has made such regulations under s.17A of the Data Protection Act 2018 or for data transferring into the UK if the source country (or an international organisation such as the EU) has made a reciprocal adequacy decision under the data protection laws applicable in that third country or international organisation.

Note 2: An appropriate safeguard could include standard contractual clauses (SCC's) prescribed in Regulations under s.17C of the Data Protection Act 2018 or, for important reasons of public interest in accordance with Regulations under s.18 of the Data Protection Act 2018. Scheme Clients should refer to the latest ICO Guidance on the current list of appropriate safeguards.

5.10.3 Scheme Clients shall keep a record of any international transfers of personal data that take place.

5.10.4 A Scheme Client shall identify data acquired from anywhere outside the UK before 31st December 2020 (known as 'legacy data' and held under the 'frozen GDPR' provisions in place before the United Kingdom exited the European Union).

Note 1: 'Frozen GDPR' is important protection for data obtained from anywhere overseas under the terms of EU GDPR and held by UK organisations. The Frozen GDPR does not apply to any personal data about individuals who are located in the UK.

5.10.5 A Scheme Client that is in the UK who offers goods or services to individuals in the EU, or monitors the behaviour of individuals in the EU, shall appoint a suitable representative in the EEA.

Note 1: A Scheme Client that offers goods or services, such as an age verification service, to a business established in the EU is not required to appoint a local suitable representative unless it intends to monitor the ongoing behaviour of individuals in the EU (however, Scheme Clients should note that by virtue of s. 5.7.30 and 5.7.31 of these technical requirements, the monitoring of behaviour of individuals for most purposes is prohibited).

5.11 Data Sharing

5.11.1 Scheme Clients may share personal data in a fair and proportionate way in accordance with UK GDPR.

Note 1: Nothing in these Technical Requirements place any obligation on Scheme Clients to share their personal data, however, Scheme Clients may be placed under certain lawful obligations by third parties (particularly law enforcement authorities) to do so and, where this occurs, Scheme Clients should exercise appropriate verification of those obligations and due diligence on the identity, process, security and technical organisational measures in place to facilitate that data sharing activity.

Note 2: In making decisions about sharing personal data, Scheme Clients may find the ICO's Data Sharing Code and checklist useful.

5.11.2 Scheme Clients shall include their plans for data sharing, or the circumstances in which it will consider data sharing, in their Data Protection Impact Assessment (see Section 4.6).

5.11.3 Scheme Clients shall record the parameters of their data sharing with third parties in a Data Sharing Agreement. This shall include:

a) carrying out a Data Protection Impact Assessment (see Section 4.6) specifically in relation to the proposed sharing (except in situations where Section 5.11.5 applies);
b) documenting the data to be shared, including the nature of the data records, the start and end date of the data records;
c) the providence of the data (such as the Vectors of Trust or Levels of Assurance associated with data – see ACCS 4 – Technical Requirements for Age Check Providers and PAS 1296 for more information about this);
d) the due diligence undertaken on the recipient of the data, including any controls or restrictions placed upon the recipient for use of the data.

5.11.4 Scheme Clients shall identify and record the lawful basis of data sharing before sharing any personal information (this is different to the lawful basis of collecting data for processing).

Note 1: The lawful basis for data sharing may not be the same as the lawful basis that the Scheme Client relied upon in the first place when collecting that data. As an example, the Scheme Client may have relied upon a contract when collecting the data, but during the lifetime of holding the data, the Scheme Client became aware of something affecting the vital interests (life or death) of the individual and decides, proactively, to share that data with a third party, such as the police.

5.11.5 Scheme Clients shall plan for the potential need to share data in an emergency where it is necessary and proportionate to do so.

Note 1: There is no need for a data sharing agreement to be in place where an emergency situation occurs.

Note 2: An emergency situation includes:

- *preventing serious physical harm to a person;*
- *preventing loss of human life;*
- *protection of public health;*
- *safeguarding vulnerable adults or children;*
- *responding to an emergency; or*
- *an immediate need to protect national security*

5.11.6 Where Scheme Clients undertake sharing of the personal data of children they shall do so in the best interests of the child as a primary consideration.

Note 1: ACCS 3:2021 – Technical Requirements for Age Appropriate Design for Information Society Services has more detail about considerations of the best interests of the child.

5.11.7 **Scheme Clients shall record requests for data sharing together with the decision on whether or not to permit the data sharing and the reasons for reaching the conclusion that the Scheme Client has reached.**

6. Technical Evaluation

6.1 Test Protocols (Method of Evaluation)

6.1.1 The Conformity Assessment Body for this Scheme shall establish the technical test protocols, including reference to the UK GDPR implications for the system under test (the Target of Evaluation, ToE).

6.1.2 The Conformity Assessment body for this Scheme shall undertake technical evaluation of the age verification system as appropriate. The Technical Evaluation can include any of the following activities, or any other relevant activities for the system submitted for evaluation:

a) **Bona Fide Test Crew Presentation** - Utilising a test crew for bona fide presentation to age verification systems. This can include for false/accurate accept rates; skin tone analysis; gender; age grouping; disfigurement; etc.
b) **Presentation Attack Detection** – Assessing PAD for both human-likeness, but not liveness analysis and also for identity assets presentation (both genuine and false identity assets). Utilising different presentation attack instruments, PAI species, and PAI series. Testing for 2D and 3D presentation objects. This is sometimes more commonly known as anti-spoofing testing.
c) **Detection Device Analysis** – Assess performance on multiple forms of detection devices – webcams, tablets, cameras, mobile telephones – different operating systems (such as Android, iOS, etc.) and at different presentation intensity, distance and angles. Testing device integrated equipment, such as gaming machines or till systems, subject to them being made available to the CAB at the testing studio.
d) **Ambient and Directed Lighting Analysis** – Assessing system capabilities under different types of ambient light, either presented at the presentation object or at the detection device. This includes for different light levels from supermarket-style overhead LED lighting, to pub-style sodium lighting, to casino-style multi coloured lighting, to strobe lighting and anything in between. This includes the capability for internal and outdoor lighting. The lighting can be directed ambient to the presentation object (i.e. the person being age estimated) or the detection device (i.e. the camera) or both.
e) **Electronic Identity Document Validation Technologies** – Testing system capabilities on identifying ID documents (such as Passports, Driving Licences or other official ID Cards), being able to extract relevant data from those documents (such as through Machine Readable Zones (MRZ) or Near Field Communication (NFC)) and present that data accurately to enable effective Age Determination.
f) **Social Proofing** – Assessing the analysis, with a user's consent, of their digital footprint and the related social graphs, which can be interrogated to determine the veracity of a self-asserted identity. This is the ability of systems to gain proof of age through analysis of the social contacts an individual has and asking those social contacts to verify or confirm the age attributes of the individual.

g) **Parental Consent** – Assessing the process of identifying and verifying a digital parent or capable guardian related to or responsible for an individual and gaining verification of the age group of the individual through information provided by that parent or capable guardian.
h) **Biometric Subject Behaviours** – Assessing systems deployed for identifying and analysing subject behaviours (such as squeezing together one's fingers in hand geometry and a biometric presentation in response to a directive cue, which are both voluntary reactions).
i) **In situ Testing** – Testing deployed units in real world scenarios. Typically, this comes after the initial certification and is part of the certification monitoring that is put in place to make sure that systems continue to perform as expected.
j) **Skin Tone Analysis** – Testing whether or not biometric systems are susceptible to skin tone bias (based on the Fitzpatrick Scale).

6.2 Penetration Testing

6.2.1 Scheme Clients shall establish a method of evaluation for vulnerability scanning and penetration testing of age check systems.

6.2.2 Penetration testing shall be undertaken by a CREST Certified Penetration Tester. The vulnerability scanning and penetration testing shall include the following activities (where relevant), or any other relevant activities for the system submitted for evaluation:

a) the requirements for external vulnerability assessment and any file upload capabilities;
b) the requirements for server build assessment;
c) the requirements for firewall build assessment;
d) the requirements for database settings, storage and archiving assessment;
e) the requirements for web applications testing;
f) the requirements for other platform applications testing;
g) the requirements for application programming interface (API) testing, including calls and parameters per call.

About ACCS

The Age Check Certification Scheme is an independent not-for-profit certification scheme for providers of age restricted goods, content or services. We check that age systems work. Our scheme, backed by the Northern Powerhouse Investment Fund, can be utilised to provide full conformity assessment in accordance with all aspects of age restricted sales. We offer a range of services, including Test Purchasing, which deploys our award-winning Android & iOS App, and boast a state-of-the-art Age Check Test Studio which enables the scientific examination of age check systems.

Internationally recognised Standards

Our scheme provides evidence that your age check practices meet international standards.

Highly qualified certification officers

Our locally sourced certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

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Standards and Technical Requirements

ACCS 3:2021

Technical Requirements for Age Appropriate Design for Information Society Services

The certification criteria contained within this document have been approved by the Information Commissioner's Office in accordance with the Commissioner's tasks and powers under Articles 57(1)(n) and 58(3)(f) pursuant to Article 42(5) of the UK General Data Protection Regulation.

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ACCS 3:2021

Technical Requirements for Age Appropriate Design for Information Society Services

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Introduction

The Age Check Certification Scheme tests that age check systems work. These can be an integral part of information society services that may be intended for or accessed by children; or may be specifically intended only for use by adults. As an extension of this work, the Scheme can also assess conformity with technical requirements for age appropriate design for online services.

Under s.123 of the Data Protection Act 2018, the UK Information Commissioner has published a Code of Practice for the Age Appropriate Design of Information Society Services. This is sometimes known as **the Children's Code** and will be referred to as **'the Code'** within this document. It is rooted in the United Nations Convention on the Rights of the Child (UNCRC) that recognises the special safeguards children need in all aspects of their life, including General Comment 25 on the Digital Rights for Children. Data protection law in the UK reflects this and provides its own additional safeguards for children.

The code, and this Certification Scheme supporting it, is the first of its kind, but it reflects the global direction of travel with similar reform being considered in the USA, Europe and globally by the Organisation for Economic Co-operation and Development (OECD).

These technical requirements only cover data processing **in the context of** the application of the Children's Code to the data processing of information society services to demonstrate conformity with the Code. They do not cover the broader data processing activities of Scheme Clients.

The Scheme is operated through our UKAS accredited conformity assessment body (Age Check Certification Services Ltd) and the certification criteria contained within this document have been approved by the Information Commissioner's Office in accordance with the Commissioner's tasks and powers under Articles 57(1)(n) and 58(3)(f) pursuant to Article 42(5) of the UK GDPR.

The Scheme has set out ACCS 2:2021 – Technical Requirements for Data Protection and Privacy, which apply **in addition to** the technical requirements set out in this document insofar as they apply to the context of application of the Code to the Scheme Client's data processing. To avoid unnecessary duplication, sections of these technical requirements cross reference with ACCS 2:2021 where appropriate.

This document defines the technical, organisational and documentary requirements that Information Society Services in scope need to demonstrate to conform with the requirements of the Code. The requirements are set out in 15 sections of these technical requirements, that align with the Code:

(a) **Best interests of the child:** The best interests of the child should be a primary consideration when you design and develop online services likely to be accessed by a child.

(b) **Data protection impact assessments:** Undertake a DPIA to assess and mitigate risks to the rights and freedoms of children who are likely to access your service, which arise from your

data processing. Take into account differing ages, capacities and development needs and ensure that your DPIA builds in compliance with this code.

(c) **Age appropriate application:** Take a risk-based approach to recognising the age of individual users and ensure you effectively apply the standards in this code to child users. Either establish age with a level of certainty that is appropriate to the risks to the rights and freedoms of children that arise from your data processing, or apply the standards in this code to all your users instead.

(d) **Transparency:** The privacy information you provide to users, and other published terms, policies and community standards, must be concise, prominent and in clear language suited to the age of the child. Provide additional specific 'bite-sized' explanations about how you use personal data at the point that use is activated.

(e) **Detrimental use of data:** Do not use children's personal data in ways that have been shown to be detrimental to their wellbeing, or that go against industry codes of practice, other regulatory provisions or Government advice.

(f) **Policies and community standards:** Uphold your own published terms, policies and community standards (including but not limited to privacy policies, age restriction, behaviour rules and content policies).

(g) **Default settings:** Settings must be 'high privacy' by default (unless you can demonstrate a compelling reason for a different default setting, taking account of the best interests of the child).

(h) **Data minimisation:** Collect and retain only the minimum amount of personal data you need to provide the elements of your service in which a child is actively and knowingly engaged. Give children separate choices over which elements they wish to activate.

(i) **Data sharing:** Do not disclose children's data unless you can demonstrate a compelling reason to do so, taking account of the best interests of the child.

(j) **Geolocation:** Switch geolocation options off by default (unless you can demonstrate a compelling reason for geolocation to be switched on by default, taking account of the best interests of the child). Provide an obvious sign for children when location tracking is active. Options which make a child's location visible to others must default back to 'off' at the end of each session.

(k) **Parental controls:** If you provide parental controls, give the child age appropriate information about this. If your online service allows a parent or carer to monitor their child's online activity or track their location, provide an obvious sign to the child when they are being monitored.

(l) **Profiling:** Switch options which use profiling 'off' by default (unless you can demonstrate a compelling reason for profiling to be on by default, taking account of the best interests of the child). Only allow profiling if you have appropriate measures in place to protect the child from any harmful effects (in particular, being fed content that is detrimental to their health or wellbeing).

(m) **Nudge techniques:** Do not use nudge techniques to lead or encourage children to provide unnecessary personal data or weaken or turn off their privacy protections.

(n) **Connected toys and devices:** If you provide a connected toy or device, ensure you include effective tools to enable conformance to this code.

(o) **Online tools:** Provide prominent and accessible tools to help children exercise their data protection rights and report concerns.

Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguarding concerns and their rights in relation to the processing of personal data. Any information given to, or provided in communication with, a child shall be in such a clear and plain language that the child can easily understand. Where a child asks a business to provide a service for which payment is normally made and processes data on the basis of consent, parental consent may be required unless the child is aged 13 years or over[1]. These technical requirements recognise that organisations carrying out age assessments and providing information society services have particular responsibilities when handling the personal data of a child.

Any certification against the Age Check Certification Scheme does not reduce the responsibility of the data controller or the data processor to comply with UK GDPR and is without prejudice to the tasks and powers of the ICO. However, gaining independent 3rd party certification from an ICO approved certification scheme can help you demonstrate your conformance to the code if they ask you to do so. You can do this by providing a copy of your certificate of conformity. We also notify the ICO that a Certificate of Conformity has been issued to you and the ICO will take this into account as part of any subsequent investigation.

The Age Check Certification Scheme Rules and these Technical Requirements have been designed to comply with ISO/IEC 17065:2012, the Information Commissioner's UK additional accreditation requirements for certification bodies, the relevant regulatory requirements for age verification service providers, the provisions of UK GDPR, the appropriate product and service standards and the requirements of the Trade Mark Rules 2008.

[1] Article 8 of UK GDPR restricts the processing of children's data where the lawful basis of consent is used to require the consent of a holder of parental responsibility over the child where the child is under 16 years of age. However, UK GDPR amends that (as is permitted by UK GDPR) to be 13 years of age.

1. Scope

1.1 The suite of Age Check Certification Scheme (ACCS) Standards (described in Section 2 – Normative References) are applicable to Scheme Clients submitting their products, processes or services for certification from ACCS and who wish to have access to use of the ACCS certification mark as a mark of conformity. These technical requirements specifically cover the processing of personal data within those products, processes or services as the object of the UK GDPR certification in the context of applying the Age Appropriate Design Code to the Scheme Client's data processing.

PLEASE NOTE: These Technical Requirements do not cover all of the data processing operations of information society services. They only cover the application of the Age Appropriate Design Code to their data processing and how the Scheme Clients have addressed the implications of the Code on decisions made, policies generated, information published and securing the data rights of children in the context of acting in the best interests of the child.

Scope of Scheme Criteria for Information Society Services

1.2 These technical requirements apply to the data processing operations of any information society services likely to be accessed by children in the UK. This includes many apps, programs, connected toys and devices, search engines, social media platforms, streaming services, online games, news or educational websites and websites offering other goods or services to users over the internet. It is not restricted to services specifically directed at children.

Types of Information Society Services in Scope

1.3 These technical requirements apply to any Scheme Client that processes data for services likely to be accessed by children including:

a) Coding and functionality of apps, programs and websites including search engines;
b) Providing social media platforms, online messaging, chat or user generated content;
c) Provision of internet based voice telephony services;
d) Online marketplaces;
e) Provision of content streaming services (e.g. video, music or gaming services) including Audio Visual Media Services;
f) Online games;
g) News or educational websites (but note some significant exemptions applicable to these services);
h) any websites offering other goods or services to users over the internet; and

i) the provision of electronic services for controlling connected toys and other connected devices.

1.4 If the service is designed for and aimed specifically at under-18s then these technical requirements apply. However, the provision in section 123 of the DPA is wider than this. It also applies to services that are not specifically aimed or targeted at children, but are nonetheless likely to be used by under-18s and are therefore within the scope of these technical requirements.

1.5 In practice, whether the information society service is likely to be accessed by children or not is likely to depend on:

a) the nature and content of the service and whether that has particular appeal for children; and
b) the way in which the service is accessed and any measures that are put in place to prevent children gaining access, such as the application of age assurance or age verification systems.

1.6 If the information society service is not aimed at children but is not inappropriate for them to use either, then the focus should be on assessing how appealing the service can be to them. If the nature, content or presentation of the service is such that children want to use it, then these technical requirements apply.

Types of Information Society Services Not in Scope

1.7 The following types of information society services are not in scope for this certification scheme (or the Code):

a) a public authority providing online public services on a non-commercial basis;
b) a police force or other competent authority processing personal data for law enforcement purposes;
c) a provider of a website that just provides information about their real-world business, but does not allow customers to buy products online or access a specific online service;
d) a provider of an online booking service for an in-person appointment;
e) a provider of voice telephony services unless they are internet based voice calling services (VOIP);
f) a provider of scheduled television or radio transmissions that are broadcast to a general audience, rather than at the request of the individual – called 'on-demand' services (even if the channel is broadcast over the internet);
g) a provider of online counselling or other preventative services (such as health screenings or check-ups) to children.

Types of Data Processing by Information Society Services in Scope

1.8 Scheme Clients providing information society services likely to be accessed by children may be undertaking one or more of the following types of data processing (this is not an exhaustive list):

a) Data acquisition – including the process of gathering data from users about their usage of the information society service;
b) Customer and user records – enabling account creation, user authentication and identification (including facial recognition or fingerprint data);
c) Authentication Tokens - the provision of data packets that provide a user with ongoing authentication records (such as cookies);
d) Demographic data – enabling monitoring, targeting and tailoring of services to different demographics or audience segmentation (including age groups, socio-economic or cultural backgrounds)
e) Age Attributes - gathering of claimed age attributes and verification of these against a reliable source of authentication, perhaps through certified Age Check processes described in ACCS 4 – Technical Requirements for Age Check Services;
f) Consent, including 3rd party parental or guardianship consent – including any processing of data indicating agreement to the processing of personal data relating to him or her or their child or a child that they exercise parental responsibility for;
g) Personal Identifiable Information – gathering of data from users about their personal identity, behaviours and history;
h) User Generated Content – including images, videos, media files, articles, 'posts', chat and interactive content;
i) Data storage – including location of servers, centralised or de-centralised storage, encryption and retention/accessibility;
j) Technical data processing – such as cyber security measures, physical security, systems protection and information systems management systems;
k) Commoditisation of data – such as providing data to organisations (whether for a fee or not) for the purpose of facilitating advertising, supplying content or services, algorithmic driven services or communications to children;
l) Interoperability Systems – such as connected toys and devices, inter-game interoperability, cross-platform data sharing, metadata and structured datasets (such as those established to support data portability);
m) Profiling – including automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to behaviours of children such as tracking online activity, behaviours, interests, opinions and beliefs;
n) Biometric Data – including processing of biometric or inherent features for identification, health records, movement and capability (such as cognitive skill) data;
o) Compliance data – including monitoring, moderating or implementing compliance with policies and community standards, industry codes of practice or legal obligations;

p) Geolocation data – including the ability to track, monitor and share historical movement, current location or predict future movement of children;
q) Relationship data – including relationships with parents, guardians, relatives, other children or other users of the information society service (including intimate or close relationships)
r) Special Category Data – including origins, political views, religious or philosophical beliefs, genetic information, health data, biometrics, sex life (including specifically children exploring their sexual orientation, behaviours and beliefs) and involvement in criminal activity or similar security measures;
s) Mental Health data – including current or past mood, outlook, aspirations, intent and specifically monitoring for suicide or self-harm;
t) Enabling data rights – including services that support children exercising their data rights or working with parents or guardians to support asserting data rights on behalf of the child;
u) International data processing – where targets of evaluation utilise data resources from outside of the United Kingdom.

Processing by Information Society Services Not In Scope

1.9 These technical requirements do not apply to the processing of any personal data that does not take place in the context of the Scheme Client's approach to implementation of the Age Appropriate Design Code.

1.10 The types of data processing not in scope include (but are not limited to):

a) Adult Services – including any services exclusively provided for the use of or enjoyment by adults (and where appropriate age verification is in place);
b) Public Services – including the processing of data by any public body on a non-commercial basis for the purpose of providing public services to or on behalf of children;
c) Internal Employee Records – including the processing of data about individual employees, contractors or service providers to the Scheme Client;
d) Commercial Relationships – including the processing of data to facilitate the arrangements between corporate entities in a supply chain or service fulfilment (save to the extent that such data processing affects the data rights of children); and
e) Elections – including the processing of data relating to any election for public office where an elector is required by law to be over 18.

Target of Evaluation for Information Society Services

1.11 The Target of Evaluation is all processing of personal data by the Scheme Client's information society service likely to be used by children.

1.12 The Scheme Client shall define the targeted processing operations concerned with the delivery of their information society service and describe them in terms of:

a) data types, systems and processes used;
b) where the processing subject to evaluation starts and ends;
c) any interfaces and interdependent processing operations;
d) all relevant processing operations, illustration of data flows;
e) any processing on shared or externally hosted systems or by data processors acting on behalf of the Scheme Client;
f) a determination of the Target of Evaluation's area of application; and
g) any special types of processing e.g. automated decision making, profiling, high risk processing.

1.13 The Scheme Client shall define any processing operations that are outside the scope of the certification and provide an explanation as to why they have included or excluded certain aspects of their processing.

1.14 An accurate specification of the Target of Evaluation is of fundamental importance for the certification procedure as it decides on what is covered by the certification.

1.15 The Target of Evaluation shall be described on the Certification Documentation.

1.16 The relevant scope set out above shall be determined for each information society service submitted for evaluation as a part of the application review process.

1.17 The relevant scope shall include the identification of any special category data (such as inherent or biometric features) or any processing of data for automated decision making.

Territorial Scope

1.18 These technical requirements apply to any information society services:

a) that are established in the United Kingdom;
b) that are established outside of the United Kingdom but either:
    a. offer goods or services (even if for free) to individuals in the United Kingdom, or
    b. monitor the behaviour of individuals in the United Kingdom.

1.19 Scheme Clients that are non-UK organisations shall appoint a UK representative, with a mandate of authority to act on behalf of the Scheme Client in the UK. The UK representative may be an individual, or a company or organisation established in the UK, and shall be able to represent the Scheme Client regarding your obligations under the UK GDPR (e.g. a law firm, consultancy or private company).

2. Normative References

Age Check Certification Scheme

The Age Check Certification Scheme is built on a modular approach to applicable standards and technical requirements. As a part of the Application Review Process, a Certification Officer assesses the applicable requirements for the business model of the Scheme Client. The suite of applicable requirements is constantly changing as new methodologies emerge, new standards are developed and new technical requirements are introduced. A full comprehensive current list can be found on the Standards Section of the Scheme website, but include:

ACCS 0: 2021 – General Scheme Rules (covering the process of certification under ISO 17065:2012);

ACCS 1: 2020 – Technical Requirements for Age Estimation Technologies;

ACCS 2: 2021 – Technical Requirements for Data Protection and Privacy*;

ACCS 3: 2021 – Technical Requirements for Age Appropriate Design for Information Society Services*;

ACCS 4: 2020 – Technical Requirements for Age Check Providers

ACCS 5: 2021 – Technical Requirements for Age Check System Penetration Testing and Vulnerability Scans; (In Development)

ACCS 6: 2021 – Technical Requirements for Parental Consent or Social Proofing for Age Gateway Technologies. (In Development)

** ACCS 2:2021 and ACCS 3:2021 are technical requirements that have been approved by the Information Commissioner's Office in accordance with the Commissioner's tasks and powers under Articles 57(1)(n) and 58(3)(f) pursuant to Article 42(5) of the UK GDPR.*

Legal Provisions

The principal legal provisions relevant to data processing by information society services are:

Communications Act 2003 as amended by various Audio Visual Media Services Regulations;

Data Protection Act 2018;

General Data Protection Regulation (EU) 2016/679 as it applies in the United Kingdom by the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 as amended;

Privacy and Electronic Communications Regulations 2003 (PECR)

National and International Standards

ISO 17065:2012 – Conformity assessment – Requirements for bodies certifying products, processes and services.

Scheme Clients should be aware that there are a series of emerging international and national standards relating to age appropriate design, which may be of use in preparation for audit. Once adopted, these may be referred to in future options for these technical requirements.

Other Documents

Scheme Clients will find a substantial amount of supporting materials, guidance, advice and templates to assist with preparing and implementing their data protection systems. This section provides a list of some of the relevant materials that have been used in the preparation of this scheme or may be useful to Scheme Clients.

Advertising Codes – from the Advertising Standards Authority

Age Appropriate Design Code

BGC Code of Conduct

BGC Code for Game Design

BGC Code for Socially Responsible Gambling Advertising

Portman Group Codes of Practice

UK code of practice for the self-regulation of new forms of content on mobiles

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3. Terms and definitions

In this document:

"shall" indicates a requirement

"should" indicates a recommendation

"may" indicates a permission

"can" indicates a possibility or a capability

GUIDANCE NOTES *are shown in italic text and are intended to assist the reader with understanding provisions.*

When referring to the ACCS Standards, refer to the ACCS Standard, followed by the year of issue, followed by the provision – such as **ACCS 0:2020, 4.3.**

3.1 **Age Appropriate Design Code (AADC)**	Means the Code of Practice laid before Parliament and issued under s.123 of the Data Protection Act 2018. In this document, this may be referred to as **'the Children's Code'** or **'the Code'.**
3.2 **Age Assurance**	Means the process of gaining a reliable indication of the age of an individual to an appropriate level of confidence.
3.3 **Age Check Practice Statement**	Means the document describing the operational practices and procedures of an age check service *[PAS 1296:2018 – 2.1.1]*.
3.4 **Age Estimation**	Means an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen.
3.5 **At a distance**	Means that the information society service is provided without the parties being simultaneously present;

3.6 **Best interests of the child**	Means that in all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration *[Article 3 of the United Nations Convention on the Rights of the Child (UNCRC)]*.
3.7 **Certification Requirement**	Means a specified requirement that is fulfilled by the client as a condition of establishing and maintaining certification *[ISO 17065:2012 – 3.7]*.
3.8 **Certification Scheme**	Means the Age Check Certification Scheme *[ISO 17065:2012 – 3.9]*.
3.9 **Client**	An organisation that has applied to the Scheme Conformity Assessment Body, Age Check Certification Services Ltd, for certification or been granted certification that is responsible to ACCS for ensuring that the certification requirements are fulfilled *[ISO 17065:2012 – 3.1]*.
3.10 **Consent**	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
3.11 **Controller**	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing of personal data.
3.12 **Data protection by design and default**	Means the appropriate technical and organisational measures as required by Article 25 of UK GDPR.
3.13 **Data Sharing Code**	Means the Code of Practice laid before Parliament and issued under s.121 of the Data Protection Act 2018.
3.14 **Electronic means**	Means that the service is sent initially and received at its destination by means of electronic equipment for the processing (including digital compression) and storage of data, and entirely transmitted, conveyed and received by wire, by radio, by optical means or by other electromagnetic means.

3.15 **Evaluation**	Means the combination of the selection and determination functions of conformity assessment activities against the scheme rules *[ISO 17065:2012 – 3.3]*.
3.16 **Geolocation**	Means data taken from a user's device which indicates the geographical location of that device, including GPS data or data about connection with local Wi-Fi equipment.
3.17 **High risk processing**	High risk processing can include the processing of: • special category data; • personal data of vulnerable natural persons, in particular of children; • personal aspects evaluated, in particular analysing or predicting aspects concerning performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements, in order to create or use personal profiles; • processing involving a large amount of personal data and affecting many data subjects.
3.18 **ICO**	Information Commissioner's Office.
3.19 **Individual request**	'at the individual request of a recipient of services' means that the service is provided through the transmission of data on individual request.
3.20 **Information society service**	Means any service normally provided for remuneration, at a distance, by electronic means and at the individual request of a recipient of services.
3.21 **Personal data**	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

3.22 **Personal data breach**	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
3.23 **Processor**	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
3.24 **Recipient**	A natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with UK law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
3.25 **Remuneration**	Means for money or money's worth and includes where the funding of the service doesn't come directly from the end user. *NOTE: For example, an online gaming app or search engine that is provided free to the end user but funded via advertising still comes within the definition of an Information Society Service. These requirements also cover not-for-profit apps, games and educational sites, as long as those services can be considered as 'economic activity' in a more general sense. For example, they are types of services which are typically provided on a commercial basis.*
3.26 **Scheme Owner**	Means the Age Check Certification Scheme Ltd *[ISO 17065:2012 – 3.11]*.
3.27 **Top management**	Person or group of people who directs and controls an organisation at the highest level.
3.28 **UKAS**	United Kingdom Accreditation Service.
3.29 **UNCRC**	United Nations Convention on the Rights of the Child.

3.30 **UK GDPR**	General Data Protection Regulation (EU) 2016/679, as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and section 205(4) of the Data Protection Act 2018.

4. Technical Requirements for Data Protection and Privacy

4.1 These Technical Requirements cover the implementation of the Code, but there are additional Technical Requirements for Data Protection and Privacy as set out in ACCS 2:2021 and applied as set out in this section for all Scheme Clients for certification of Age Appropriate Design of Information Society Services.

Note 1: In some cases, the context of the requirements in ACCS 2:2021 relate more specifically to age check providers and other clients under the Scheme. These will need to be interpreted as appropriate for the context of age appropriate design.

Note 2: To avoid unnecessary duplication in this document, the following requirements are set out in ACCS 2:2021

Leadership and Oversight of Data Protection Responsibilities

4.2 Top Management of scheme clients shall:

a) make and publish an Age Appropriate Design Policy Statement setting out a commitment to securing the best interests of the child in the Scheme Client's approach to the provision of its information society services;
b) on a regular basis (as a minimum annually) consider, approve, update and record its Data Protection Management System (as set out in ACCS 2; s.4.1.2) in the context of implementation of the Code;
c) be accountable for decisions made about data protection (as set out in ACCS 2; s.4.1.3 and further as set out in s. 4.4 below);
d) maintain an open and honest approach to data processing (as set out in ACCS 2; s.4.1.3)
e) comply with all transparency obligations (as set out in ACCS 2; s.4.1.3);
f) be responsible for ensuring that the Scheme Client have determined and documented the lawful basis of processing data for their information society service prior to commencing any processing of that data (as set out in ACCS 2; s.4.1.4).

Note 1: In addition to the general requirements about accountability set out in ACCS 2:2021, Scheme Clients shall implement an accountability programme to effectively address the standards in these technical requirements and the Code. This can be tailored to the size and resources of the Scheme Client and the risks to children inherent in the online service.

4.3 The Accountability Programme shall be driven by the Data Protection Officer, if one has been appointed, and overseen by senior management at Board level if the Scheme Client is structured in this way. For smaller businesses which may not have such formal structures, it is still important to make sure that children's privacy is understood by key personnel and is seen as an important business priority and key accountability measure.

4.4 Scheme Clients shall assess and revise the Accountability Programme on an ongoing basis, building in changes to reflect the changing environment of children's privacy.

4.5 Scheme Clients shall report against these technical requirements in any internal or external accountability reports, introducing KPIs (key performance indicators) on children's privacy to support this as appropriate.

Note 1: Scheme Clients may find the Information Commissioner's Accountability Framework a useful guide for implementing appropriate requirements under this section.

Data Protection Management Systems

4.6 Scheme Clients shall establish, document, implement and maintain appropriate data protection policies which state its commitment to deliver information society services likely to be accessed by children and involving personal data processing in compliance with UK GDPR, the Children's Code and its requirements in relation to these technical requirements.

4.7 The minimum requirements for data protection management system are set out in:

a) ACCS 2; s.4.3.3 (content of data protection management system);
b) ACCS 2; s.4.3.4 (management of documented information);
c) ACCS 2, s.4.3.5 – s.4.3.7 (records of processing activities);
d) ACCS 2; s.4.3.8 – s.4.3.9 (data retention policies); and
e) ACCS 2; s.4.3.10 – s.4.3.13 (internal audit).

Note 1: References in the sections of ACCS 2 listed above to the 'Target of Evaluation' should be read as references to the 'Target of Evaluation' in ss. 1.12 – 1.17 of these technical requirements.

Information Security and Risk Management

4.8 Scheme Clients shall establish, implement, maintain and continually improve a set of policies and procedures (Information Security Management System), which ensure the confidentiality, integrity and availability of systems and services, including the physical and cyber security of data covering the whole life cycle of the data in the context of providing information society services likely to be accessed by children.

4.9 The minimum requirements for information security and risk management are set out in:

a) ACCS 2; s.4.4.2 (security of personal data),

b) ACCS 2; s.4.4.3 & s.4.4.5 (risk assessment),
c) ACCS 2; s.4.4.4 (security measures),
d) ACCS 2; s.4.4.6 (cyber security),
e) ACCS 2; s.4.4.7 (annual review),
f) ACCS 2; s.4.4.8 (access restoration),
g) ACCS 2; s.4.4.9 (intervening in data processing),
h) ACCS 2; s.4.4.10 (encryption), and
i) ACCS 2; s.4.4.11 (penetration testing).

4.10 In considering the publication about any aspects of the Information Security Management System for users, particularly for children, Scheme Clients shall comply with the requirements for age appropriate transparency set out in s.5.4 of these technical requirements.

Data Protection Personnel & Training

4.11 Scheme Clients shall:

a) Appoint a Data Protection Officer and assign the responsibilities for that Officer as set out in the requirements in ACCS 2; s.4.5;
b) If a Data Protection Officer is not required by ACCS 2; s.4.5, appoint a person of sufficient seniority to provide advice on data protection and age appropriate design matters;
c) Implement a programme of training and education for personnel having access to personal data as set out in the requirements in ACCS 2; s.4.7;
d) Take responsibility for and manage the activities of any sub-contractors or sub-processors as set out in the requirements in ACCS 2; s.4.8.

General Data Processing Requirements

4.12 Scheme Clients shall:

a) Establish their lawful basis of processing, including the fairness of processing, taking into account the best interests of the child, in accordance with ACCS 2; s.5.2;
b) Have clearly identified the purpose or purposes for processing personal data, taking into account the best interests of the child, in accordance with ACCS 2; s.5.3;
c) Only collect personal data that they actually need for their specified purposes, taking into account the best interests of the child, in accordance with ACCS 2; s.5.4 and with particular reference to s.5.8 of these technical requirements;
d) Ensure that any personal data created by their processing is accurate and kept up to date, taking into account the best interests of the child, in accordance with ACCS 2; s.5.5;

e) Limit the use and storage of data in line with their own documented policies and retention schedules, taking into account the best interests of the child, in accordance with ACCS 2; s.5.6;
f) Respect general data subject rights, making particular allowance for the data subject potentially being a child, or having a person exercising data subject rights on behalf of a child, in accordance with ACCS 2; s.5.7 and with particular reference to s.5.15 of these technical requirements;
g) Handle special category data in accordance with ACCS 2; s.5.9 and with particular reference to s.5.3.4 of these technical requirements;
h) Only undertake international transfers of data, taking into account the best interests of the child, in accordance with ACCS 2; s.5.10; and
i) In addition to the requirements of s.5.9 of these technical requirements, apply the provisions of ACCS 2: s.5.11 regarding data sharing.

Note 1: The provisions of ACCS 2; s.4.6 (Data Protection Impact Assessments), s.5.8 (Transparency) are superseded by the relevant provision of the Age Appropriate Design provisions set out in s.5 of these technical requirements.

4.13 Scheme Clients shall establish, implement and maintain the process(es) needed to prepare for and respond to potential personal data breach situations, taking into account the best interests of the child, in accordance with ACCS 2; s.4.9

5. Requirements for Age Appropriate Design

5.1 Best interests of the child

5.1.1 Scheme Clients shall ensure that they identify the needs of children and work out how they can best support those needs in the design of their online service when processing their personal data. In doing this, Scheme Clients should take into account the age of the user.

5.1.2 Scheme Clients shall ensure that they implement specific actions, in their processing and use of personal data, to secure that they:

a) keep children safe from exploitation risks, including the risks of commercial or sexual exploitation and sexual abuse;
b) protect and support children's health and wellbeing;
c) protect and support children's physical, psychological and emotional development;
d) protect and support children's need to develop their own views and identity;
e) protect and support children's right to freedom of association and play;
f) support the needs of children with disabilities in line with the Scheme Client's obligations under the relevant equality legislation for England, Scotland, Wales and Northern Ireland;
g) recognise the role of parents in protecting and promoting the best interests of the child and support parents in this task; and
h) recognise the evolving capacity of the child to form their own view, and give due weight to that view.

Note 1: Taking account of the best interests of the child does not mean that Scheme Clients cannot pursue their own commercial or other interests. Those commercial interests may not be incompatible with the best interests of the child, but Scheme Clients need to account for the best interests of the child as a primary consideration where any conflict arises.

5.1.3 The Scheme Client's actions under 5.1.1 shall be documented and kept under regular review at intervals not exceeding 12 months.

5.2 Data Protection Impact Assessments

5.2.1 Scheme Clients shall ensure that they undertake a Data Protection Impact Assessment (DPIA) prior to commencing data processing.

5.2.2 The DPIA shall have a particular focus on the specific rights of and risks to children using the Scheme Client's service that arise from its data processing.

5.2.3 The DPIA shall also assess and document compliance with these technical requirements, including ensuring that the requirements are built in as additional elements into each stage of the DPIA, not bolt them on the end.

5.2.4 Scheme Clients shall embed a DPIA into the design of any new online service that is likely to be accessed by children. Scheme Clients shall also do a DPIA if they are planning to make any significant changes to the processing operations of an existing online service likely to be accessed by children.

Note 1: An external change to the wider context of the online service may also prompt a review of the DPIA. For example, if a new security flaw is identified, or a new public concern is raised over specific features of the online service or particular risks to children.

5.2.5 The DPIA shall be completed before the service is launched, and ensure the outcomes can influence the design of the information society service.

Note 1: Scheme Clients should not treat a DPIA as a rubber stamp or tick-box exercise at the end of the design process.

5.2.6 The DPIA shall describe the nature, scope, context and purposes of the processing. In particular, it shall include:

a) whether the service is designed for children;
b) if not, whether children are nevertheless likely to access the service;
c) the age range of those children;
d) the plans, if any, for parental controls;
e) the plans, if any, for establishing the age of their individual users;
f) the intended benefits for children;
g) the commercial interests (of the Scheme Client or third parties) that have been taken into account;
h) any profiling or automated decision-making involved;
i) any geolocation elements;

j) the use of any nudge techniques;
k) any processing of special category data;
l) any processing of inferred data;
m) any current issues of public concern over online risks to children;
n) any relevant industry standards or codes of practice;
o) responsibilities under the applicable equality legislation for England, Scotland, Wales and Northern Ireland; and
p) any relevant guidance or research on the development needs, wellbeing or capacity of children in the relevant age range.

5.2.7 Scheme Clients shall seek and document the views of children and parents (or their representatives), and take them into account in their design to the extent appropriate given the size of the Scheme Client, resources and the risks identified.

Note 1: Larger Scheme Clients should do some form of consultation in most cases. For example, they could choose to get feedback from existing users, carry out a general public consultation, conduct market research, conduct user testing, or contact relevant children's rights groups for their views. This should include feedback on the child's ability to understand the ways their data is used and the information provided.

Note 2: The 'representatives' of children and parents could include interest groups, civil society organisations, charities and campaign groups, in addition to representatives of individual children.

5.2.8 A Scheme Client that establishes that it is not possible to do any form of consultation, or it is unnecessary or wholly disproportionate, shall record that decision in the DPIA, and be prepared to justify it to the Auditor.

5.2.9 Scheme Clients shall seek and review independent advice from experts in children's rights and developmental needs as part of this stage. This is especially important for services which:

a) are specifically designed for children;
b) are designed for general use but known to be widely used by children (such as games or social media sites); or
c) use children's data in novel or unanticipated ways.

5.2.10 Scheme Clients shall ensure that they can explain why their processing is necessary and proportionate for the online service. This shall include information about how they meet the technical requirements for data protection and privacy (ACCS 2:2020), including:

a) the lawful basis for processing (see ACCS 2:2020, 5.2);
b) the conditions for processing any special category data;
c) the measures to ensure accuracy, avoid bias and explain use of AI; and

d) the specific details of the technological security measures (e.g. hashing or encryption standards).

5.2.11 Scheme Clients shall identify the potential impact on children and any harm or damage the data processing may cause – whether physical, emotional, developmental or material. Scheme Clients shall also specifically identify whether the processing could cause, permit or contribute to the risk of:

a) physical harm;
b) online grooming or other sexual exploitation;
c) social anxiety, self-esteem issues, bullying or peer pressure;
d) access to harmful or inappropriate content;
e) misinformation or undue restriction on information;
f) encouraging excessive risk-taking or unhealthy behaviour;
g) undermining parental authority or responsibility;
h) loss of autonomy or rights (including control over data);
i) compulsive use or attention deficit disorders;
j) excessive screen time;
k) interrupted or inadequate sleep patterns;
l) economic exploitation or unfair commercial pressure; or
m) any other significant economic, social or developmental disadvantage.

Note 1: Scheme Clients should bear in mind children's needs and maturity can differ according to their age and development stage.

5.2.12 To assess the level of risk, Scheme Clients shall identify both the likelihood and the severity of any impact on children. High risk could result from either a high probability of some harm, or a lower possibility of serious harm. Scheme Clients should bear in mind that some children can be less resilient than others, so they should always take a precautionary approach to assessing the potential severity of harm. Scheme Clients may find that there is a high risk for some age ranges, even if the risk for other age ranges is lower.

5.2.13 Scheme Clients shall make changes to their service to reduce or avoid each of the risks that have been identified.

5.2.14 Scheme Clients shall identify measures that do not rely on children's ability or willingness to engage with their privacy information.

5.2.15 Scheme Clients shall seek and record the independent advice on the outcome of the DPIA before making any final decisions of either:

(a) The Data Protection Officer, where the Scheme Client employs a DPO;

(b) A senior person with responsibility for data protection compliance, where a DPO is not employed by the Scheme Client;
(c) A third party advisor or consultant or suitably qualified legal professional.

5.2.16 Scheme Clients shall record any additional measures they plan to take, and integrate them into the design of the service. In certain circumstances set out in Article 36 of UK GDPR, Scheme Clients shall be required to consult with the ICO where the DPIA for high risk data processing cannot be mitigated.

5.2.17 The DPIA shall be published on the Scheme Client's website. Sensitive information in the DPIA may be redacted in the published version.

5.3 Age appropriate application

5.3.1 Scheme Clients shall ensure that they conduct a risk assessment of the risks to children that arise from the processing of their personal data, which shall take into account:

a) the types of data collected;
b) the volume of data;
c) the intrusiveness of any profiling;
d) whether decision making or other actions follow from profiling; and
e) whether the data is being shared with third parties.

Note 1: The risk assessment may form part of the Data Protection Impact Assessment.

5.3.2 Scheme Clients shall take action to understand how well they know their users including assessing and documenting their levels of certainty that an individual user is an adult or a child and their levels of confidence about the age range their individual child users fall into.

5.3.3 Scheme Clients shall ensure that the level of certainty they have about the age of their individual users is appropriate to the risks that arise from the data processing. If it is, then Scheme Clients can apply the rest of these technical requirements to child users only. If it is not, then Scheme Clients shall ensure that they implement technical and organisational measures to either:

a) reduce the data risks inherent in the online service;
b) put additional measures in place to increase the level of age confidence; or
c) apply these technical requirements to all users of their service (regardless of whether they have self-declared as an adult or a child).

5.3.4 Scheme Clients shall have used an appropriate method of gaining age assurance that gives the required level of assurance based on the service being accessed:

a) Self-declaration – This is where a user simply states their age but does not provide any evidence to confirm it. It may be suitable for low risk processing or when used in conjunction with other techniques. Even if Scheme Clients prefer to apply these

technical requirements to all users, self-declaration of age can provide a useful starting point when providing privacy information and age appropriate explanations of processing.

b) Artificial intelligence – It may be possible to make an estimate of a user's age by using artificial intelligence to analyse the way in which the user interacts with their service. Such mechanisms shall comply with ACCS 1 - Technical Requirements for Age Estimation Technologies and the specific requirements for the processing of special category data set out in ACCS 2; s.5.9. Similarly, this type of profiling can check that the way a user interacts with the service is consistent with their self-declared age. This technique can typically provide a greater level of certainty about the age of users with increased use of the service. If Scheme Clients choose to use this technique then they shall:
    a. notify users that they are going to do this upfront;
    b. only collect the minimum amount of personal data that they need for this purpose; and
    c. not use any personal data collected for this purpose for other purposes.

c) Third party age verification services – Scheme Clients may use a third party service to provide them with an assurance of the age of their users. Such mechanisms shall comply with PAS 1296:2018 Code of Practice for Online Age Check Services. Such services typically work on an 'attribute' system, where the Scheme Client requests confirmation of a particular user attribute (in this case age or age range) and the service provides a 'yes' or 'no' answer. Scheme Clients shall notify the user of the identity of the age check service used for this purpose.

d) Account holder confirmation – Scheme Clients may be able to rely upon confirmation of user age from an existing account holder who they know to be an adult. Such mechanisms shall comply with BS 8626:2020 Code of Practice for Online User Identification Systems. For example, the provision of a logged-in or subscription based service may allow the main (confirmed adult) account holder to set up child profiles, restrict further access with a password or PIN, or simply confirm the age range of additional account users.

e) Technical measures – Scheme Clients may implement technical measures which discourage false declarations of age, or identify and close under age accounts, which may be useful to support or strengthen self-declaration mechanisms. Examples include neutral presentation of age declaration screens (rather than nudging towards the selection of certain ages), or preventing users from immediately resubmitting a new age if they are denied access to the service when they first self-declare their age.

f) Hard identifiers – Scheme Clients can confirm age using solutions which link back to formal identify documents or 'hard identifiers' such as a passport. Such mechanisms shall comply with PAS 1296:2018 Code of Practice for Online Age Check Services.

Note 1: *Scheme Clients should avoid giving users no choice but to provide hard identifiers unless the risks inherent in the processing really warrant such an approach. This is because some children do not have access to formal identity documents and may have limited parental support, making it*

difficult for them to access age verified services at all, even if they are age appropriate. Requiring hard identifiers may also have a disproportionate impact on the privacy of adults.

5.3.5 Scheme Clients shall consider the needs of disabled children in line with any obligations that the Scheme Client has under the relevant equality legislation for England, Wales, Scotland and Northern Ireland.

5.3.6 Scheme Clients shall consider the needs of different age ranges and developmental stages of children in the design and deployment of their services.

5.4 Transparency

5.4.1 Scheme Clients shall ensure that the privacy information set out in Articles 13 and 14 is provided in a clear and prominent place on their online service.

5.4.2 Scheme Clients shall make this information easy to find and accessible for children and parents who seek out privacy information.

Note 1: In addition to the requirements for privacy information, Scheme Clients should also provide 'bite-sized' explanations at the point at which use of personal data is activated. This is sometimes referred to as a 'just in time notice'. Depending on the age of the child and the risks inherent in the processing, Scheme Clients should also prompt them to speak to an adult before they activate any new use of their data, and not to proceed if they are uncertain.

5.4.3 Scheme Clients shall identify any other points in their user journey when it could be appropriate to provide bite-sized explanations to aid the child's understanding of how their personal data is being used and implement those changes.

5.4.4 The Scheme Client's terms and conditions, policies and community standards shall be clear and accessible.

Note 1: If Scheme Clients draft terms and conditions in order to make them legally robust, then they can also provide child-friendly explanations to sit alongside the legal drafting (see further s.5.4.7).

5.4.5 The Scheme Client's information provided shall be accurate and shall not promise protections or standards that are not routinely upheld.

5.4.6 Scheme Clients shall present all privacy information in a way that is likely to appeal to the age of the child who is accessing the online service.

Note 1: This may include using diagrams, cartoons, graphics, video and audio content, and gamified or interactive content that can attract and interest children, rather than relying solely on written communications.

Note 2: Scheme Clients may use tools such as privacy dashboards, layered information, icons and symbols to aid children's understanding and to present the information in a child-friendly way. Scheme Clients should consider the modality of the service, and take into account user interaction patterns that do not take place in screen-based environments, as appropriate.

5.4.7 Once Scheme Clients have identified the likely age groups of the users of their online services they shall:

a) when addressing children aged 0 – 5 (pre-literacy & early literacy), ensure that they provide audio or video prompts telling them to leave high privacy default settings as they are or get help from a parent or trusted adult if they try and change any. The full privacy information as required by Articles 13 & 14 of the UK GDPR shall be in a format suitable for parents.

b) when addressing children aged 6 – 9 (core primary school years), ensure that they provide cartoon, video or audio materials to sit alongside parental resources. These shall explain the basic concepts of online privacy within the service, the privacy settings offered, who can see what, their information rights, how to be in control of their own information, and respecting other people's privacy.

c) when addressing children aged 6 – 9 (core primary school years), explain the basics of the service and how it works, what children can expect from the Scheme Client and what the Scheme Client expects from them. The full privacy information as required by Articles 13 & 14 of the UK GDPR shall be in a format suitable for parents.

d) when addressing children aged 6 – 9,provide resources for parents to use with their children to explain privacy concepts and risks within the service and provide resources for parents to use with their children to explain the basics of the service and how it works, what they can expect from the Scheme Client and what the Scheme Client expects from them.

e) when addressing children aged 6 – 9, ensure that they provide cartoon, video or audio materials to explain to the children what can happen to their information and any associated risks, and to leave high privacy default settings as they are or get help from a parent or trusted adult if they try and change any.

f) children aged 10 – 17 (Transition years through to approaching adulthood), provide full privacy information as required by Articles 13 & 14 of the UK GDPR in a format suitable for. In addition, Scheme Clients shall provide full privacy information as required by Articles 13 & 14 of the UK GDPR in a format suitable for parents.

g) children aged 10 – 17 (Transition years through to approaching adulthood), allow them to choose between written and video/audio options and give these children the choice to upscale or downscale the information they see (to materials developed for an older or younger age group) depending on their individual needs.

h) children aged 10 – 17 (Transition years through to approaching adulthood), ensure that they provide written and video/audio materials to explain what can happen to their information and any associated risks, and to leave high privacy default settings as they are or get help from a parent or trusted adult if they try and change any.

5.4.8 Dashboards shall be displayed in a way that clearly identifies and differentiates between processing that is essential to the provision of the service and non-essential or optional processing that the child can choose whether to activate.

5.4.9 Scheme Clients shall ensure that they identify how to tailor the content and presentation of the information provided depending on the age of the user. For younger children, with more limited levels of understanding, Scheme Clients may need to provide less detailed information for the child themselves and rely more on parental involvement and understanding.

5.4.10 Scheme Clients shall not use simplification with the aim of hiding what they are doing with the child's personal data.

5.4.11 Scheme Clients shall provide detailed information for parents, to sit alongside information directed at children.

5.4.12 Scheme Clients shall make all versions of resources (including versions for parents) easily accessible and incorporate mechanisms to allow children or parents to choose which version they see, or to down-scale or up-scale the information depending on their individual level of understanding.

Note 1: Depending on the size of the Scheme Client, the number of users and the assessment of risk, Scheme Clients may decide to carry out user testing to make sure that the information provided is sufficiently clear and accessible for the age range in question. They should document the results of any user testing in the DPIA to support their final conclusions and justify the presentation and content of their final resources. If Scheme Clients decide that user testing is not warranted, then they should document the reasons why in their DPIA.

5.4.13 Scheme Clients shall ensure that they identify and address any additional responsibilities they have under the applicable equality legislation for England, Scotland, Wales and Northern Ireland.

5.5 Detrimental use of data

5.5.1 Scheme Clients shall ensure that they are aware of and document the relevant standards and codes of practice within their industry or sector, and any provisions within them that relate to children.

Note 1: Relevant standards include those issued by the Advertising Standards Authority, OFCOM, Portman Group Codes, Betting and Gaming Council Codes, Competition and Markets Authority or any other appropriate industry standards, codes or best practice.

5.5.2 Scheme Clients shall not process children's personal data in ways that are obviously detrimental or run counter to such advice.

5.5.3 Scheme Clients should take account of any age specific advice to tailor their online service to the age of the child.

5.5.4 Scheme Clients shall take particular care when profiling children, including making inferences based on their personal data, or processing geo-location data.

5.5.5 Scheme Clients shall not process children's personal data in ways that have been formally identified as requiring further research or evidence to establish whether or not they are detrimental to the health and wellbeing of children.

5.5.6 Scheme Clients shall identify and address, through appropriate risk assessment and mitigation, any aspects of their online services that risks:

a) physical, mental or moral harm to children;
b) exploiting children's credulity and applying unfair pressure, including aggressive commercial practices;
c) direct exhortation of children and undermining parental authority;
d) prohibited marketing of certain products, such as high fat, salt and sugar food and drinks and alcohol, to children, and general guidance on transparency of paid-for content and product placement;
e) exposure to strategies used to extend user engagement, sometimes referred to as 'sticky' features, can include mechanisms such as reward loops, continuous scrolling, notifications and auto-play features which encourage users to continue playing a game, watching video content or otherwise staying online;
f) exposing the coverage of sexual and other offences in the UK involving under-18s;
g) exposing drugs, smoking, solvents and alcohol;
h) exposing violence and dangerous behaviour;
i) exposing offensive language;
j) exposing sexual material;
k) exposing nudity;
l) exposing exorcism, the occult and the paranormal; and
m) the involvement of people under 18 in broadcast programmes.

5.5.7 Scheme Clients shall not:

a) use features which use personal data to exploit human susceptibility to reward, anticipatory and pleasure seeking behaviours, or peer pressure;
b) use personal data in a way that incentivises children to stay engaged, such as offering children personalised in-game advantages (based upon the service's use of the individual user's personal data) in return for extended play;
c) present options to continue playing or otherwise engaging with the service neutrally by suggesting that children can lose out if they don't; and
d) use personal data to automatically extend use instead of requiring children to make an active choice about whether they want to spend their time in this way (data-driven autoplay features).

5.5.8 Scheme Clients shall introduce mechanisms such as pause buttons which allow children to take a break at any time without losing their progress in a game, or provide age appropriate content to support conscious choices about taking breaks.

5.6 Policies and community standards

5.6.1 Scheme Clients shall comply with their side of any requirements in their own policies and community standards.

Note 1: Particular attention is drawn to ACCS 2; s.5.2.3 regarding any deceptive or misleading statements made during the collection and processing of personal data. Processing otherwise than in accordance with their own policies and community standards can result in unfair processing.

5.6.2 As required by s. 4.12 (b) & (c) of these technical requirements, Scheme Clients shall comply with the purpose limitation requirements of ACCS 2; ss. 5.3 & 5.4, taking into account the best interests of the child.

5.6.3 Scheme Clients shall implement and enforce any of their rules which govern the behaviour of users of their service. This includes any promises to actively monitor user behaviour, offer real time, automated, or human moderation of 'chat' functions.

5.6.4 Scheme Clients that rely on 'back end' processes such as user reporting to identify behaviour which breaches their policies, shall have made that clear in their policies or community standards. This approach shall be reasonable given the risks to children of different ages inherent in the online service. If the risks are high then 'light touch' or 'back end only' processes to uphold their standards shall not be sufficient.

5.6.5 Scheme Clients shall implement and enforce any of their rules for users about the content or other aspects of the online service. So if Scheme Clients say that the content of the online service is suitable for children within a certain age range then they shall have systems to ensure that it is. If they say that they do not tolerate bullying, then they shall have adequate mechanisms to swiftly and effectively deal with bullying incidents.

5.6.6 Scheme Clients that have different policies depending on the age of the users shall take account of the age of the child when upholding their policies.

5.7 Default settings

5.7.1 Scheme Clients shall set the privacy settings by default to 'high privacy' and ensure that children's personal data is only visible or accessible to other users of the service if the child amends their settings to allow this. A Scheme Client may demonstrate that there is a compelling reason for a different default setting taking into account the best interests of the child.

5.7.2 Scheme Clients shall ensure that unless the setting is changed, their own use of the children's personal data is limited to use that is essential to the provision of the service. Any optional uses of personal data, including any uses designed to personalise the service, shall be individually selected and activated by the child.

5.7.3 Any settings which allow third parties to use personal data shall be activated by the child.

5.7.4 Scheme Clients shall implement further measures when a child attempts to change a default privacy setting.

Note 1: This could include further age assurance measures. Scheme Clients should use their DPIA to help them assess risks and identify suitable mitigation.

5.7.5 Scheme Clients shall allow users the option to change settings permanently or just for the current user session.

5.7.6 Scheme Clients shall be able to demonstrate that they have made it easy for a child to maintain or revert to high privacy settings if they wish to do so.

5.7.7 Scheme Clients that update or upgrade software shall retain user choices. If it is not possible to do this (e.g. if a new aspect or feature to the product or service is introduced, or an existing feature is significantly changed so the previous privacy settings are no longer relevant), the new setting shall be to high privacy by default.

5.7.8 Where Scheme Clients offer multi-user profiles, they shall allow for different user choices on multi-user devices. If Scheme Clients provide an online service that allows multiple users to access the service from one device, then they shall allow users to set up their own profiles with their own individual privacy settings. This means that children do not have to share an adult's privacy settings when they share the same device.

Note 1: Profiles could be accessed via screen-based options or using voice recognition technology for voice activated online services.

5.7.9 Scheme Clients shall provide clear information for the person who sets up or registers the device, alerting them to the potential for the personal data of multiple users to be collected.

5.7.10 Where a Scheme Client has settings off by default and the user has to activate the processing by changing the default setting, then Scheme Clients shall provide mechanisms for obtaining consent to the processing under the UK GDPR, such as using privacy settings as part of their mechanism. However, they shall also meet the requirements of Article 7 of the UK GDPR (conditions for consent) and the age verification and parental responsibility verification requirements of Article 8 (under UK GDPR, these only allow children of 13 or over to provide their own consent), so they may not be enough on their own.

Note 1: Scheme Clients may also use privacy settings to give children choice over how their personal data is used if the Scheme Client relies on other lawful bases for processing (such as legitimate interests) which do not have any formal consent requirements.

5.8 Data minimisation

5.8.1 Scheme Clients shall only collect and process personal data that is adequate, relevant and necessary for the purposes for which they are processed.

5.8.2 Scheme Clients shall give children choice over which elements of the service they wish to use and therefore how much personal data they need to provide.

5.8.3 Scheme Clients shall not 'bundle in' the collection of children's personal data in order to provide enhancements with the collection of personal data needed to provide the core service. Neither shall Scheme Clients bundle together several additional elements or enhancements of the service. Scheme Clients shall give children a choice as to whether they wish their personal data to be used for each additional purpose or service enhancement.

5.8.4 Scheme Clients shall only collect personal data when the child is actively and knowingly using that element of the service.

5.9 Data sharing

5.9.1 Scheme Clients shall ensure that the best interests of the child are a primary consideration whenever contemplating sharing children's personal data.

Note 1: There are further requirements relating to data sharing set out in s.5.11 of ACCS 2 and Scheme Clients should also apply the provisions of the Data Sharing Code.

5.9.2 Scheme Clients shall not share personal data if it can reasonably be foreseen that doing so can result in third parties using children's personal data in ways that have been shown to be detrimental to their wellbeing.

5.9.3 Scheme Clients shall obtain assurances from whoever they share the personal data with about the restriction on use of the data and protecting the child's wellbeing, and should only share the child's data if there is a compelling reason to do so.

Note 1: One clear example of a compelling reason is data sharing for safeguarding purposes, preventing child sexual exploitation and abuse online, or for the purposes of preventing or detecting crimes against children such as online grooming.

Note 2: An example that is unlikely to amount to a compelling reason for data sharing is selling on children's personal data for commercial re-use.

5.9.4 Scheme Clients shall undertake due diligence checks on third parties as to the adequacy of their data protection practices and any further distribution of the data.

5.9.5 Any default settings related to data sharing shall specify the purpose of the sharing and who the data can be shared with.

5.9.6 Any settings which allow general or unlimited sharing shall not be permitted.

5.9.7 Scheme Clients shall identify the specific issues and risks of data sharing at each individual stage of their DPIA.

5.10 Geolocation

5.10.1 Scheme Clients shall ensure that geolocation options are off by default.

5.10.2 Children shall only be required to change the default geolocation setting if they want to activate the geolocation functions. The exception to this is if the Scheme Client can demonstrate a compelling reason for a geolocation option to be switched on by default, taking into account the best interests of the child. For example they may be able to argue that metrics needed to measure demand for regional services may be sufficiently un-intrusive to be warranted (taking into account the best interests of the child).

5.10.3 Scheme Clients shall identify at what level of granularity the location needs to be tracked to provide each element of the service.

5.10.4 Scheme Clients shall not collect more granular detail than is actually needed, and shall offer different settings for different levels of service if appropriate.

5.10.5 Scheme Clients shall provide information at the point of sign-up on location tracking, and each time the service is accessed, that alerts the child to the use of geolocation data and prompts them to discuss this with a trusted adult if they do not understand what it means.

5.10.6 Scheme Clients shall provide a clear indication of when the child's location is and is not being tracked (e.g. by use of a clear symbol visible to the user), and ensure that location tracking cannot be left on inadvertently or by mistake.

5.10.7 Scheme Clients shall ensure that they revert settings which make the child's location visible to others to 'off' after each use. The exception to this is if the Scheme Client can demonstrate that they have a compelling reason to do otherwise, taking into account the best interests of the child.

5.11 Parental controls

5.11.1 Scheme Clients shall ensure that they make it clear to the child if parental controls are in place and if they are being tracked or monitored.

Note 1: Parental monitoring impacts upon the privacy of children. This may or may not be detrimental to the best interests of the child. The expectation of privacy for children is likely to increase as they get older.

5.11.2 If the online service allows parental monitoring or tracking of a child, Scheme Clients shall provide age appropriate resources to explain the service to the child so that they are aware that their activity is being monitored by their parents or their location tracked.

5.11.3 Scheme Clients shall provide a clear and obvious sign for the child (such as an illuminated icon) which lets them know when monitoring or tracking is active.

5.11.4 Scheme Clients shall provide parents with information about the child's right to privacy under the UNCRC and resources to support age appropriate discussion between parent and child.

5.11.5 Scheme Clients shall identify and address any additional responsibilities they may have under the applicable equality legislation for England, Scotland, Wales and Northern Ireland.

5.11.6 Scheme Clients shall ensure that they provide audio or video prompts (or for older children written materials) telling children to explain that their parent is being told what they do online to help keep them safe.

5.11.7 Scheme Clients shall provide materials for parents explaining the child's right to privacy under the UNCRC and how their expectations about this are likely to increase as they get older. This can include resources to help parents explain the service to their child and discuss privacy with them and resources suitable for older children to use independently which explain the service and discusses privacy rights.

5.12 Profiling

5.12.1 Scheme Clients shall ensure that they differentiate between different types of profiling for different purposes.

Note 1: Catch-all purposes, such as 'providing a personalised service' are not specific enough.

5.12.2 Where it is appropriate to offer privacy settings, then the Scheme Client shall offer separate settings for each different type of profiling.

5.12.3 Scheme Clients shall not bundle different types of profiling together under one privacy setting, or bundle in profiling with processing for other purposes.

5.12.4 Scheme Clients shall ensure that features that rely on profiling are switched off by default (unless there is a compelling reason to do otherwise, taking account of the best interests of the child).

Note 1: Scheme Clients may have a compelling argument that their need to switch profiling options for other purposes on by default. For example, it may be appropriate for profiling for the purposes of ensuring that a service is accessible to a disabled child (e.g. identifying that a child has an ongoing need for a subtitled, signed or other supported service) to be switched on by default.

Note 2: Scheme Clients may be able to demonstrate that profiling for the purposes of informing news content feeds should be allowed by default, in order to recognise the rights of children to access information. Although Scheme Clients may still need consent to set the cookies that support the profiling.

Note 3: This is more likely to be the case if the Scheme Client can demonstrate that they conform with existing regulatory codes of practice which govern media content and practices (such as The Editors' Code of Practice) and have editorial control over the content that children can be shown as a result of the profiling. It is unlikely to apply if they do not have such editorial control or adhere to other regulatory controls.

5.12.5 Any Scheme Client that undertakes profiling for the purposes of behavioural advertising, which is facilitated by cookies, shall ensure that valid consent is obtained by an 'opt in' option. Scheme Clients shall not allow such profiling 'by default'.

Note 1: Scheme Clients also need to comply with the Article 8 UK GDPR requirements for parental consent if the child is under the age of 13 (under UK GDPR).

5.12.6 Scheme Clients shall provide appropriate interventions at the point at which any profiling is activated, including providing age appropriate information about what can happen to the child's personal data and any risks inherent in that processing.

5.12.7 Scheme Clients shall provide age appropriate prompts to seek assistance from an adult and not to activate the profiling if they are uncertain or do not understand.

5.12.8 Where profiling is switched on, Scheme Clients shall ensure that they put appropriate measures in place to safeguard the child (in particular from inappropriate content) and ensure the profiling does not result in any harm to the child.

Note 1: In practice this means that if the Scheme Client profiles children (using their personal data) in order to suggest content to them, then they need suitable measures in place to make sure that children are not served content which is detrimental to their physical or mental health or wellbeing, taking into account their age. As covered in the section of this code on DPIAs, testing the algorithms should assist in assessing the effectiveness of the measures put in place.

Note 2: Such measures could include contextual tagging, robust reporting procedures, and elements of human moderation. It could also include editorial controls over the content displayed, including adherence to codes of conduct or other regulatory provisions (such as compliance with The Editors' Code of Practice, or the Ofcom Broadcasting Code). Children have an important right to access information from the media, and the societal and developmental benefits of children being able to engage in current affairs and the world around them. Adherence to editorial or broadcasting codes of conduct can negate the need for providers of online news to take any additional steps in relation to news content for children.

5.12.9 Scheme Clients that are using children's personal data to automatically recommend content to them based on their past usage/browsing history shall be responsible for the recommendations made. This applies even if the content itself is user generated.

Note 1: In data protection terms, Scheme Clients have a greater responsibility in this situation than if the child were to pro-actively search out such content themselves.

This is because it is the Scheme Client's processing of the personal data that serves the content to the child. Data protection law does not make the Scheme Client responsible for third party content but it does make them responsible for the content they serve to children who use their service, based on the use of their personal data.

5.12.10 Scheme Clients shall ensure that if the content they promote or the behaviours their system features encourage are obviously detrimental, or are recognised as harmful to the child in one context (e.g. marketing rules, film classification, advice from official Government sources such as Chief Medical Officers' advice, PEGI ratings), then they shall assume that the same type of content or behaviour is harmful in other contexts as well. Where evidence is inconclusive, Scheme Clients should apply the same precautionary principle.

5.12.11 Scheme Clients shall take into account content or behaviours that may be detrimental to children's health and wellbeing (taking into account their age) including:

a) advertising or marketing content that is contrary to CAP guidelines on marketing to children;
b) film or on-demand television content that is classified as unsuitable for the age group concerned;
c) music content that is labelled as parental advisory or explicit;
d) pornography or other adult or violent content;
e) user generated content (content that is posted by other internet users) that is obviously detrimental to children's wellbeing or is formally recognised as such (e.g. pro-suicide, pro-self harm, pro-anorexia content, content depicting or advocating risky or dangerous behaviour by children); and
f) strategies used to extend user engagement, such as timed notifications that respond to inactivity.

5.12.12 Scheme Clients that are not able to put suitable measures in place to safeguard children from harmful content or behaviour shall not profile children for the purposes of recommending online content. In these circumstances Scheme Clients shall ensure that children cannot change any privacy settings which allow this type of profiling.

5.12.13 Scheme Clients shall take account of other rules on restricting access to content in order to ensure that they do not use children's personal data in ways that have been shown to be detrimental to their wellbeing.

Note 1: The CAP code requires that when advertising is targeted through the use of personal data, advertisers shall show that they have taken reasonable steps to reduce the likelihood of those who are, or are likely to be, in a protected age category being exposed to age-restricted marketing content.

Note 2: The Ofcom On Demand Programme Service Rules require providers of 'on demand' content to only make certain content ('specially restricted material') available, if it can do so in a way that ensures that those under the age of 18 should not normally be able to see or hear it.

Note 3: The Communications Act 2003 (as amended by various Audio Visual Media Services Regulations) requires 'video sharing platform services' to use proportionate measures in relation to how they organise the content they share, to protect minors from content which might impair their physical, mental or moral development.

5.12.14 Scheme Clients shall only allow children's personal data to be used to determine content feeds if they can put suitable measures in place to guard against them being served content that is detrimental to their health and wellbeing.

5.12.15 Scheme Clients shall not use personal data collected or generated for the purposes of protecting minors from content which might impair their physical, mental or moral development for commercial purposes such as direct marketing, profiling and behaviourally targeted advertising.

5.12.16 Scheme Clients shall provide users with clear and comprehensive information about the use of cookies and obtain prior consent for any that are 'non-essential'.

Note 1: If the child decides to access non-core services, then consent for the use of the cookie is not needed – as the child is specifically requesting to access part of the service and the cookie is strictly necessary for this purpose. Scheme Clients do however need a lawful basis for the underlying processing.

5.12.17 Scheme Clients shall identify and record a lawful basis for processing for any cookie that is essential to the provision of the core service. Consent is not an appropriate lawful basis where the processing is essential to the core service provided.

Note 1: If the cookie is essential to the provision of the Scheme Client's core service then it is likely that the underlying profiling that the cookie enables is too. In this circumstance providing a privacy setting which allows the child to control whether their personal data is used for this purpose won't be appropriate. The Scheme Client should identify a lawful basis (other than consent) for the underlying processing (profiling) and won't need consent for the cookie.

5.12.18 Scheme Clients may use cookies for profiling that intends to meet the implied age verification requirements of Article 8 of the UK GDPR or to age assure in order to properly apply the standards of this code. If they do, the purpose for the use of the cookies is regarded as essential for the service, as they need to do so to provide an age appropriate service and comply with the UK GDPR. Provided that the cookie in question is solely used for this purpose, and not for any other purpose, then the child does not need to consent to the cookie.

5.13 Nudge techniques

5.13.1 Scheme Clients shall not use nudge techniques to lead or encourage children to activate options that mean they give the Scheme Client more of their personal data, or turn off privacy protections.

5.13.2 Scheme Clients shall not exploit unconscious psychological processes to this end (such as associations between certain colours or imagery and positive outcomes, or human affirmation needs).

5.13.3 Scheme Clients shall not use nudge techniques that might lead children to lie about their age. For example pre-selecting an older age range for them, or not allowing them the option of selecting their true age range.

5.13.4 Taking into account the best interests of the child as a primary consideration, Scheme Clients shall ensure that their design supports the developmental needs of the age of their child users.

Note 1: Younger children, with limited levels of understanding and decision making skills, need more instruction based interventions, less explanation, unambiguous rules to follow and a greater level of parental support. Nudges towards high privacy options, wellbeing enhancing behaviours and parental controls and involvement should support these needs.

Note 2: As children get older the focus should gradually move to supporting them in developing conscious decision making skills, providing clear explanations of functionality, risks and consequences. They can benefit from more neutral interventions that require them to think things through. Parental support may still be required but should be presented as an option alongside signposting to other resources.

5.13.5 Where appropriate, Scheme Clients should nudge children in ways that support their health and wellbeing. For example, nudging them towards supportive resources or providing tools such as pause and save buttons.

Note 1: If Scheme Clients use personal data to support these features then they still need to make sure their processing is compliant (including having a lawful basis for processing and have provided clear privacy information), but subject to this it is likely that such processing can be fair.

5.13.6 Scheme Clients shall identify, document and address any additional responsibilities they may have under the applicable equality legislation for England, Scotland, Wales and Northern Ireland.

5.13.7 Scheme Clients shall provide design architecture which is high-privacy by default for children.

Note 1: If a change of default is attempted by younger children, Scheme Clients should nudge towards maintaining high privacy or towards parental or trusted adult involvement.

5.13.8 For younger children, Scheme Clients shall avoid explanations and instead present as rules to protect and help. They shall identify further interventions such as parental notifications, activation delays or disabling facility to change defaults without parental involvement, depending on the risks inherent in the processing.

Note 1: The Code provides a specific table that suggests specific measures for younger and older children, that Scheme Clients should apply in complying with this provision.

5.13.9 Scheme Clients shall nudge towards wellbeing enhancing behaviours (such as taking breaks) and provide tools to support wellbeing enhancing behaviours (such as mid-level pause and save features).

5.13.10 For older children, Scheme Clients shall provide simple explanations of functionality and inherent risk, but continue to present as rules to protect and help. They shall identify further interventions such as parental notifications, activation delays or disabling facility to change defaults without parental involvement, depending on the risks inherent in the processing.

5.13.11 For older children, Scheme Clients shall present options in ways that encourage conscious decision making.

Note 1: The Code provides a specific table that suggests specific measures for younger and older children, that Scheme Clients should apply in complying with this provision.

5.14 Connected toys and devices

5.14.1 Scheme Clients that provide a connected toy or device shall identify who is processing the personal data that it transmits via the network connection and what their data protection responsibilities are.

5.14.2 Scheme Clients that provide both the physical product and the online functionality that supports it, are solely responsible for ensuring compliant processing.

Note 1: If the Scheme Client outsources or 'buys in' the online functionality or 'connected' element of the device, then whoever provides this aspect of the overall product shall also have responsibilities. The extent of these can vary depending on whether they are a 'processor' acting only on behalf of the Scheme Client, or a 'controller' in their own right.

Note 2: However, Scheme Clients cannot absolve themselves of their data protection obligations by outsourcing the 'connected' element of the toy or device to someone else. If they provide a connected toy or device then they need to comply with the UK GDPR and follow these technical requirements, and make sure that any third parties they use to deliver their overall product do so too.

5.14.3 Scheme Clients shall ensure that the product incorporates adequate security measures to mitigate risks such as unauthorised access to data, or 'hacking' of the device in order to communicate with the child (e.g. taking over microphone capabilities) or track their location.

5.14.4 Scheme Clients that provide a connected device shall anticipate and provide for it to be used by multiple users of different ages and shall:

a) ensure that the service that they provide by default (the service that would be provided, for example, to occasional visitors to a household) is suitable for use by all children; and
b) provide user profile options for people who use the device regularly (e.g. household members and frequent visitors to a household) to support use by adults, or to tailor the service to the age of a particular child.

Note 1: This is particularly the case for devices such as home hub interactive speaker devices which are likely to be used by multiple household members, including children, and may also be used by visitors to the home. Similarly, interactive toys are often shared or may be used by several children at once when they play together.

5.14.5 Scheme Clients shall provide clear information indicating that the product processes personal data at the point of sale and prior to device set-up. Both the packaging of the physical product, and the product leaflet or instruction booklet (paper or digital) should carry a clear indication (such as an icon) that the product is 'connected' and processes users' personal data.

5.14.6 Scheme Clients shall allow potential purchasers to view the Scheme Client's privacy information, terms and conditions of use and other relevant information online without having to purchase and set up the device first, so that they can make an informed decision about whether or not to buy the device in the first place.

Note 1: Scheme Clients should also have a particular focus on the tools they provide to facilitate the set-up of the connected toy or device. This is a key opportunity for them to provide information about how the service works, how personal data is used and to explain the implications of this, especially if set-up is activated using a screen-based interface. If the child's ongoing use of the device is not screen-based this is particularly important as this may limit the ways in which Scheme Clients can convey information to the child on an ongoing basis.

5.14.7 Scheme Clients shall identify and address how the connected device operates and how best to communicate 'just in time' information to the child or their parent. This may include auto-play audio messages, only allowing default settings to be changed via use of a support app, or facilitating interactive auto-bot 'conversations' with the user.

5.14.8 Scheme Clients shall provide features that make it clear to the child or their parent when the device is collecting personal data. For example a light that switches on when the device is audio recording, filming or collecting personal data in another way.

5.14.9 If the device uses a stand-by or 'listening' mode (e.g. it listens out for the name the Scheme Client or the child has given to the device, or for another key word or phrase to be used, and activates data collection when that word or phrase is used), Scheme Clients shall provide a clear indication that listening mode is active.

5.14.10 Scheme Clients shall not collect personal data when the device is in listening mode.

5.14.11 Scheme Clients shall provide features which allow collection or listening modes to be easily switched off on the device itself (a 'connection off' button), or via online functionality options, so that the toy or device can be used as a non-connected device so far as this is practicable.

5.15 Online tools

5.15.1 Scheme Clients shall provide online tools that enable children to exercise their rights and report concerns to the Scheme Client.

Note 1: See ACCS 2, s.5.7 for additional requirements on data subject's rights, however, these technical requirements are intended to ensure that Scheme Clients develop age appropriate tools for children to exercise their rights and report concerns.

5.15.2 Scheme Clients shall make their online 'rights' tools prominent and easy for children to find.

5.15.3 Scheme Clients shall highlight the reporting tool (such as tools to report concerns, flag inappropriate conduct or behaviour) in their set up process and provide a clear and easily identifiable icon or other access mechanism in a prominent place on the screen display.

Note 1: If the online service includes a physical product, for example a connected toy or speaker, the Scheme Client can include the icon on their packaging, highlighting online reporting tools as a product feature, and find ways to highlight reporting tools in a prominent way even if the product is not screen-based.

5.15.4 Scheme Clients shall make their online tools age appropriate and easy to use.

5.15.5 Scheme Clients shall tailor their online tools to the age of the child in question.

5.15.6 Scheme Clients shall identify and address any additional responsibilities they may have under the applicable equality legislation for England, Scotland, Wales and Northern Ireland.

5.15.7 Scheme Clients shall provide icon(s), audio prompts or similar that even the youngest of children can recognise as meaning 'I'm not happy' or 'I need help'. If these buttons are pressed, or other prompts responded to, Scheme Clients shall provide video or audio material prompting the child to get help from a parent or trusted adult.

5.15.8 Scheme Clients shall provide online tools for safeguarding children suitable for use by parents, or for older children provide online tools that children could use either by themselves or with the help of an adult.

5.15.9 Scheme Clients shall provide icon(s), audio prompts or similar that older children can recognise as meaning 'I want to raise a concern', 'I want to access my information' or 'I need help'. If these buttons are pressed, or other prompts responded to, Scheme Clients shall direct the child to the online tools and prompt them to get help from a parent or other trusted resource if they need it.

5.15.10 Scheme Clients shall provide age appropriate tools to support the rights children have under the UK GDPR. For example:

a) a 'download all my data' tool to support the right of access, and right to data portability;
b) a 'delete all my data' or 'select data for deletion' tool to support the right to erasure;
c) a 'stop using my data' tool to support the rights to restrict or object to processing; and
d) a 'correction' tool to support the right to rectification.

5.15.11 Scheme Clients shall establish online tools that include ways for the child or their parent to track the progress of their complaint or request, and communicate with the Scheme Client about what is happening.

5.15.12 Scheme Clients shall provide information about their timescales for responding to requests from children to exercise their rights, and shall deal with all requests within the timescales set out at Article 12(3) of the UK GDPR.

5.15.13 Scheme Clients shall have mechanisms for children to indicate that they think their complaint or request is urgent and why, and the Scheme Clients shall actively identify any information they provide in this respect and prioritise accordingly.

5.12.14 Scheme Clients shall ensure that they have procedures in place to take swift action where information is provided indicating there is an ongoing safeguarding issue.

About ACCS

The Age Check Certification Scheme is an independent not-for-profit certification scheme for providers of age restricted goods, content or services. We check that age systems work. Our scheme, backed by the Northern Powerhouse Investment Fund, can be utilised to provide full conformity assessment in accordance with all aspects of age restricted sales. We offer a range of services, including Test Purchasing, which deploys our award-winning Android & iOS App, and boast a state-of-the-art Age Check Test Studio which enables the scientific examination of age check systems.

Internationally recognised Standards

Our scheme provides evidence that your age check practices meet international standards.

Highly qualified certification officers

Our locally sourced certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

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Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check
Certification Scheme

www.accscheme.com

An independent not-for-profit company registered in England and Wales (11493870) at Unit 321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL

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Age Check Certification Scheme

Standards and Technical Requirements

ACCS 4:2020

Technical Requirements for Age Check Systems

For the assessment of claims of conformity under PAS 1296:2018 Online age checking. Provision and use of online age check services. Code of Practice

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ACCS 4:2020

Technical Requirements for Age Check Systems

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Introduction

Age Check Systems are utilised by providers of age restricted goods, content or services to assess and make decisions about the age of customers. This can be through age determination (often called 'hard verification'), age categorisation or age estimation.

PAS 1296:2018 provides a code of practice for age check providers, age exchanges or relying parties undertaking age check processes. As a code of practice, it does not set requirements, but does provide for organisations to make claims of conformity including through independent 3rd party validation of age check systems. In order to do that, it is necessary for the conformity assessment body to set out the technical requirements that it will apply, using PAS 1296:2018 as a framework, to assess whether or not to issue a certificate of conformity.

The Scheme aims to achieve the following:

- To validate and certify tools to help prevent harm to children and nuisance caused by young people from access to age-restricted content, goods and services.
- To improve the quality, consistency and performance of age verification systems and procedures both online and offline.
- To provide consumers, purchasers, specifiers, regulators, law enforcement authorities, content providers, service providers and goods retailers with the assurance for them to identify suitable companies for conducting age verification.
- To help companies and individuals to demonstrate that their services or products meet an appropriate standard.
- To enable companies to demonstrate compliance with GDPR of processing operations by controllers and processors.
- To mitigate the risks of non-compliance with age-restricted content, goods or services legislation including mitigating the risks of:
    - Criminal or disciplinary sanctions
    - Civil or criminal action against the business and individual staff
    - Damage to reputation leading to a loss of business
    - Licensing action, conditions or restrictions imposed by Licensing Authorities

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1. Scope

The Age Check Certification Scheme (ACCS) Standards are applicable to scheme clients submitting age check systems for certification from ACCS and wish to have access to use of the ACCS certification mark as a mark of conformity for the technology.

This part of the ACCS Standards:

- establishes the definitions applicable to age check systems testing;
- identifies the target of evaluation for age check systems testing;
- establishes the requirements for age check systems to demonstrate conformity and be fit for deployment;

The suite of ACCS Standards are applied as applicable to the activities of clients certified by ACCS. This will be dependent on the scope of operations of the providers and the services that they provide.

These technical requirements are applicable to:

- Age Check Providers that verify age attributes on request by a third party on a transaction-by-transaction basis under a pre-arranged contractual relationship with the Age Check Provider
- Age Check Exchange Providers or Brokers that provide an online gateway for Age Check Providers and Relying Parties to access user asserted, permissioned and verified attributes
- Relying Parties (online or offline) that rely on results of an age check (either remotely or during a face-to-face encounter) to establish the age-related eligibility of an individual for the purposes of a transaction (such as sellers or providers of age restricted goods and services)

Age Check Providers will provide at least one of the following services:

- Age determination – an indication established that a citizen has a particular age stated to a specified level of confidence and by reference to information related to that citizen
- Age categorisation – an indication established that a citizen is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that citizen
- Age estimation – an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen (The Technical Requirements for Age Estimation Technologies are set out in ACCS 1)

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2. Normative References

Legal Provisions

National and International Standards

PAS 1296:2018 - Online age checking. Provision and use of online age check services. Code of Practice

Other Documents

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3. Terms and definitions

In this document:

"shall" indicates a requirement

"should" indicates a recommendation

"may" indicates a permission

"can" indicates a possibility or a capability

GUIDANCE NOTES *are shown in italic text and are intended to assist the reader with understanding provisions.*

When referring to the ACCS Standards, refer to the ACCS Standard, followed by the year of issue, followed by the provision – such as **ACCS 0:2020, 4.3.**

3.1 **Age Categorisation**	Means an indication established that a citizen is of an age that is within a category of ages, over a certain age or under a certain age to a specified level of confidence and by reference to information or factors related to that citizen.
3.2 **Age Check Exchange**	Means an online internet gateway for age check providers and relying parties to assess user asserted, permissioned and verified attributes. *[PAS 1296:2018 – 2.1.2]*
3.3 **Age Check Practice Statement**	Means the document describing the operational practices and procedures of an age check service *[PAS 1296:2018 – 2.1.1]*
3.4 **Age Check Provider**	Means an organisation responsible for all the processes with establishing and maintaining a subject's identity attributes. *[PAS 1296:2018 – 2.1.2]*
3.5 **Age Check Service**	Means the entity that makes available attributes for the purposes of age checking *[PAS 1296:2018 – 2.1.5]*
3.6	

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Age Determination	Means an indication established that a citizen has a particular age stated to a specified level of confidence and by reference to information related to that citizen. *[PAS 1296:2018 – 2.1.4]*
3.7 **Age Estimation**	Means an indication by estimation that a citizen is likely to fall within a category of ages, over a certain age or under a certain age to a specified level of confidence by reference to inherent features or behaviours related to that citizen
3.8 **Age Verification Process**	Means the inter-related or interacting activities that transforms a series of attributes into an age verification product. *[ISO 17065:2012 – 3.5]*
3.9 **Age Verification Product**	Means the result of an age verification process. *[ISO 17065:2012 – 3.4]*
3.10 **Certification Requirement**	Means a specified requirement that is fulfilled by the client as a condition of establishing and maintaining certification. *[ISO 17065:2012 – 3.7]*
3.11 **Certification Scheme**	Means the Age Check Certification Scheme. *[ISO 17065:2012 – 3.9]*
3.12 **Client**	An organisation that has applied for certification or been granted certification that is responsible to ACCS for ensuring that the certification requirements are fulfilled. *[ISO 17065:2012 – 3.1]*

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4. Target of Evaluation

Scope of the Age Estimation Technology under Evaluation

4.1 The scope of the age check system under evaluation shall be defined and recorded on the certification agreement.

4.2 The scope shall include:

(a) the name given to the age check system by the client;
(b) the operating parameters of the age check system including:
    a. any process limitations;
    b. any prerequisites for operation;
    c. any tethering required (such as connectivity) for operation;
    d. any technological requirements;
    e. any performance throttling applied to the output of the technology (such as disregarding results through uncertainty assessments);
(c) the version or deployment reference of the target of evaluation.

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5. Technical Requirements

Age Check Services

5.1 Age Check Services verify age attributes on request by a third party on a transaction-by-transaction basis under a pre-arranged contractual relationship with the Age Check Provider.

5.2 Age Check Services shall produce an assessment of the extent to which it meets the age check principles relating to:

a) Transparency
b) Consent
c) Blindness
d) Enduring Permission
e) Commercial Model
f) Attribute Metrics
g) Data Minimisaton

[PAS 1296:2018 4.5.2]

5.3 Age check services shall categorise its authoritativeness and conformity assessment as a source of age-related data by reference to its clientship of ACCS. This is as independent third-party certification by an accredited certification body or as other-party validation by a certification body belonging to a particular community of interest.

[PAS 1296:2018 4.2.2 & 4.3.1.2.1]

5.4 The age check service shall record any additional standards to which it claims conformity and the basis of the claim.

[PAS 1296:2018 4.3.1.2.2]

5.5 The age check service shall provide an age check practice statement containing the minimum list of attributes that can be provided by the age check service.

[PAS 1296:2018 4.3.2.1.2]

5.6 The age check service shall record the system used for assessing and scoring the age check practice statement in order to establish the conformity assessment category. This shall include a record of:

a) Scoring or assessment and scoring system used;
b) How assessment and scoring was performed; and
c) Management of the assessment information (whether governed or shared)

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5.7 The age check service shall categorise the vectors of trust score that can be placed in the yes/no response to an age check.

5.8 The age check service shall provide metadata for each attribute it providers in the categories of:

a) Attribute derivation
b) Chain of custody
c) Access control
d) Consent
e) Description
f) Last update date
g) Source

Requirements for Age Exchange Service Providers

5.9 Age Check Exchanges provide an online gateway for Age Check Providers and Relying Parties to access user asserted, permissioned and verified attributes.

5.10 Age Check Exchanges shall produce an assessment of the extent to which it meets the criteria for assessing the exchange relating to:

a) Integrity
b) Dynamic age check exchange
c) Categorising relying parties
d) Commercial model
e) Attribute metrics
f) Multiplicity

[PAS 1296:2018 8.4.1]

5.11 Age Check Exchanges shall have an auditable trust framework for all parties involved in the exchange either as age check services or as relying parties in accordance with the Scheme Rules.

Requirements for Online Relying Parties

5.12 An online relying party rely on results of an age check to establish the age-related eligibility of an individual for the purposes of a transaction or entry to a domain with age-restricted content.

5.13 The relying party shall include within their age checking policy (as required by Section 5.2):

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a) The advance warnings to be displayed to users indicating their approach to accessing age-restricted content, goods or services to create an expectation that an age check will occur;
b) The nature and characteristics of the relying party's users;
c) How the relying party determines the standards to which it requires any age check services it uses to conform;
d) Whether the relying party's service is intended for children or others who need responsible third parties involved in their day-to-day decisions and in such cases, whether parental or responsible third party involvement is needed; and
e) Whether the relying party can build its own in-house age check service (in which case the requirements for age check service would apply).

5.14 The relying party shall obtain and hold a copy of:

a) The Age Check Certification Scheme Certificate of Conformity of the Age Check Services or Age Check Exchange used (if applicable);
b) The data protection policy and data protection impact assessment (redacted for any commercial details) of the Age Check Services used;
c) The authoritativeness category of the Age Check Services used – note that relying parties are not permitted to use an Age Check Service with no evidence of authoritativeness or where self-validated, the ACCS is satisfied that appropriate assessment of the authoritativeness of the age check service has been undertaken by the relying party);
d) The age check practice statement for the Age Check Services used;
e) The Age Check Service's assessment of the extent to which it meets the age check principles;
f) If using an Age Check Exchange, an assessment of the extent to which the age check exchange meets the criteria set out in PAS 1296:2018;

5.15 The relying party shall hold a record of the vectors of trust score that can be placed in the yes/no response to an age check for any age check services it uses. The relying party is not permitted to rely upon an age check with a low vector of trust that contains attributes for:

a) Identity Proofing P0 or P1;
b) Primary Credential Usage C0 or Ca;
c) Primary Credential Management Ma;
d) Assertion Permission Aa

5.16 The relying party shall check that the contract or trust framework stipulates the auditing requirements for any age check services it uses.

5.17 The relying party shall request the metadata for each attribute the age check service provide in the categories of:

a) Attribute derivation
b) Chain of custody
c) Access control

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d) Consent
e) Description
f) Last update date
g) Source

5.18 The terms relating to the provision of metadata shall be included in the service level agreement with the age check provider and be available on request for each transaction or age check decision.

5.19 The relying party is not permitted to:

a) Rely solely on the user to confirm their age with no cross-checking of information, for example by using a 'tick box' system or requiring the user to only input their date of birth;
b) Use a general disclaimer such as 'anyone using this website will be deemed to be over 18';
c) Accept age verification through the use of online payment methods which may not require the user to be over 18; or
d) Checking against publicly available information or otherwise easily known information such as name, address and date of birth.

5.20 The relying party shall implement measures that are effective at preventing access to age-restricted content, goods or services by non-human operators including algorithms.

Requirements for Offline Relying Parties

5.21 An offline relying party rely on results of an age check carried out by a member of staff to establish the age-related eligibility of an individual for the purposes of a transaction for the purchase of age-restricted content, goods or service or entry to an age-restricted area or premises.

5.22 An offline relying party shall include in their age checking policy (as required by Section 5.2):

a) The advance warnings to be displayed to customers, their positioning and prominence, to create an expectation that an age check will occur, this shall include for the provision of any signage required by law;
b) The policy to be adopted with regard to the age at which customers will be challenged for age verification;
c) The nature and characteristics of the relying party's customers and service users;
d) The nature and types of identification that it will accept as Proof-of-Age which shall, as a minimum, include a Proof-of-Age Standards Scheme approved ID card;
e) How the relying party determines the standards to which it requires any age checking to be undertaken by staff;
f) The training policy for clients of staff responsible for age checking;
g) Whether the relying party's service is intended for children or others who need responsible third parties involved in their day-to-day decisions and in such cases, whether parental or responsible third-party involvement is needed;

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h) Whether the relying party is implementing automated age checking procedures (in accordance with the requirements in Section 10.3); and
i) Whether the relying party can build its own in-house age check service (in which case the requirements for age check service would apply).

5.23 An offline relying party that implements an automated age-checking procedure (such as an electronic ID application, biometrics or other technical measures) shall comply with the provisions for an online relying party set out in Section 9.

5.24 The relying party is not permitted to adopt a policy that:

a) Seeks to identify the certification scheme or law enforcement test purchasers;
b) Uses a general disclaimer such as 'anyone entering these premises or buying these goods is deemed to be over 18';
c) Requires staff to ask the age, but not to verify the age, during a transaction;

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About ACCS

The Age Check Certification Scheme is an independent not-for-profit certification scheme for providers of age restricted goods, content or services. We check that age systems work. Our scheme, backed by the Northern Powerhouse Investment Fund, can be utilised to provide full conformity assessment in accordance with all aspects of age restricted sales. We offer a range of services, including Test Purchasing, which deploys our award-winning Android & iOS App, and boast a state-of-the-art Age Check Test Studio which enables the scientific examination of age check systems.

Internationally recognised Standards

Our scheme provides evidence that your age check practices meet international standards.

Highly qualified certification officers

Our locally sourced certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check Certification Scheme

www.accscheme.com

An independent not-for-profit company registered in England and Wales (11493870) at Unit 321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL

From: s 47E(d) @esafety.gov.au
Sent: Friday, 10 September 2021 10:44 AM
To: s 47F
Cc: Tony Allen; s 47F
Subject: RE: Age verification call for evidence [SEC=OFFICIAL]

Hi s 47F

Thank you for ACCS's submission to eSafety's *call for evidence*.

The information you have provided supports us in developing an implementation roadmap for a proportionate and feasible age verification regime for online pornography.

Kind regards
The AV Roadmap team

eSafety acknowledges the Traditional Custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

From: s 47F @accscheme.com>
Sent: Thursday, 9 September 2021 8:56 PM
To: s 47E(d) @esafety.gov.au
Cc: Tony Allen s 47F @accscheme.com>; s 47F @accscheme.com>
Subject: Age verification call for evidence

Dear Sir/ Madam,
Please find the submission form and relevant attachments for your attention.
If you require any further information or assistance, please do not hesitate to contact me.
Kind regards

s 47F

Certification Officer

Asia and Australasia

Age Check Certification Scheme

www.accscheme.com

s 47F

s 47F

AGE CHECK CERTIFICATION SERVICES PTY LTD

ABN 66640499921

This message is for the intended recipient only. If you have received it in error, please return it and delete it from your systems. Mail sent by Age Check Certification Services Ltd is scanned for viruses prior to dispatch, but we accept no liability for any viruses that become attached to the Mail and we recommend that you scan messages on receipt. The content of the message and any attachment may be confidential and may only be used by the recipient for the purpose for which it was intended. All intellectual property rights of Age Check Certification Services Ltd are asserted. If you have any queries about the e-mail policies of Age Check Certification Services Ltd, please contact info@accscheme.org.uk. Age Check Certification Scheme is an independent not-for-profit 3rd party certification scheme for providers of age restricted goods, content or materials developed in accordance with BS EN ISO 17065:2012. It is a company limited by guarantee registered in England at Unit 316 Broadstone Mill, Broadstone Road, Stockport, UK, SK5 7DL (registered number 11493870). Services to the company, including all procurement, employees, communications, contracts, certification services and audits are provided under a Supply of Services Agreement by Age Check Certification Services Ltd (registered number 07357348) registered in England at Unit 316 Broadstone Mill, Broadstone Road, Stockport, UK, SK5 7DL.

From: s 47E(d) @esafety.gov.au
Sent: Monday, 22 November 2021 6:20 PM
To: s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]
Attachments: Agenda - International AV and Safety Tech Roundtable - 30112021.pdf

Hi all

Please find attached the agenda and discussion questions for our consultation session next Tuesday.

We look forward to speaking with you then,
The AV Roadmap team

From: s 47E(d) @esafety.gov.au
Sent: Wednesday, 17 November 2021 3:56 PM
To: s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hi all

Thank you for your interest in participating in **eSafety Australia's Age Verification roadmap: AV and safety tech roundtable.**

Please be advised that the meeting will be held at the Australian High Commission in London. For those attending in person, please be aware that there are no parking facilities at the venue.

Meeting details	
Time	11-12.30pm GMT
Date	Tuesday 30 November
Location	Australian High Commission Australia House, Strand, London, WC2B 4LA, United Kingdom

A meeting agenda, participant list and series of discussion questions will be shared with you prior to the meeting.

For those who are unable to attend in person, please use the following meeting link to access the session:

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting
Or call in (audio only)
+61 2 9161 1238,,173253097# Australia, Sydney
Phone Conference ID: 173 253 097#
Find a local number | Reset PIN

Learn More | Meeting options | Legal

From: s 47E(d) @esafety.gov.au
Sent: Monday, 8 November 2021 10:14 AM
To: s 47E(d) @esafety.gov.au
Subject: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hi

INVITATION TO PARTICIPATE IN ESAFETY'S AGE VERIFICATION ROADMAP CONSULTATIONS

We invite you to participate in a roundtable with Australia's eSafety Commissioner – Julie Inman Grant, and other age verification and safety tech organisations on **Tuesday 30 November (11am-12.30pm, London time)**. The roundtable will inform eSafety's development of an age verification roadmap for online pornography.

The eSafety Commissioner (eSafety) is Australia's online safety regulator. We work to safeguard Australians at risk from online harms and to promote safer, more positive online experiences. On 1 June 2021, the Australian Government requested eSafety develop an implementation roadmap for a mandatory age verification (AV) regime relating to online pornography. Following our *call for evidence*, eSafety is now undertaking a series of consultations that further explore what constitutes a holistic approach to preventing children's access to online pornography and protecting them from potentially harmful sexual content.

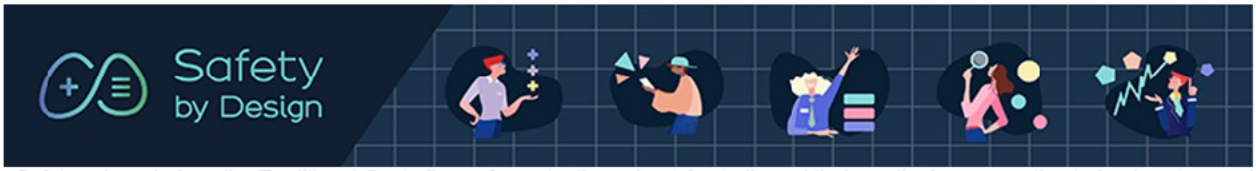
eSafety's objective is to identify a proportionate, feasible and effective system for age assurance, as well as other technical and non-technical solutions that support young people's digital resilience and wellbeing. We believe your insights on age assurance standards, frameworks and technologies, technological effectiveness and appropriate use cases will assist us in meeting that objective.

Our intention is to hold the roundtable in London (*with a video link available for those located elsewhere*). If you are interested in participating, please **RSVP to this email** and we will send through further meeting information once a venue is confirmed. An agenda, participant organisations and a list of discussion questions will be shared prior to the meeting.

We hope to speak with you soon, please don't hesitate to contact us for any further information.

Kind regards,

Age Verification Roadmap Team



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Australian Government | eSafetyCommissioner

Meeting Agenda

Meeting	AV Roadmap consultation: International AV and Safety Tech organisations
Location	Australian High Commission Australia House, Strand, London, WC2B 4LA, United Kingdom **OR** Microsoft Teams meeting **Join on your computer or mobile app** Click here to join the meeting **Or call in (audio only)** +61 2 9161 1238,,173253097# Australia, Sydney Phone Conference ID: 173 253 097# Find a local number | Reset PIN
Date and time	Tuesday 30 November 11am-12.30pm GMT / 10pm-11.30pm AEDT
Participants	Tony Allen, CEO, Age-check Certification Scheme s 47F s 47F s 47F s 47F s 47F s 47F s 47F s 47F s 47F s 47F **eSafety** Julie Inman Grant (eSafety Commissioner) s 22 s 22 s 22 s 22 s 22

Agenda

Item	Description	Time
1	Welcome	5 min
2	eSafety: Overview • Who we are & what we do • Consultation terms of reference • Roadmap: an explainer • Intersections across eSafety's remit	10 min
3	Discussion	60-70min
4	Other matters & next steps	5 min

Discussion questions

1. **What do you consider as proportionate technological measures for mitigating children's exposure to pornography on: pornography sites; social media and gaming platforms; search engines; other websites, etc?**
    a. What role, and what measures could be in place for others in the digital ecosystem – such as device manufacturers and app stores?
2. **Should different AA/AV technologies and safety technologies be deployed - dependent on the age-appropriateness or capacities of individuals? (e.g. facial analysis vs. age verification)?**
3. **What role can content moderation, proactive filtering and parental controls play alongside AV/AA in creating more age-appropriate experiences for platform and service users?**
    a. What role should ISPs, mobile service providers, platforms and services and pornography companies play in an 'ecosystem' approach?
4. **What privacy preserving and data security measures should AV/AA systems utilise - what do you think is most appropriate for accessing pornography?**
    a. How do you ensure only the relevant attributes are provided to requesting third parties?
5. **How important is the role of standards, technical requirements and certification when it comes to AV/AA for online pornography?**
    a. Are there pre-eminent or global standards emerging to guide the broader AV/AA or safety tech industries?
    b. What does an effective and efficient certification/re-certification process look like? Who should be responsible for certifying products in a global market?
6. **What steps do you think are necessary in terms of informing the public, policy makers and industry on the effectiveness of AV/AA technologies?**
7. **What needs to be done to move towards global interoperability for these technologies?**
8. **How would you balance providing adult users with a 'low friction' experience and preventing children from accessing adult content?**

9. **The cost of utilising such technologies has been flagged by smaller platforms and services as prohibitive to uptake and utilisation. How can this issue be addressed by the industry?**

10. **What needs to be done to build awareness, understanding and trust in AV and AA technologies?**
    a. Is transparency reporting on effectiveness enough – what about the role of independent auditing?
    b. Whose responsibility is it to educate and inform the public about how these technologies work – and to discuss any tensions between privacy and security?

11. **What do you consider the biggest impediments are to the adoption, implementation and success of utilising age verification or age assurance for the purpose of limiting children's access to online pornography?**

From: s 47E(d) @esafety.gov.au
Sent: Tuesday, 30 November 2021 10:35 AM
To: s 47F
Cc: s 47F ; s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Categories: Filed

Hi s 47F ,

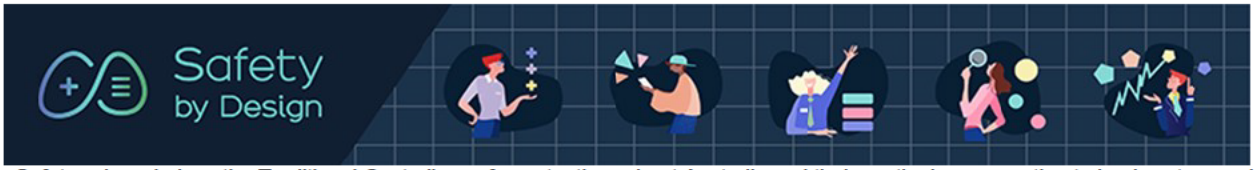
That is completely understandable. Please see the meeting link below for your reference:

Meeting link:

Microsoft Teams meeting
Join on your computer or mobile app
Click here to join the meeting
Or call in (audio only)
+61 2 9161 1238,,173253097# Australia, Sydney
Phone Conference ID: 173 253 097#
Find a local number | Reset PIN

Kind regards,

Age Verification Roadmap Team



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From: s 47F @gmail.com>
Sent: Tuesday, 30 November 2021 9:56 AM
To: s 47E(d) @esafety.gov.au
Cc: s 47F @accscheme.com>; s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hello again

And thanks for confirming. I totally appreciate the need to step up Covid secure measures given the emergence of the Omicron variant in recent days.

In light of tomorrow's timings (11am start, with travel time in advance) **it is probably more sensible that I participate through the online link included in your previously attached agenda.**

Not - I hasten to add as a fall-back to proving negative - but just in case practicalities between now and tomorrow morning make it difficult to get a lateral test flow done and verified.

I look forward to meeting you tomorrow (albeit, probably virtually)

Many thanks and regards

s 47F
Independent Consultant (working with the Age Check Certification Scheme)

s 47F

Sent from Mail for Windows

From: s 47E(d) @esafety.gov.au
Sent: 29 November 2021 22:36
To: s 47F
Cc: s 47F ; s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hi s 47F ,

We have received further information that Australia House is requesting that all attendees take a lateral flow test in advance of the meeting, and to be able to prove a negative result (either SMS or email) from the NHS on arrival. In addition, masks will need to be worn throughout the duration of your stay at Australia House.

Kind regards,

Age Verification Roadmap Team

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From: s 47F @gmail.com>
Sent: Monday, 29 November 2021 9:12 PM
To: s 47E(d) @esafety.gov.au
Cc: s 47F @accscheme.com>; s 47E(d) @esafety.gov.au

Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Many thanks for sending this through.

Yes, I'll be attending in person and will bring along photo ID.

And to confirm, I'm attending on behalf of Tony Allen, CEO of ACCS.

Look forward to meeting the AV Roadmap Team tomorrow.

Regards and thanks

s 47F
Independent Consultant

Tel s 47F

Sent from Mail for Windows

From: s 47E(d) @esafety.gov.au
Sent: 29 November 2021 00:38
To: s 47F
Cc: s 47F ; s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Dear s 47F ,

We look forward to speaking with you on Tuesday. Please see the meeting details below.

The meeting will be held at the Australian High Commission in London and also online. Please be aware that there are no parking facilities at the venue. Attendees will also need photo identification for entry.

Meeting details	
Time	11-12.30pm GMT
Date	Tuesday 30 November
Location	Australian High Commission Australia House, Strand, London, WC2B 4LA, United Kingdom

An agenda and list of discussion questions are attached.

We would appreciate if you could please confirm by return email if you will be attending in person or online.

Kind regards,

Age Verification Roadmap Team

eSafety acknowledges the Traditional Custodians of country throughout Australia and their continuing connection to land, waters and community.We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

From: s 47F @accscheme.com>
Sent: Friday, 26 November 2021 7:26 PM
To: s 47E(d) @esafety.gov.au
Cc: s 47F @gmail.com>
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hello,

I hope you're well. Thank you for providing Tony will the meeting details. Unfortunately, he is now not able to attend, but Age Check Certification Scheme will be ably represented by s 47F of the Proof of Age Standards Scheme (PASS), who is copied into this email.

Is there any way you can add s 47F to the participant list for the meeting and forward on all relevant information?

Thank you very much,
s 47F

s 47F
Project Administrator | Age Check Certification Scheme
www.accscheme.com
Broadstone Mill | Broadstone Road | Stockport | SK5 7DL | s 47F
Registered in England | 07357348 | VAT Registered GB 996 2087 72

From: s 47E(d) @esafety.gov.au s 47E(d) @esafety.gov.au>
Sent: 10 November 2021 00:44
To: s 47F @accscheme.com>
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Thank you s 47F - we will send though an agenda and meeting invitation for Tony shortly.

Regards,
The Age Verification Roadmap Team

From: s 47F @accscheme.com>
Sent: Tuesday, 9 November 2021 7:25 PM
To: s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hi,

Please can I RSVP for Tony Allen, Chief Executive Officer at Age Check Certification Scheme, for the eSafety event on Tuesday 30th November? Thank you.

Best regards,
s 47F

s 47F
Project Administrator | Age Check Certification Scheme
www.accscheme.com
Broadstone Mill | Broadstone Road | Stockport | SK5 7DL | s 47F
Registered in England | 07357348 | VAT Registered GB 996 2087 72

From: Tony Allen s 47F @accscheme.com>
Sent: 09 November 2021 07:53
To: s 47F @accscheme.com>; s 47F @avpassociation.com>
Subject: FW: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hi s 47F ,

Please can you RSVP this for me and put it in the diary. Can you also check with s 47 that he received the invite too and if he hasn't for some reason, please could you work with him and the e-safety commissioner's office to get him along too (assuming he's available).

Many thanks

Tony

From: s 47E(d) @esafety.gov.au s 47E(d) @esafety.gov.au>
Sent: 07 November 2021 23:25
To: s 47E(d) @esafety.gov.au
Subject: RE: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Apologies- **please see revised time.**

Kind regards,

Age Verification Roadmap Team

eSafety acknowledges the Traditional Custodians of country throughout Australia and their continuing connection to land, waters and community.We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

From: s 47E(d) @esafety.gov.au
Sent: Monday, 8 November 2021 10:14 AM
To: s 47E(d) @esafety.gov.au
Subject: eSafety: Invitation to participate in eSafety Australia's Age Verification roadmap consultations [SEC=OFFICIAL]

Hi

INVITATION TO PARTICIPATE IN ESAFETY'S AGE VERIFICATION ROADMAP CONSULTATIONS

We invite you to participate in a roundtable with Australia's eSafety Commissioner – Julie Inman Grant, and other age verification and safety tech organisations on **Tuesday 30 November (11am-12.30pm, London time)**. The roundtable will inform eSafety's development of an age verification roadmap for online pornography.

The eSafety Commissioner (eSafety) is Australia's online safety regulator. We work to safeguard Australians at risk from online harms and to promote safer, more positive online experiences. On 1 June 2021, the Australian Government requested eSafety develop an implementation roadmap for a mandatory age verification (AV) regime relating to online pornography. Following our *call for evidence*, eSafety is now undertaking a series of consultations that further explore what constitutes a holistic approach to preventing children's access to online pornography and protecting them from potentially harmful sexual content.

eSafety's objective is to identify a proportionate, feasible and effective system for age assurance, as well as other technical and non-technical solutions that support young people's digital resilience and wellbeing. We believe your insights on age assurance standards, frameworks and technologies, technological effectiveness and appropriate use cases will assist us in meeting that objective.

Our intention is to hold the roundtable in London (*with a video link available for those located elsewhere*). If you are interested in participating, please **RSVP to this email** and we will send through further meeting information once a venue is confirmed. An agenda, participant organisations and a list of discussion questions will be shared prior to the meeting.

We hope to speak with you soon, please don't hesitate to contact us for any further information.

Kind regards,

Age Verification Roadmap Team

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From: s 47E(d) @esafety.gov.au
Sent: Friday, 18 March 2022 1:59 PM
To: s 47E(d) @esafety.gov.au
Subject: For Action: eSafety AV roadmap consultations - meeting feedback [SEC=OFFICIAL]
Attachments: Meeting notes - AV and Safety Tech - International.docx

Categories: Filed

Dear stakeholders,

Thank you for your contribution to eSafety's Age Verification (AV) Roadmap consultation process on 30 November 2021. eSafety appreciates the time you have taken to engage with us and share your detailed expert insights.

eSafety is inviting participant feedback on de-identified meeting notes that will inform the consultation summaries to be published on eSafety's website in due course. Specifically, we welcome feedback on whether eSafety has accurately captured the content discussed and the views presented.

Although published summaries will not be linked to individual organisations, the final roadmap report will list the organisations that participated in the consultation process.

To ensure the consideration of your feedback, could you please provide a response by **COB Friday 1 April 2022.**

Next steps

Consultation summaries will be published on eSafety's website once all the summaries from the first phase of consultations have been finalised. We will notify you when they are available.

Please do not hesitate to get in contact should you have any queries.

Kind regards,

The AV Roadmap team

eSafety acknowledges the Traditional Custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

Relevant Industry: *Age verification and safety technology*

Standards and frameworks

- Stakeholders advised that work is underway on an international standard for age assurance technology. The standard would be 'technology neutral' and could be used to assess existing and emerging technologies.
- Stakeholders stated that interoperability is crucial across national ecosystems and frameworks. They believe that mutual recognition of national standards should be a focus of regulators.
- Stakeholders noted that trust is critical for the adoption and success of age assurance and verification technologies by consumers. They suggested that a mechanism or resources be established by government, for consumers to confirm that service providers are legitimate, can be trusted and meet government's minimum standards.
- Stakeholders shared information on the European Union's 'EU Consent project', noting the project aims to develop an interoperable network of age assurance providers where the provider will be certified to a specific standard.

Existing and future solutions

- Stakeholders:
    - highlighted that there are age assurance technologies which operate entirely on individual devices. This allows age estimation/assurance to occur on a device, or a device's internet browser, preventing an individual's underlying data from moving across different servers. This assists apps or services accessed on that device in gauging the user's age attribute.
    - explained that identity verification is not necessary for age verification because age attributes can be decoupled from identity information. Stakeholders suggested that this can be achieved through vectors of trust such as 'zero knowledge proofs'.
    - suggested there may be an opportunity for re-usable digital IDs, specifically those that allow people to selectively share age attributes only.
    - noted that if interoperable measures are introduced, then consumers who have already done age checks for other reasons, such as purchasing alcohol, could re-use that age check to access adult content.

Challenges

- Some stakeholders felt it was not appropriate to use individual identity information to access pornography sites as this may not be the most privacy-preserving or data-minimising approach.
- Stakeholders acknowledged the challenge of public awareness and educating people on what age assurance and verification tools are, how to use them, and which tools are safe and reliable.

- Stakeholders suggested increased data disclosure may lead individuals to attempt to evade compliance measures. They suggested that this could lead pornography users (and potentially children) to access non-compliant platforms which may host more extreme and harmful content.
- Stakeholders flagged challenges in some services allowing users who are 13 and over to access their platforms, while also permitting content that may be inappropriate for those young users under their terms of service. They recommended greater exploration of content moderation and filtering on such platforms.
- Stakeholders noted the importance of embedding a child rights lens and considering the risks to children from product features at a granular level. Stakeholders suggested that all content that is age-rated should be age-gated in some way, to create experiences for children online that are appropriate and safe.
- Stakeholders reflected that in other spaces, such as online gambling which follows Know Your Customer (KYC) regulatory requirements, business models were able to adjust for the additional costs of verifying users. Stakeholders noted that this may not be the same for all pornography sites – some of which are small scale businesses. Despite this, stakeholders observed that the cost of age verification and age assurance had decreased significantly over time, and that it should no longer be a barrier as the age assurance tech industry grows.
- Stakeholders suggested that small businesses operating pornography websites under a particular revenue threshold could be given access to age assurance solutions for free.
- Stakeholders suggested that a perceived imbalance between user privacy, safety and security enhances aversion to adopting and accepting child protection measures. They submitted that the digital rights of both children and adults need to be actively promoted and explained in relation to any technological solutions recommended under the roadmap.

Trust and privacy

- Stakeholders advised that enabling choice for consumers is critical for building trust in these measures.
    - Stakeholders suggested that a prerequisite for establishing user trust is to ensure there are 'no surprises', meaning there should be transparent disclosure and explanation about why the age assurance or verification measures are in place, how they work and how data is processed and/or stored.
    - Stakeholders noted that the average person may be more likely to engage with information that is available on the platforms and services they frequently access, rather than seeking out information on a government website. They proposed that information on regulatory requirements, platform safety measures and age assurance or verification certification details should be shared by platforms and services.

- Stakeholders discussed that many age assurance or verification solutions that rely on government ID are appropriate for use cases such as gambling or purchasing alcohol. However, stakeholders acknowledged that accessing pornography is a very different user experience (for example, tube sites often do not require accounts or payments).
- Stakeholders noted that companies interested in using age assurance technologies still hold concerns about providing data to third parties.

Subject: Prep Call for s 22 eSafety Pre-recording for Global Summit
Location: Microsoft Teams Meeting

Start: Mon 18/03/2024 7:00 PM
End: Mon 18/03/2024 7:45 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: s 47F

Hi s 22 ,

As just discussed. 😊

Many thanks,
s 47F

s 47F

Microsoft Teams meeting

Join on your computer, mobile app or room device
Click here to join the meeting

Meeting ID: 395 257 890 207
Passcode: exHaBy
Download Teams | Join on the web

Learn More | Meeting options

From: s 22
Sent: Thursday, 21 March 2024 5:56 PM
To: s 47F ; Tony Allen
Cc: s 22
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F and Tony

Thanks for your time on the phone earlier this week and for sending through the additional information about the expo booth. We look forward to hopefully sharing some interesting pieces with attendees.

Noting the time for the presentation, we've compiled a list of discussion prompts for the pre-record and would be most appreciative of any updates/additions you may have.

Introductions (2 minutes)	• Very brief introduction to s 22 , and to the overall remit of eSafety.
Overview of the roadmap (3 – 5 minutes)	• Brief overview of the scope and purpose of the age verification roadmap, the process for developing it and the key recommendations. • General outline of the current status of Roadmap recommendations, including following the government response.
Overview of the Online Safety Act and where age assurance fits (10)	• Explain of the different elements and nuances of the Online Safety Act in Australia, including 2023/24 developments, and how they relate to age assurance. Including: o Online Content Scheme o Basic Online Safety Expectations and where the current amendments to the determination are up to. o Industry Codes and Standards, and current status, including the second phase which involves class 2 content (including pornography)
What are the specific challenges in Australia?	• Explain current domestic context and intersections with other legislation and reform (including developments relating to Digital ID and the review of Privacy Act)

(3)	
What are the opportunities to drive forward developments? (3)	• Opportunities available in relation to the review of the Online Safety Act, and an ecosystem-driven approach in alignment with the Industry Codes • Global cooperation and alignment across approaches and standards.
What is eSafety doing next? (3)	• Online Safety Act review • Tech trends issues paper • Second phase of Industry Codes

Very happy to continue to discuss / workshop these. I'm on leave from this afternoon until the 28th. Once I'm back, I will be able to keep iterating on the discussion points / making the questions sound conversational! In the meantime, should anything urgent pop up – please reach out to s 22 , who is acting Manager, Regulatory Policy and Strategy and is cc'd.

Thanks,
s 22

s 22

From: s 47F @accscheme.com>
Sent: Thursday, March 14, 2024 8:16 PM
To: s 22 @esafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

Hi s 22 , 8am GMT on Monday works great – I'll send through a Teams invite for us.

Thank you,
s 47F

From: s 22 @esafety.gov.au>
Sent: Wednesday, March 13, 2024 10:58 PM
To: s 47F @accscheme.com>
Cc: Tony Allen s 47F @accscheme.com>; s 22 @eSafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Thanks s 47F – that would be great. Monday or Tuesday would be preferable. Does 8am GMT / 7pm AEDT work for you?

Kind regards,
s 22

s 22

From: s 47F @accscheme.com>
Sent: Wednesday, March 13, 2024 7:52 PM
To: s 22 @esafety.gov.au>
Cc: Tony Allen s 47F @accscheme.com>; s 22 @eSafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

Hi s 22 ,

Thanks for your email and for letting us know about your leave.

It would be great to discuss s 22 's session in more detail – I wonder if we could get a call in some time next week?

Given the time difference, would a slot first thing in the morning UK time work for you? We can accommodate most days next week if a particular day suits.

Do let us know, thanks. 😊

Kind regards,

s 47F

s 47F

From: s 22 @esafety.gov.au>
Sent: Wednesday, March 13, 2024 7:02 AM
To: s 47F @accscheme.com>
Cc: Tony Allen s 47F @accscheme.com>; s 22 @eSafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

I wanted to reach out to let you know I'll now also be on leave from 22 – 27 March. I'll provide an alternate contact from the team for any urgent issues during that time.

If possible, it would be great to be able to workshop with you any questions for the session or otherwise provide any input before that time, so we can make sure s 22 is prepared when she returns from a well-deserved break!

Look forward to discussing with you

Thanks,
s 22

s 22 [redacted]

From: s 47F [redacted] @accscheme.com>
Sent: Tuesday, February 20, 2024 6:39 PM
To: s 22 [redacted] @eSafety.gov.au>; s 22 [redacted] @esafety.gov.au>
Cc: Tony Allen s 47F [redacted] @accscheme.com>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

> You don't often get email from s 47F [redacted] @accscheme.com. Learn why this is important

Hi s 22 [redacted],

Great, thanks so much. I've updated your speaker profile online.

Good to e-meet you s 22 [redacted], we'll be in contact soon.

Kind regards,
s 47F [redacted]

s 47F [redacted]

Policy & Regulation Specialist | Age & ID Assurance

s 47F [redacted] [redacted] @accscheme.com | www.accscheme.com | @agecheckcert

LinkedIn https://www.linkedin.com/in s 47F [redacted]

Roles:
Policy & Governance Coordinator | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Governance Coordinator | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Regulation Specialist | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Executive Assistant | Tony Allen | Subject Matter Expert | Age & ID Assurance

From: s 22 @eSafety.gov.au>
Sent: Monday, February 19, 2024 9:59 PM
To: s 47F @accscheme.com>; s 22 @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; Tony Allen s 47F @accscheme.com>; s 22 @esafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

Apologies for the delay. Image and bio are attached, and the headline is "Manager, Regulatory Policy & Strategy" (although Manager of Regulatory Policy would also be fine if you're pressed for space).

Happy to workshop questions over the next few weeks. I've also copied in s 22 from my team – she can be your main point of contact while I'm away from 18 March – 2 April as she is across all of our work in relation to age assurance.

Kind regards,
s 22

s 22

eSafety acknowledges the Traditional Custodians of country throughout Australia and their continuing connection to land, waters and community.We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past, present and emerging.

From: s 47F @accscheme.com>
Sent: Wednesday, February 14, 2024 8:00 PM
To: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; Tony Allen s 47F @accscheme.com>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

Hi s 22 ,

Thank you. 8am / 6pm for you sounds perfect, I will send a placeholder through now.

You've been added as a Speaker so if you could now send through the following details, that would be great:

- **An image you'd like to be used, in PNG file type;**
- **Your Headline, i.e. Head of Regulatory Policy**
- **A short bio detailing background and experience (50 – 100 words would be best)**

I look forward to hearing from you,

Many thanks
s 47F

s 47F

Policy & Regulation Specialist | Age & ID Assurance

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

https://www.linkedin.com/in/s 47F

Roles:
Policy & Governance Coordinator | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Governance Coordinator | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Regulation Specialist | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Executive Assistant | Tony Allen | Subject Matter Expert | Age & ID Assurance

---

From: s 22 @eSafety.gov.au>
Sent: Tuesday, February 13, 2024 9:55 PM
To: s 47F @accscheme.com>; s 22 @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; Tony Allen s 47F @accscheme.com>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

This all looks good, thank you! We could look at scheduling the pre-record at 8 or 9am UK time on 3 April, which would be 6 or 7pm my time – does that work for you?

I received an email yesterday indicating I've already been registered (thank you) – please let me know if there's anything else I need to do at this stage.

Kind regards,
s 22

s 22

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From: s 47F @accscheme.com>
Sent: Friday, February 9, 2024 8:50 PM
To: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; Tony Allen s 47F @accscheme.com>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

Dear s 22

We're delighted that you'll be able to do a pre-recording for us & participate in the Summit. **Would Wednesday 3rd April (UK) work for you**? Apologies, I'm not sure on how big the time difference is!

Following on from your proposed session details, please can you review the following and confirm whether it is ok/ whether you'd like to make any changes.

Session Title: Status of Online Safety Regulation in Australia: Intersections with Age Assurance

Session Purpose: To provide an up-to-date overview of where Australia is in terms of next steps and recommendations, as set out in their Roadmap for age verification.

We'd also be very grateful if you could register for the Summit using the following link - Global Age Assurance Standards Summit (ringcentral.com)

This is so we'll be able to add you as a Speaker.

I look forward to hearing from you,

Thank you,
s 47F

s 47F

Policy & Regulation Specialist | Age & ID Assurance

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

https://www.linkedin.com/ins 47F

Roles:
Policy & Governance Coordinator | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Governance Coordinator | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Regulation Specialist | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Executive Assistant | Tony Allen | Subject Matter Expert | Age & ID Assurance

---

From: Tony Allens 47F @accscheme.com>
Sent: Friday, February 9, 2024 7:13 AM
To: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

Hi s 22

Thank you for getting back to me.

Your change in session title is absolutely fine, as is your timetable for a pre-record. My colleague s 47F will make arrangements to set that up.

Best Regards

Tony

From: s 22 @eSafety.gov.au>
Sent: Thursday, February 8, 2024 10:16 PM
To: Tony Allen s 47F @accscheme.com>; s 22 @eSafety.gov.au>; s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Hi Tony

Thanks for reaching out and offering the opportunity for remote participation and/or a pre-record. We should be able to make one of these options work, but we'd like to request a slight reframing of the session. Rather than presenting on eSafety's analysis of age assurance technologies (which we assume would focus on chapter 8 of our age verification roadmap's background report), could we present on the status of online safety regulation in Australia, focusing on intersections with age assurance? This would enable us to provide a more up-to-date overview of where Australia is up to in terms of the next steps and recommendations set out in the roadmap, rather than focusing on the 2021-23 analysis leading to those recommendations. As an aside, we intend to continue updating our knowledge base on age assurance to reflect developments over time; to this end, we're hoping to release a short paper in the coming months to distil the key points of our background paper into a more digestible product and to incorporate the findings of the NIST evaluation and various other international and industry developments.

If this option works for you, I would be happy to be the speaker. Please note I'll be on leave from 18 March until 2 April, so any pre-meeting or pre-recording will need to take place between 2 and 8 April. If that timing will be challenging for your team, I can talk to colleagues and see whether someone else from our policy and/or regulatory teams might be well placed to contribute.

Happy to discuss further.

Kind regards,
s 22

s 22

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From: Tony Allen s 47F @accscheme.com>
Sent: Monday, February 5, 2024 10:06 PM
To: s 22 @eSafety.gov.au>; s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

> You don't often get email from s 47F @accscheme.com. Learn why this is important

Hi s 22

Thank you for getting back to me.

Whilst we'd love to see you in Manchester, I had anticipated that you'd likely be dialling in. The timing for the slot would mean that it was early evening in Australia. If possible, it is good to do these things live, but we could also do a pre-record.

I think its really important that we get you involved in this global event.

Best Regards

Tony

From: s 22 @eSafety.gov.au>
Sent: Monday, February 5, 2024 10:40 AM
To: Tony Allen s 47F @accscheme.com>; s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>
Subject: RE: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02 [SEC=OFFICIAL]

OFFICIAL

Dear Tony

Many thanks for your email.

I'm putting you in touch with s 22 who heads up our Regulatory Policy and Strategy team where our age verification work sits. She'll be the best person to discuss this with, but I do think given timing and travel we may be an apology for your event.

Best wishes
s

From: Tony Allen s 47F @accscheme.com>
Sent: Saturday, February 3, 2024 10:08 PM
To: s 22 @eSafety.gov.au>; s 47F @accscheme.com>
Subject: RSVP REQUIRED - Global Age Assurance Standards Summit - Speaker/Moderator Session - 09GR02

> You don't often get email from s 47F @accscheme.com. Learn why this is important

Hi s 22

Thank you for agreeing to participate in the Global Age Assurance Standards Summit in Manchester, UK and online on 8th to 12th April 2024. You have either applied for or been nominated to take part in a Session, Workshop or Presentation as described below. We are currently timetabling the whole week's worth of activities, so I would be very grateful if you could read the following **and RSVP by reply to all on this email by Thursday 8th February** (please keep the same subject header).

Session Title: AU: eSafety Commissioner's Analysis of Age Assurance Technologies
Speaker: s 22 (or a nominated colleague at the eSafety Commissioner's Office (Please Confirm))

Date: Tuesday 9th April 2024
Time: 09:30 (UK) to 09:55 (UK)
Room: Grow
Capacity: 80
Room Style: Theatre
Purpose of the Session: To set out the work of the AU eSafety Commissioner on securing age assurance in the content and peer-to-peer communications sectors of Australia

Please confirm by reply to this email by Thursday 8th February with a note (RSVP) on whether or not this time, date, subject and room are suitable for you.
Please Note: If you are involved in more than one session, workshop or presentation at the event you will receive a separate email for each one.

IN-PERSON OR REMOTE

It is our strong preference for speakers or moderators to participate in person in Manchester, but we recognise that this is a global event so that may not be possible. Please tell us if you plan to participate remotely otherwise we will assume you intend to be in person in Manchester.

REGISTRATION

If you have not already done so **all attendees must** register on the event portal - Global Age Assurance Standards Summit (ringcentral.com) for a **free ticket**. You can use that same link to invite any colleagues, clients or guests to attend the event too. There's helpful information about the event, including about travel, hotels and practical tips on this link.

NOMINATE A COLLEAGUE

You may have received this because you have indicated that your organisation would like to participate in a session, workshop or presentation, but that it will actually be a colleague of yours that will attend. Please **tell us this on your reply**, with the details of your nominated colleague (make sure they know you've nominated them and that they have registered on the above link).

SPEAKER'S ONLINE BOOTH

As a speaker, you will also shortly receive an invitation from the Age Check Certification Scheme to your booth admin page. This page is specifically for you to create an online space for links to materials or web resources that you may be referring to in your session or simply to provide links back to your company or organisation (please try to keep them relevant). **Please Note:** This booth admin page is specific to you (but you can forward it to a colleague to prepare for you). If you are involved in more than one session, workshop or presentation at the event you will only receive one booth (so you will need to cover materials for all). If you don't receive your link check your junk mail or get in touch with us.

SPONSORS or TECH SHOWCASE

If you are also sponsoring an activity at the event, you will receive a separate second booth for that sponsorship and, if you are involved in a Tech Showcase, you will receive a separate booth for that Tech Showcase. Depending on your levels of involvement, your organisation could possibly end up with 3 booths – so keep your content relevant, distinctive and clear for each of them.

WHAT HAPPEN'S NEXT

We will be in touch again with more information about the preparation of your session, workshop or presentation, but for now, please just RSVP to this message to assist with our planning.
Please send your RSVP to us by **Thursday 8th February 2024.**
We are hugely grateful for your participation in this huge, global event on such a hot topic as Age Assurance is. We couldn't be doing it without you.

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

LinkedIn https://www.linkedin.com/in/tonyallenctsp/

Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

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Subject: eSafety Session Pre-record for Global Age Assurance Summit
Location: https://us06web.zoom.us/j/84309465008?pwd=b31Alth3zVv7N57vRAxHt0WvNazbSJ.1

Start: Wed 3/04/2024 6:00 PM
End: Wed 3/04/2024 7:00 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: s 47F

Hi s 22

I hope you had a lovely time off. 😊

I am sending a Zoom invite for tomorrow's pre-recording for the Global Summit; we think Zoom will work best when it comes to recording.

Please connect using the link below.

Thank you!

s 47F

Join Zoom Meeting
https://us06web.zoom.us/j/84309465008?pwd=b31Alth3zVv7N57vRAxHt0WvNazbSJ.1

Meeting ID: 843 0946 5008
Passcode: 612428

One tap mobile
+13602095623,,84309465008#,,,,*612428# US
+13863475053,,84309465008#,,,,*612428# US

Dial by your location
- +1 360 209 5623 US
- +1 386 347 5053 US
- +1 507 473 4847 US
- +1 564 217 2000 US
- +1 646 931 3860 US

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- +1 669 900 6833 US (San Jose)
- +1 689 278 1000 US
- +1 719 359 4580 US
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- +1 253 205 0468 US
- +1 253 215 8782 US (Tacoma)
- +1 301 715 8592 US (Washington DC)
- +1 305 224 1968 US
- +1 309 205 3325 US
- +1 312 626 6799 US (Chicago)
- +1 346 248 7799 US (Houston)

Meeting ID: 843 0946 5008
Passcode: 612428

Find your local number: https://us06web.zoom.us/u/kDWxAwYgB

For organizers: Meeting options | Reset dial-in PIN

From: Age Check Certification Scheme <no-reply@events.ringcentral.com>
Sent: Friday, 5 April 2024 1:20 AM
To: s 22
Subject: We're looking forward to welcoming you to the Global Age Assurance Standards Summit

Hi s 22 **,**

We are greatly looking forward to welcoming you next week, either in person in Manchester or online to the Global Age Assurance Standards Summit. Experts from around the world will gather to develop international standards for age assurance – the process of proving your age online without disclosing your identity.

We are now at capacity for in person attendance, but your colleagues can still sign up for remote access. All the information you need to participate should be available in the conference portal - https://events.ringcentral.com/magic_links/42d2d066-1452-4797-8692-529b73db3aa7/accept. For those travelling, the conference team will be happy to assist – ask anyone in a green t-shirt for help.

Members of the International Standards Organisation (ISO) Working Group on Identity Management and Privacy Technologies will be meeting alongside the Summit. Other standards organisations such as BSI, the UK Accreditation Services (UKAS), ITU-T and IEEE will also be presenting.

Speakers include representatives of a host of global regulators including the UK's Ofcom and ICO, the data protection authorities of France, Spain and Ireland, as well as Germany's KJM, South Africa's Film and Publication Board and the Australian e-Safety Commissioner.

Campaign groups and charities will also be well represented, with contributions from the 5 Rights Foundation, NSPCC, Molly Rose Foundation and Australia's Collective Shout.

Sessions will focus on particular industries with an interest in age assurance including advertising, with representatives from the Advertising Standards Authority, ISBA, the World Federation of Advertising and the International Alliance for Responsible Drinking, as well as vaping, gambling and the automotive industry.

- We've been working with BSI on a ground-breaking Summit Communique that we are aiming to publish next Friday. All participant organisations in the Summit are free to provide further comments - click here. The comment window will close at 15:00 (UK Time) on Tuesday 9th April. The Communique has no legal force -

it's just a statement of the status of age assurance standards - but if you don't want to be included as a participant, then do let us know.

- Google and Meta are both hosting workshops and attending organisations include all the leading household names in the technology sector.

- Leading global providers of age verification and age estimation solutions will participate in a technology showcase hosted by the Age Verification Providers Association.

- Non-profit, euCONSENT ASBL will host a number of sessions to explain its approach to creating a global solution for interoperable, reusable age checks.

- Project DefAI will share its plans to tackle attempts to circumvent age assurance technology with deepfakes and AI generated attacks.

The summit aims to agree a communique summarising its conclusions, to which you are invited to contribute, and recommendations that will be submitted to the United Nations committees that champion the rights of children online.

The conference is funded by Safe Online which is the only global investment vehicle dedicated to keeping children safe in the digital world. Safe Online's goal is to strengthen systems and catalyse innovative solutions to make the internet a safe place for children to explore, learn and develop. It has been organised by the Age Check Certification Scheme in partnership with the Age Verification Providers Association.

We are really grateful to our event and hospitality sponsors, ***Yoti***, ***Meta***, ***Luciditi***, ***Bird & Bird***, ***Veratad***, ***ACCS***, ***AVPA*** ***and*** ***VerifyMy***. Do please take a moment to take a look at the services that they provide.

So, travel safely if you are coming to sunny* Manchester (Travel & Event Info Packs), or mark your calendars (Add to Calendar) for the sessions you wish to attend remotely so you don't miss them!

Kind regards

Tony Allen

Chief Executive, ACCS

* Locally defined to mean “not raining constantly”

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From: s 22
Sent: Tuesday, 16 April 2024 12:46 PM
To: s 47F
Subject: RE: Global Age Assurance Summit recordings [SEC=OFFICIAL]

OFFICIAL

Thanks so much for the timeline s 47F – there was so much great content, we're just eager to catch up! Appreciate it's a lot of content to edit!

Thanks again,
s 22

s 22

From: s 47F @accscheme.com>
Sent: Monday, April 15, 2024 7:25 PM
To: s 22 @esafety.gov.au>
Cc: Tony Allen s 47F @accscheme.com>
Subject: RE: Global Age Assurance Summit recordings [SEC=OFFICIAL]

Hi s 22

Thank you for your email & apologies for the delayed response – I'm only now able to catch up on emails from last week!

The recordings will be available within the next 2 weeks. We have one person working on editing the footage and, as you can image, with 240 sessions, that's a lot to condense!

Thanks for your patience & of course thank you to s 22 for her wonderful session, which was very well received. 😊

Best wishes,
s 47F

s 47F

Policy & Regulation Specialist | Age & ID Assurance

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

LinkedIn s 47F

Roles:
Policy & Governance Coordinator | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Governance Coordinator | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Policy & Regulation Specialist | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Executive Assistant | Tony Allen | Subject Matter Expert | Age & ID Assurance

---

From: s 22 @esafety.gov.au>
Sent: Tuesday, April 9, 2024 7:29 AM
To: s 47F @accscheme.com>
Subject: Global Age Assurance Summit recordings [SEC=OFFICIAL]

OFFICIAL

Hi s 47F ,

Hope all is going well with the summit in Manchester– I just wanted to ask if you knew when the replay / recordings will be available for each day's sessions?

Thank you,
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past, present and future.

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From: Tony Allen s 47F @accscheme.com>
Sent: Wednesday, 1 May 2024 4:47 PM
To: Julie Inman Grant
Cc: s 47F @euconsent.eu; s 22
Subject: Re: Age Verification trial [SEC=UNOFFICIAL]

Hi Julie,

What fabulous news this is. We're really looking forward to working with you in whatever way we can to bring this all to life.

Best regards

Tony

Sent from my I-Phone

> On 1 May 2024, at 05:45, Julie Inman Grant wrote:
>
> Your ears must have been burning, s . I was just thinking of you in light of this announcement!
>
> It is definitely exciting forward progress!
>
> We are still short on implementation details but will gladly take you up on the offer to engage when we know more!
>
> All the best, Julie
>
> Get Outlook for iOS
>
> ---
>
> **From:** s 47F @euconsent.eu
> **Sent:** Wednesday, May 1, 2024 2:17 PM
> **To:** Julie Inman Grant
> **Cc:** s 22 ; Tony Allen
> **Subject:** Age Verification trial
>
> You don't often get email from s 47F @euconsent.eu. Learn why this is important
>
> Dear Julie,
> I just saw the news! Fantastic!
> We detected a tiny hint of a change of attitude amongst government policy staff in s 47F presentation to the summit we had at the start of the month, but did not expect anything to happen quite so quickly or at such scale.

I appreciate that there will be formal processes to follow to determine who and how any trial there is delivered. We are of course standing by to support this initiative to whatever extent is helpful – from friendly advisor to being part of its delivery.
We, as euCONSENT ASBL, announced at the same summit that we've persuaded the industry to move to an even more privacy preserving, on-device, tokenised approach, building in concepts proposed by the French CNIL and the Spanish AEPD into our industry standards. We are building that now with support from Safe Online, the global fund hosted by UNICEF.
Of course, we would strongly recommend effective engagement with stakeholders in Australia to design and deliver any trial – we found a consortium allowed us to bring together civil society, academics, relying parties and technology solution providers, so perhaps a similar one might emerge in Australia – we would of course love to be involved in that to share our knowledge and experience, but it would be a mistake to assume that the emerging European solution is automatically the answer in your country.
Anyway, for now, thank you for what I am sure was some patient internal persuasion to move this forward. We will do anything we can to make the next step a success.
Best wishes

s 47F
s 47F
Secretary General
euCONSENT ASBL
s 47F
s 47F @euCONSENT.eu
Numéro d'entreprise 0800678976
Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
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From: Tony Allen s 47F @accscheme.com>
Sent: Tuesday, 28 May 2024 10:58 PM
To: Tony Allen
Cc: s 47F
Subject: Compendium & Communique from the Global Age Assurance Standards Summit
Attachments: ACCS-GlobalSummit-Compendium-FINAL.pdf; ACCS-GlobalSummit-Communique-FINAL.pdf

EMBARGO 00:01 THURSDAY 30 MAY 2024

Dear Panellist, Speaker or Participant,

I am writing to provide you with an embargoed copy of the Compendium and Communique from the Global Age Assurance Standards Summit held in Manchester on 8 – 12 April 2024. As one of our esteemed speakers, panellists or participants in the event, you'll find reference to your input in the Compendium.

It has been a mammoth task to gather together all of the content, recordings, slides, activities, photos and interviews from the week-long event and distil this down into a Compendium that we can publish. It represents the most comprehensive assessment of the state of age assurance technologies, standards and deployments as the state-of-the-art in this sector. We are making the Compendium and Communique available for public use on a royalty free, perpetual, attributed source, non-commercial rights to reproduce basis. Rights are reserved to authors on any links, slides or materials referenced in the Compendium. We also intend to publish both as official publications with ISBN numbers on Thursday.

There are a lot of thanks in the Compendium, but for this distribution, I want to particularly thank each of you individually for putting together the materials, presentations, slides and contributions to the whole week. It is all of that effort that is so appreciated and, we hope, captured in this Compendium.

We'll be releasing it all publicly on 30th May, so do keep an eye out for that. Feel free to share it, take snippets from it, post about it or use it for your own research and development from Thursday onwards (but please don't share it before then).

Thank you all again.

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

s 47F | www.accscheme.com | @agecheckcert

LinkedIn https://www.linkedin.com/in/tonyallenctsp/

Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
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Age Check Certification Scheme

Global Age Assurance Standards Summit 2024

Manchester | UK | 8-12 April

COMMUNIQUE

Project Financed by
Safe Online

Global Age Assurance Standards Summit

The Global Age Assurance Standards Summit between April, 8 2024 and April, 12 2024, a project supported by Safe Online has worked in partnership with the British Standards Institution (BSI) to bring together over 700 interested parties including governments, regulators, international organisations, civil society, academia, industry, age assurance service providers, standards developers and technical experts to prepare this communique to reflect the position, state of the art and development of age assurance standards as at April, 12 2024.

Headline

Age Assurance **can** be done.

Age Assurance **can** be deployed, with the right process for the right use cases, in a manner that is privacy preserving, secure, effective and efficient.

Age assurance **can** be a valuable tool amongst a range of measures deployed to protect children in the digital environment.

This would be assisted by securing **International Standards**, which are implemented and respected by providers of services that are required to make age related eligibility decisions.

Laws and regulations **can** create the legal framework with robust enforcement procedures in place to secure the protection of children from harm.

If deployed proportionately and effectively, Age Assurance represents an opportunity to enhance the fundamental rights of children in a digital age, in addition to protecting anonymity and the freedoms of adults to enjoy online goods, content and services.

Definition

Age assurance is the process of establishing, determining and/or confirming an age assurance attribute, including age verification, age estimation and age inference. [ISO/IEC CD 27566-1]

Disclaimer

This publication has been produced with financial support from Safe Online and organisational support from the Age Check Certification Scheme and British Standards Institution. However, the opinions, findings, conclusions, and recommendations expressed herein are those from the collective input of participants at the Summit and do not necessarily reflect those of Safe Online; the Age Check Certification Scheme or the British Standards Institution.

Preamble

1. Whereas the UN Committee of the Rights of the Child outlined the range of rights at play for children in the digital environment in General comment No. 25 (2021) on children's rights in relation to the digital environment of March, 2 2021 (CRC/C/GC/25)

2. Recalling General Comment No. 20 on the implementation of the rights of the child during adolescence (CRC/C/GC/20), in which the United Nations recognized the importance of protecting children from all forms of violence, abuse and exploitation in the digital environment.

3. Noting the work of the United Nations Commission on International Trade Law, Working Group IV: Electronic Commerce addressing identity and trust services [UN/A/CN.9/WG.IV].

4. Acknowledging the recommendation CM/Rec(2018)7 of the Committee of Ministers to member States on Guidelines to respect, protect and fulfil the rights of the child in the digital environment.

5. The CEN CENELEC specification on age appropriate design makes reference to the need for all age assurance systems to protect the privacy of users in accordance with applicable laws, including human rights laws.[CEN-CENELEC CWA 18016 Age Appropriate Digital Services Framework]

6. The EU Artificial Intelligence Act follows a product safety approach, but with the new added element of a fundamental rights impact assessment. The first EU Commission standardisation request includes obligations related to fundamental rights and data protection. Standardisation bodies such as ETSI [STF 681(TCHF) Special Task Force on Age Verification] are already moving towards harmonised global standards on AI which are underpinned by the EU AI Act and are likely to include a requirement to consider fundamental rights impacts.

7. Noting that where age assurance tools are deployed that in many cases they will also be used by adults in order to determine that they are not a child (for example when accessing pornography sites, gambling sites, or when purchasing age restricted goods). The 9 core international human rights instruments apply in this context to all adult and child users.

8. Noting the UN Guiding Principles (UNGPs) on Business and Human Rights set out the responsibility of companies to respect human rights and children's rights in the digital environment.

9. Recalling the guide on Article 8 of the European Convention on Human Rights right to respect for private and family life, home and correspondence from the European Court of Human Rights, updated on 31 August 2022.

10. Recalling the EU Digital Services Act (DSA) Article 28 on Online protection of minors from October, 19 2022.

11. The Convention on the Rights of the Child and its Optional Protocols, as well as other relevant international human rights instruments, provide the legal framework for the promotion and protection of the rights of the child in the online context.

12. Acknowledging the benefits and opportunities that the digital environment offers for children's education, participation, creativity, expression and social inclusion, as well as the challenges and risks that it poses for their safety, privacy, well-being and development.

13. Noting with concern the increasing availability and accessibility of online services that may expose children to illegal or harmful content, such as pornography, violence, gambling, or products such as alcohol and tobacco, or that may collect, process or share their personal data without their consent, knowledge or understanding.

14. Noting with concern the existence of online platforms where children are exposed to the malice of adults.

15. Recognising the need for a global, coordinated and multi-stakeholder approach to ensure that online services are designed and delivered in a way that respects and protects the rights and best interests of the data subject, taking into account their evolving capacities and the diversity of their situations and needs.

16. Noting further the technical difficulties created by synthetic data and the need for any such standards to be responsive to developments in technology.

17. Welcoming the efforts of various actors, such as governments, regulators, international organisations, civil society, academia, industry and technical experts, to develop and implement age assurance regulations, mechanisms and standards for online services, which include specifications for self declaration, age estimation, age verification and age appropriate design.

17. Acknowledging the efforts of the International Standards Organisation through ISO/IEC JTC 1/SC 27/WG 5 to develop international standards for age assurance, most specifically:

- **ISO/IEC CD 27566 - 1 - Age Assurance Systems - Part 1:** Framework
- **ISO/IEC PWI 27566 - 2 - Age Assurance Systems – Part 2:** Technical approaches and guidance for implementation
- **ISO/IEC AWI 27566 - 3 - Age Assurance Systems - Part 3:** Benchmarks for benchmarking analysis

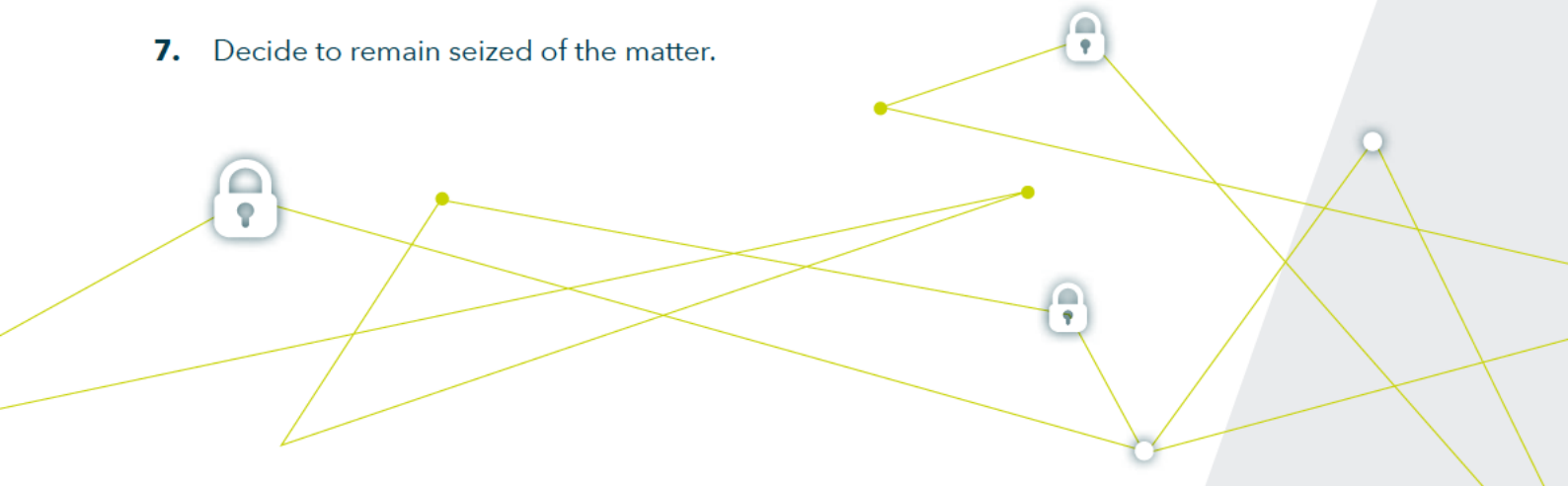
Acknowledging the efforts of the Institute of Electrical and Electronics Engineers to develop a global standard IEEE 2089.1-2024 Standard for Online Age Verification.

Call to Action

Bearing in mind the principles of necessity, proportionality, transparency, accountability and non-discrimination in the application of age assurance measures, as well as the respect for the views and preferences of the child and the role of parents, guardians and caregivers.

The Global Age Assurance Standards Summit identified that relevant parties and stakeholders should:

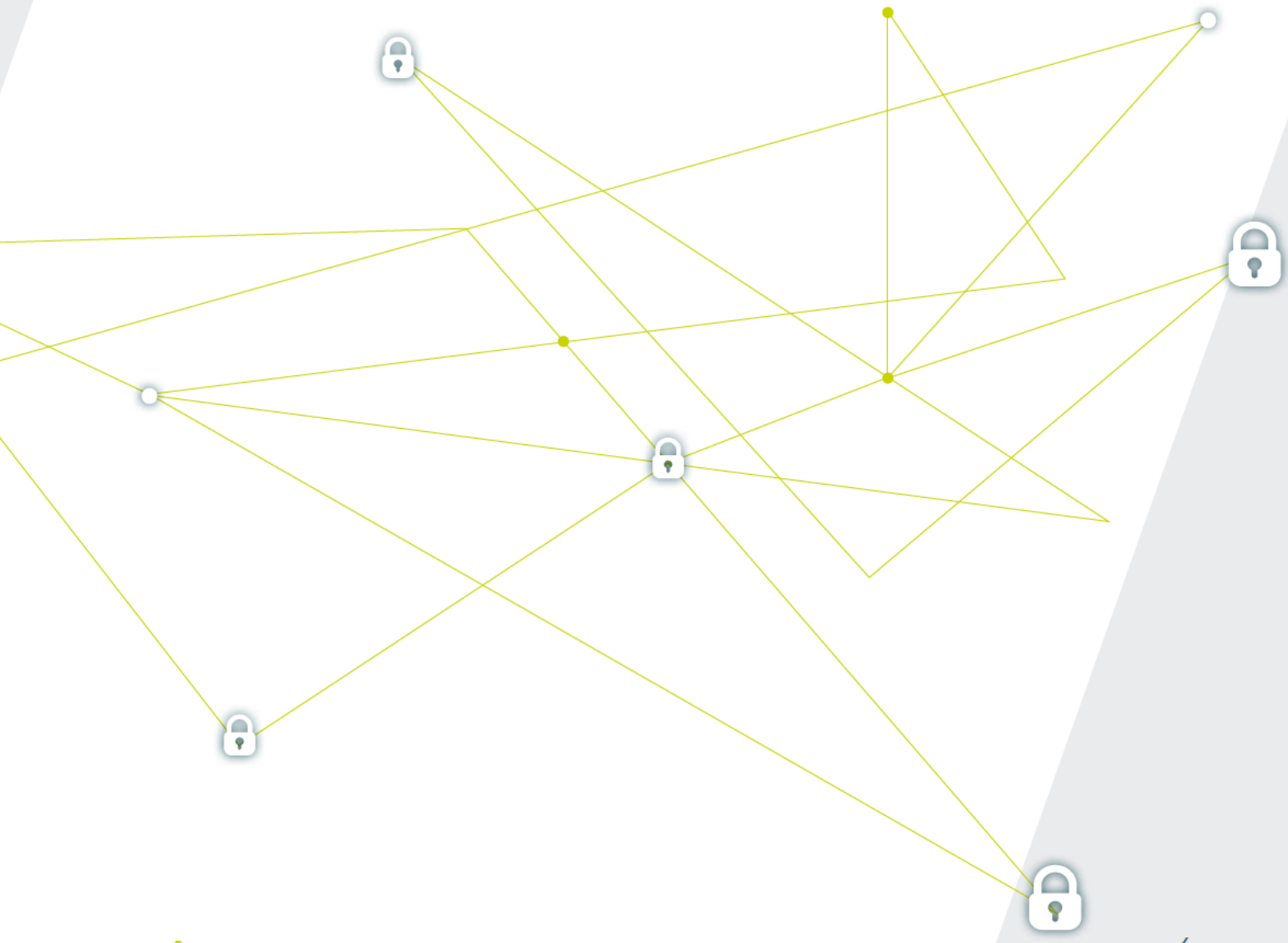
1. Support the future adoption of age assurance standards as a voluntary and flexible framework for making age related eligibility decisions;
2. Encourage all States to consider these international age assurance standards complementing their national legislation, policies and practices and to promote their adoption and implementation by providers;
3. Invite decision makers on age related eligibility to apply the international age assurance standards in their design and delivery of services and to ensure that their controls are transparent, accountable and respectful of the rights of individuals;
4. Call upon relevant stakeholders, such as international organisations, civil society, academia, industry and technical experts, to support the dissemination, adoption and implementation of the international age assurance standards, and to foster cooperation, dialogue and exchange of good practice among different actors and sectors;
5. Encourage age assurance companies to engage in human rights due diligence throughout the lifecycle of their products, in order to prevent and effectively prevent and/or address any adverse impacts on the full range of human rights and children's rights caused by, contributed to or linked to age assurance tools. This will ensure that age assurance tools can be deployed in a way that maximises the protection of children, whilst also maximising privacy and data protection for both children and adults;
6. Request Governments to report to appropriate international bodies on the progress made in the implementation of age assurance policies and practices, including the challenges and opportunities encountered, the lessons learned and the recommendations for further action;
7. Decide to remain seized of the matter.



International Age Assurance Standards

The international age assurance standards are a set of principles and guidelines for the development and implementation of age assurance mechanisms and standards for age related eligibility decisions. They are based on the existing and emerging good practice and initiatives in this field, as well as on the relevant international human rights instruments, especially the United Nations Convention on the Rights of the Child and its Optional Protocols. They aim to provide a common reference framework and a shared vision for all actors involved in the design and delivery of online services, and to foster a global, coordinated and multi-stakeholder approach to ensure that online services are respectful and protective of the rights and best interests of the child.

The international age assurance standards are voluntary and flexible, and they do not intend to prescribe or impose any specific technical or legal solutions. They recognize that different contexts and situations may require different approaches and methods and that age assurance is not a one-size-fits-all solution. They also acknowledge that age assurance is not a panacea or a substitute for other measures and actions to protect children online, such as education, awareness-raising, parental guidance and support and effective law enforcement.



Guiding Principles

The Global Age Assurance Standards Summit has identified these four main principles and twelve guidelines, as follows:

Principle 1: Age assurance should be based on the rights and best interests of the individual

Guideline 1.1: Age assurance systems should aim to protect and promote the rights and best interests of the individual in the online environment, in accordance with relevant international human rights instruments.

Guideline 1.2: Age assurance implementation should balance the protection and the empowerment of the individual and should not unduly restrict or limit their access to online services that are beneficial or appropriate for their age, development and well-being.

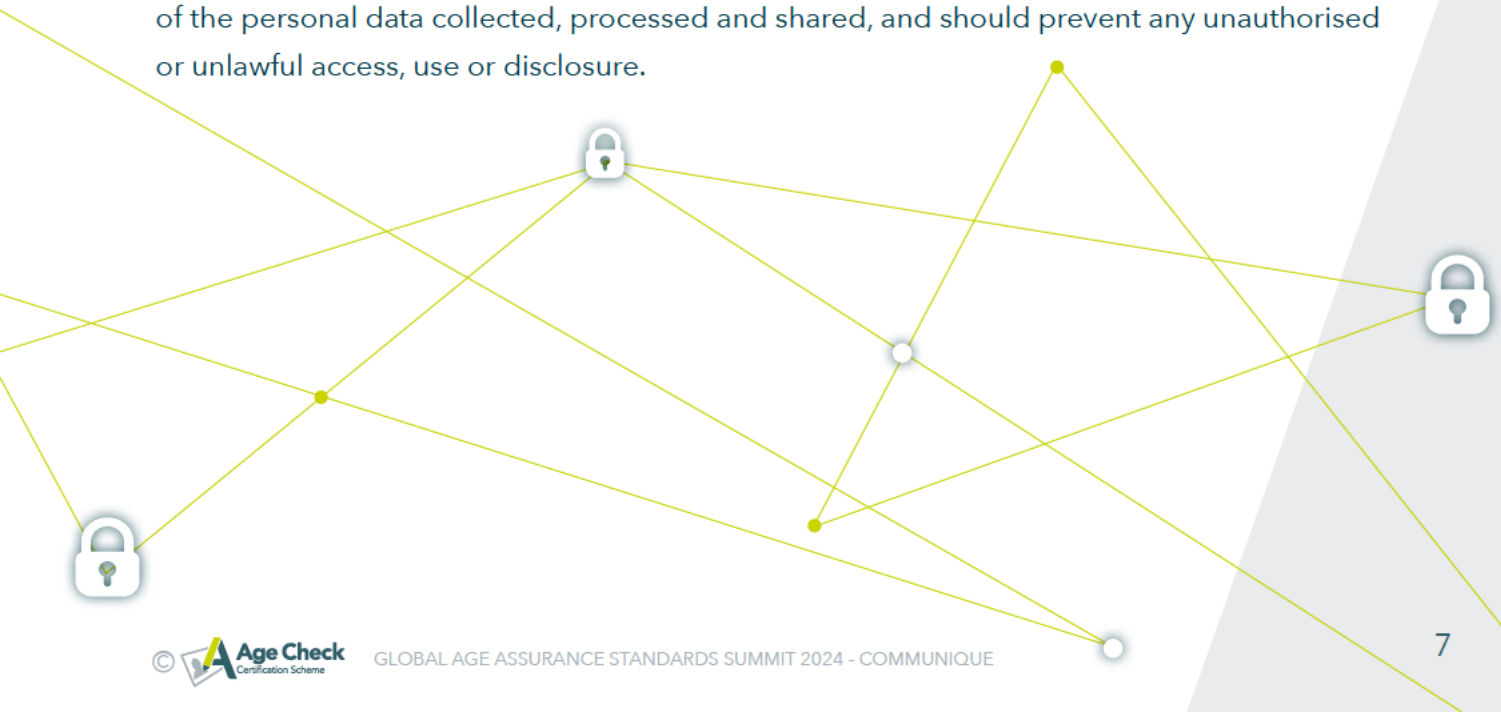
Guideline 1.3: Age assurance implementation should take into account the evolving capacities and the diversity of situations and needs of children of different ages, backgrounds and circumstances and should respect their views and preferences.

Principle 2: Age assurance systems should be based on the principle of data minimization

Guideline 2.1: Age assurance systems should only collect, process and share the minimum amount of personal data necessary and proportionate to achieve the intended purpose of making an age related eligibility decision thus protecting and respecting the rights and best interests of the data subject. Data should not be retained unless absolutely necessary and justified.

Guideline 2.2: Age assurance systems should use non-intrusive and privacy-preserving methods and techniques, and should avoid the onward sharing of hard identifiers, such as passports or biometrics, unless absolutely necessary, proportionate and justified.

Guideline 2.3: Age assurance systems should ensure the security, confidentiality and integrity of the personal data collected, processed and shared, and should prevent any unauthorised or unlawful access, use or disclosure.



Principle 3: Age assurance systems should be based on the principle of transparency and accountability

Guideline 3.1: Age assurance systems should provide clear, accurate, comprehensible and accessible information to the individual and where this is a child, also to their parents, guardians or caregivers about the purpose, method, scope and duration of the age assurance process, and about the rights and obligations of the parties involved.

Guideline 3.2: Age assurance systems should ensure user awareness of the methods, processes and approaches to making age related eligibility decisions in a publicly available age assurance practice statement.

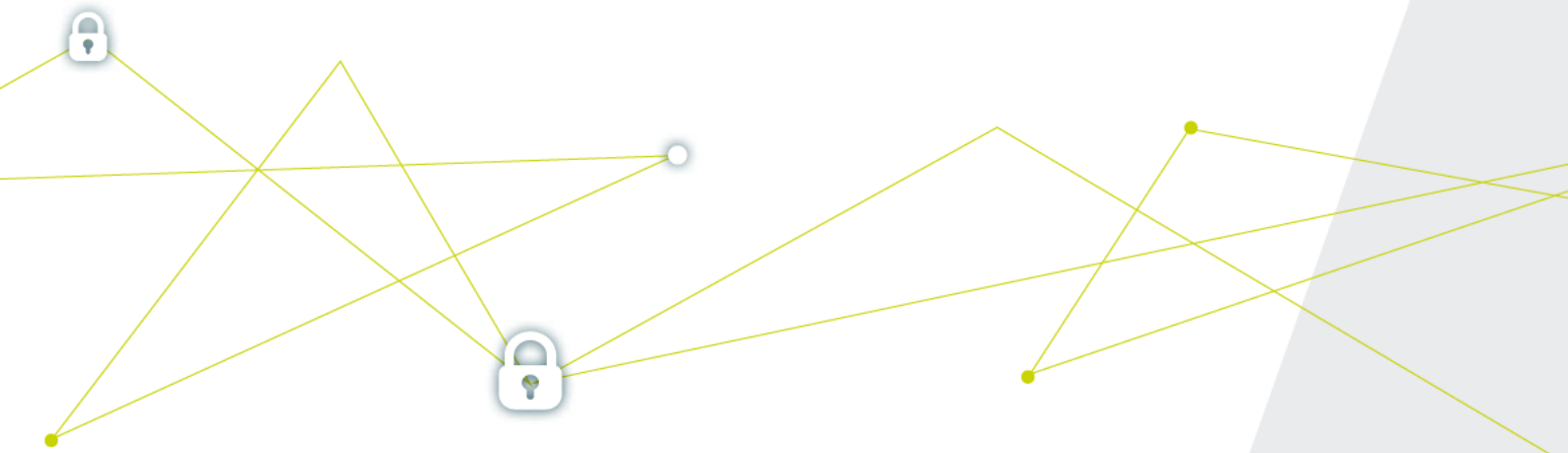
Guideline 3.3: Age assurance systems should provide effective mechanisms for the user and, where this is a child, also for their parents, guardians or caregivers to access, rectify, erase or object to the personal data collected, processed or shared, where applicable for the purpose of age assurance, and to lodge a complaint or seek a remedy in case of any violation of their rights.

Principle 4: Age assurance should be based on the principle of cooperation and participation

Guideline 4.1: Age assurance systems stakeholders involved in the design, development, implementation and evaluation of the system should ensure the participation and consultation of children and their parents, guardians or caregivers, as well as other relevant stakeholders, such as civil society, academia, industry and technical experts.

Guideline 4.2: Age assurance stakeholders should foster cooperation and coordination among different actors and sectors, such as governments, international organisations, civil society, academia, industry and technical experts, to ensure the consistency, interoperability and effectiveness of age assurance mechanisms, standards, privacy and security.

Guideline 4.3: Age assurance stakeholders should support the development and dissemination of good practice, guidance and tools for the implementation of age assurance mechanisms and standards, and should encourage innovation and research in this field.



As published in Manchester, United Kingdom at the conclusion of the Global Age Assurance Standards Summit on April, 12 2024.

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Age Check Certification Scheme

www.accscheme.com

Broadstone Mill, Broadstone Rd, Reddish, Stockport SK5 7DL, United Kingdom

sales@accscheme.com

(+44) 345-257-0018

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Global Age Assurance Standards Summit 2024

Manchester | UK | 8-12 April

COMPENDIUM

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Safe Online

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Introduction

Welcome to this compendium of the sessions at the first Global Age Assurance Standards Summit held in Manchester, United Kingdom from *8th to 12th April 2024*. We gathered more than **200 sessions, 77 hours of video, 40 slide decks and a synopsis** of all of the activity that took place over the week here in this single resource.

Why have a Summit

Almost every government around the world is grappling with the challenge of children being exposed to harmful content online. There's an easy policy decision to say 'we shouldn't let that happen'; but a much harder challenge to bring about an age aware internet. This Summit reflects the thirst for solutions to better protect the best interests of children online.

Why Now

We're at a pivotal stage in standards development. The International Standardisation Organisation (ISO) is progressing ISO/IEC 27566 - Age assurance systems - Framework through development. The Institute of Electrical and Electronics Engineers (IEEE) has just published IEEE 2089.1 on age verification online. The International Telecommunications Union held its inaugural meeting of a new Correspondence Group on Child Online Protection (CG COP) at the Summit in Manchester. In short, there is so much happening globally, we needed to have a Summit.

Why Manchester

Manchester is a booming Tech Powerhouse on the global stage, with the UK HQ's for the Information Commissioners Office, Ofcom and the Department for Science, Innovation & Technology. It's also where the global conformity assessment body for Age Assurance - the Age Check Certification Scheme - are based and our hosts for the Summit.

Objectives

We had five objectives for the Summit:

1. To progress ISO/IEC 27566-1 - Age assurance systems - Framework to a Committee Draft (CD stage) and progress two supporting documents to that with further working drafts
2. To engage the regulators of the world in the standards development process in support of proportionate, effective rules to safeguard children online
3. To showcase the diversity and breadth of innovating age assurance services available now, operating now, certified now and delivering for relying parties now
4. To build a body of evidence and knowledge - effectively this Compendium - for practitioners in the age assurance sector
5. To publish a Summit Communique - setting out the current status of the development of Global Age Assurance Standards and to submit this to the United Nations Convention on the Rights of the Child.

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Foreword

With over **2 billion children online** and an additional **1 billion** set to join, never before has protecting children's rights and safety in digital spaces been so critical. A global conference on age assurance is incredibly timely in this context

It is imperative that we centre children in discussions on online safety. Children are facing a myriad of online harms and exposure to harmful content; **In 2021 alone, 5 million children, aged 12-17, across 13 countries, experienced online sexual exploitation.**

Safe Online invests significantly in addressing digital harms, shaping policies and developing innovative technologies to detect and remove child abuse content. But we cannot do it alone. Online platforms and digital environments must implement standards that comply with legislation and promote transparency; and we must invest in research to understand the impacts of age assurance and develop more effective and inclusive solutions.

We can create a safer digital future for our children, but we must do it together.

Marija Manojlovic
Executive Director
Safe Online

Safe Online

Safe Online is the only global investment vehicle dedicated to keeping children safe in the digital world. Through investing in innovation and bringing key actors together, Safe Online helps shape a digital world that is safe and empowering for all children and young people, everywhere.

Learn more at
https://safeonline.global/

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Summary of Content

DAY 1: Setting Standards Page 09

Our Summit kicked off welcoming ISO/IEC JTC 1/SC 27/WG 5 (Identity and Privacy Management Technologies) to Manchester where, throughout the week, they progressed ISO/IEC 27566 - Age assurance systems - Framework. We also welcomed the International Telecommunications Union and various speakers from standards development throughout the world to the Summit.

DAY 2: Driving Improvement Page 27

A focus on the role of Regulators driving improvement as the world grapples with bringing rules and guide rails to the internet - particularly focused on the protection of children from harm. These sessions explored the difficult balancing challenges of delivering proportionate, effective regulation against a backdrop of concern about freedom of speech, privacy and security of data.

DAY 3: Reducing Risk Page 39

A technical day as we took a deep dive into deep fakes, the threat vectors for age assurance systems and how we guard and protect against system attacks - such as video injection attack. The Project DefAI team were welcomed to Manchester together with the benchmarking scientists from the National Institute of Standards and Technology (NIST) who have recently completed an analysis of age estimation technologies.

DAY 4: Tech Showcase Page 51

Our Tech Showcase in partnership with the Age Verification Providers Association enabled 12 deep tech innovators to show the diversity and range of age assurance technologies in the market place. We also hosted six panel sessions covering the deployment of this technology and key note speeches from online platforms and the European Commission.

DAY 5: Enabling a Safer Online Page 69

Our final day was dedicated to the 'Why Bother?' question. We set out to explore with civil society why age assurance is so important. How are children actually engaging with content on their devices and what are the consequences for getting this wrong. We sought to explore why there is such a pressing need to implement Global Age Assurance Standards.

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Executive Summary

As the Chief Executive of the Age Check Certification Scheme, my team and I were privileged to welcome delegates from around the world to discuss the critical issue of age assurance in the digital world, aiming to enhance online safety for children and ensure appropriate access for adults. We had some clear objectives in running the Summit – to progress international age assurance standards; to engage with regulators, service providers, users and others; to draw a line in the sand of the current state of development of standards; to showcase the diversity and breadth of innovation; and to build a body of evidence and knowledge for practitioners around the world.

This Compendium is that body of evidence. Through the hundreds of sessions, videos, submissions and materials, we're able to show how the age assurance sector is developing. This includes how it is transitioning from document-based verification to biometric methods, such as facial analysis and voice analysis, how it is emphasizing the importance of using certified and rigorously tested age assurance solutions and the necessity for certification marks and conformity assessments.

Welcoming global standardisation bodies, such as ISO, IEEE and ITU, our Summit advocates for cohesive global standards to supplement national laws and standards that promote technology-neutral approaches. We want to encourage regulators to adopt more robust online safety measures, particularly to protect children from harmful content.

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This Summit underscored the complexities of ensuring age assurance in the digital realm. By fostering international collaboration, advancing technological solutions and strengthening regulatory frameworks, the Summit set the stage for creating safer online environments for children and more secure access controls for adults. These efforts are essential for building a more responsible digital world.

We hope that you enjoy exploring the Compendium and all the links to the diverse resources that are available. Finally, my thanks to all speakers, sponsors, panellists and presenters, to my team and contractors for their support, to Safe Online for the financial backing and to all of the delegates – from all over the world – who either came along to Manchester or joined us online. Without you all, it simply would not have been possible.

"It has been our pleasure to host the world's thought leaders on age assurance technologies here in Manchester. Only by bringing these stakeholders together can we ensure the standards we are leading can be fit for the real world."

Tony Allen
Executive Director
Age Check Certification Scheme

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About ACCS

The Age Check Certification Scheme is a global, independent and accredited conformity assessment service. We test that ID and age check systems work. FInd out more at www.accscheme.com.

Navigating this Document

The Summit was split into five themed days covering the range of stakeholders and activity in the field of age assurance standards. This document follows those same five themes, with an executive summary at the beginning, information about the Summit Communique and next steps at the end.

Web Pages

We have created a full online resource of materials gathered at the Summit on our website at www.accscheme.com/gaass and through our social media channels (@agecheckcert) and particularly on our YouTube Channel (www.youtube.com/@agecheckcert)

Links in the Document

Look out for these five symbols in the document. For the online PDF, these are clickable links. If you've got the printed document, all of these links can be accessed from https://accscheme.com/gaass/.

Presentation Slides

Video

Document

Interview

Certification

Speaker Profiles

We have not included speaker profiles in this Compendium as we had over 100 speakers, panelists and participants in the programme. However, if their name is shown in underlined, by hovering over their name, there is a link to their LinkedIn public profile.

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DAY 1

8th April 2024

Setting Standards

Global leadership of new standards for age assurance systems

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DAY 1

On the Main Stage

The Global Age Assurance Standards Summit kicked off in Manchester on April 8, 2024, with a comprehensive agenda focused on setting standards for age assurance systems. Tony Allen, CEO of the Age Check Certification Scheme (ACCS), welcomed more than **700** delegates in person and online from **53** countries and outlined the week's schedule, emphasizing collaboration with international organizations such as ISO/IEC, euCONSENT and ETSI.

AVPA
The Age Verification Providers Association

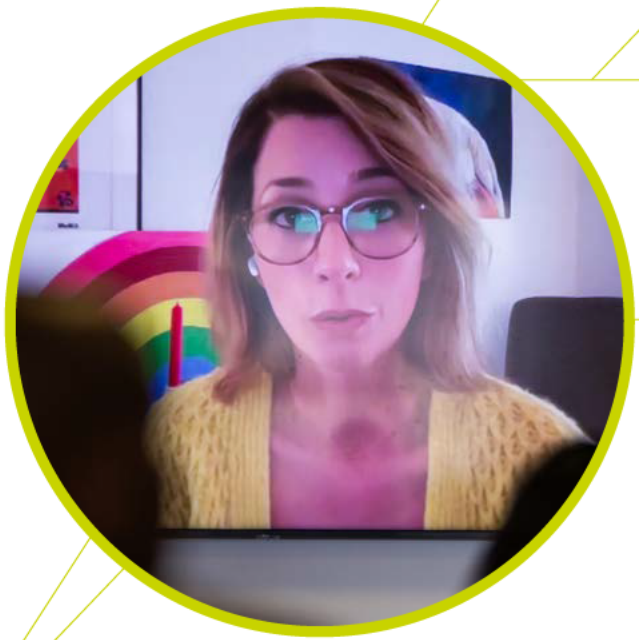
The day began with introductory sessions providing an overview of key initiatives and projects. Iain Corby from the Age Verification Providers Association discussed the importance of age assurance standards and highlighted upcoming events, including the Tech Showcase. Tony Allen then introduced the ISO 27566 Series of Standards, outlining its framework and technical aspects.

Iain Corby Tony Allen

Project DefAI

Deepak Tewari and Iain Corby presented the euCONSENT and DefAI projects, focusing on cross-border age verification and deepfake detection. These initiatives aim to address challenges in age assurance and enhance user privacy and security.

Iain Corby Deepak Tewari



Safe Online

The Safe Online project, represented by Marija Manojlovic, emphasized the intersection of age assurance and online safety for children. Marija highlighted global investments in age verification solutions and called for collaborative efforts to ensure digital safety.

UKAS

Alastair Hunter from the United Kingdom Accreditation Service discussed the role of accreditation in building trust in age assurance systems. He highlighted UKAS's activities and its efforts to develop accreditation for conformity assessment bodies.

CONSEIL DE GOUVERNANCE NUMÉRIQUE
DIGITAL GOVERNANCE COUNCIL

Keith Jansa introduced Canada's plans for national standards on age verification technologies, emphasizing international collaboration and the importance of protecting children online. Iain Corby concluded the day with a presentation on IEEE 2089.1, a standard for online age verification.

Keith Jansa

Iain Corby

The day also included sessions on child rights, GDPR compliance and digital standardization. Joy Tan from the British Standards Institution provided insights into the UK's digital standardization program and invited participation in standards development.

Emma Day discussed the relevance of the UN Convention on the Rights of the Child and UN Guiding Principles on Business and Human Rights, emphasizing technology companies' duty to protect human rights. She highlighted due diligence, stakeholder engagement, risk assessment and the need for balanced age assurance tools.

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"It's been our pleasure to welcome and host such a diverse range of organisations for this truly global summit."

Tina Henderson | *Chief Operating Officer* | *Age Check Certification Scheme*

ISO/IEC JTC 1/SC 27/WG 5

What's the ISO Meeting All About

The UK's National Standards Body, the British Standards Institution, was delighted to welcome the plenary meeting of ISO/IEC JTC 1/SC 27/WG 5 to Manchester.

BSI has led the development of age assurance standards, firstly with the PAS 1296:2018 - Code of practice for online age checks; then through supporting the work item proposals that have established ISO/IEC 27566 - Age assurance systems - Framework.

We're also delighted that Tony Allen, a UK Subject Matter Expert on Age Assurance, Digital Identity and Age Appropriate Design, is leading this project through the standards development process.

What's on the Agenda

Prof. Dr. Kai Rannenberg, Convenor of Working Group 5 (WG5) under ISO/IEC SC 27, guided delegates through discussions on standards and standardization projects from functional, management and regulatory perspectives, along with future development plans.

WG5 focuses on security, cybersecurity and privacy protection and, as of February 2024, comprises 55 participating and 35 observing countries, 311 projects (with 71 under development) and 240 published standards.

Discussions included key frameworks like ISO/IEC 24760 (Identity Management), ISO/IEC 29100 (Privacy Framework) and ISO/IEC 29101 (Privacy Reference Architecture), as well as guidance on authentication standards such as ISO/IEC 24761 and ISO/IEC 29115.

The group explored identity management systems and role-based identities, which enhance privacy and security by allowing users to present appropriate identities in different contexts. They also explored the benefits of unified identities for simplifying administration and customer relationship management through single-sign-on solutions. WG5's ongoing work will continue to address global challenges and cultural learning in identity and privacy technologies.

Interview with Dan Palmer, Associate Director of Committees at BSI

Prof. Dr. Kai Rannenberg *(right)*
Jan Schallaböck *(left)*
ISO/IEC JTC 1/SC 27/WG 5 convenors

ISO/IEC 27566 – Age Assurance Systems – Framework

Summary: Status at the beginning of the Summit

ISO/IEC 27566 is the suite of international standards that will cover the characteristics of, implementation of, privacy and security objectives for and the conformity assessment of age assurance systems.

At the beginning of the Summit, two documents had been prepared and circulated with a call for contributions:

ISO/IEC 27566-1 - Age assurance systems - Part 1: Framework, was at its second iteration as a working draft. More than 300 comments had been received for consideration, debate and discussion in the workshops and plenary sessions in Manchester. The hope and aim was to progress this document to a Committee Draft stage for circulation to the National Standards Bodies of each member of ISO.

ISO/IEC 27566-2 - Age assurance systems - Part 2: Benchmarks for benchmarking analysis, was at an early stage in its first iteration of a draft. Again, around 250 comments had been received on this draft and the aim at Manchester was to progress a further working draft for comment.

A third document was also proposed - a new Part on dealing with technical infrastructure and guidance. The aim with this proposed Part was to get it established as a project and an early draft circulated.

Take a look on **page 84** where we describe the status of these documents at the end of the Summit.

Mark Svancarek
US, Co-Editor ISO/IEC 27566 Age assurance systems - Framework

DAY 1
Breakout Sessions

The Global Age Assurance Standards Summit tackled pressing issues surrounding ISO/IEC 27566 standards, focusing on defining age assurance, methodologies for age verification, visualization techniques, benchmarking and indicators of confidence.

Sticky Issues: ISO/IEC 27566 - Definition of Age Assurance

Participants engaged in defining age assurance, contemplating terms like "age verification" "age control" and "age surveillance" Questions explored implications, alignment with standardization goals, impacts on public perception and legal considerations.

Sticky Issues: ISO/IEC 27566 - Indicators of Confidence

Participants debated the practical implications of setting classification accuracy thresholds for different levels of confidence in age assurance systems. Topics included performance metrics, false accept/reject rates, regulatory compliance, privacy concerns and the necessity for standardized methodologies and guiding principles. Delegates underlined the importance of being able to distinguish between different approaches to age assurance through conformity assessment.

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Sticky Issues: ISO/IEC 27566 Credentials

The session delved into defining various types of credentials for age verification:

- Primary Credentials: Official documents directly from authoritative sources.
- Auxiliary Credentials: Supporting evidence corroborating primary credentials.
- Secondary Credentials: Alternative forms used when primary credentials are unavailable.
- Inferred Credentials: Derived from indirect indicators.

The discussion highlighted the merits and drawbacks of each type, prompting debates on their inclusion in the standard. Key questions explored advantages, reliability, privacy concerns, cost considerations, the role of technological advancements and cultural differences.

ISO/IEC 27566-3 Scope Discussion

The meeting focused on outlining content for Part 3 of ISO/IEC 27566, addressing interoperability, technical architecture and guidelines. Participants proposed suggestions for inclusion, emphasizing collaborative and inclusive standard-setting.

Sticky Issues: ISO/IEC 27566 - Progressive vs Cumulative Assurance

The session scrutinized sequential verification steps, debating the merits of progressive versus cumulative assurance methodologies. Discussions delved into defining and differentiating the two approaches, advantages, scenarios of effectiveness, challenges and ethical implications.

Sticky Issues: ISO/IEC 27566 - Diagrams, Charts, Figures & Drawings

Exploring visual aids in ISO/IEC 27566 standards, stakeholders discussed the design and effectiveness of diagrams, flowcharts and illustrations. Considerations included design principles, inclusivity, cultural differences and stakeholder engagement in refining visual representations.

Sticky Issues: ISO/IEC 27566 - Benchmarking

The discussion centred on benchmarking analysis in ISO/IEC 27566-2, evaluating performance indicators, biases, test data sets, peer review processes and the balance between accuracy, usability and cost-effectiveness. Stakeholders emphasized the need for standardized methodologies, transparency and continuous evaluation. Some concern was raised that benchmarking may not be the right approach and underlining the critical importance of conformity assessment and independent 3rd party analysis of age assurance systems to build trust and confidence.

Sticky Issues: ISO/IEC 27566 - Biometrics vs Anthropometrics

The workshop delved into the distinction between biometrics and anthropometrics in age estimation technologies. Participants debated the ethical implications, privacy concerns and cultural influences associated with these methods. Key questions focused on the interchangeability of terms, ethical implications and the suitability of each method in various industries.

Sticky Issues: ISO/IEC 27566 - Security Objectives for Age Assurance

Discussions centred on security objectives for age assurance systems, covering topics such as identity theft prevention, resilience against attacks and regulatory compliance. The session explored the role of emerging technologies like biometrics and AI in enhancing security, as well as the need for user consent, awareness and transparency.

Sticky Issues: ISO/IEC 27566 - Consent, Awareness, Transparency for Age Assurance Activity

Participants explored strategies for user engagement during age assurance processes, focusing on consent, awareness and transparency. Discussions highlighted the complexities of obtaining informed consent, ensuring user awareness and promoting transparency while balancing regulatory compliance and user empowerment.

Sticky Issues: ISO/IEC 27566 - Untrackability, Unlinkability, Untraceability

The final session examined privacy-preserving technologies in age verification systems, including untrackability, unlinkability and untraceability. Participants discussed the contribution of these principles to privacy protection, technical measures for implementation and the intersection with regulatory frameworks and industry standards.

DAY 1
Other Sessions

Expert Input to ISO/IEC 27566

Denis Pinkas provided insights into the development of ISO/IEC 27566 standards, emphasizing the need to stabilize vocabulary and revise the scope based on emerging technologies. The presentation detailed architecture models for age verification and estimation, including PoCs and advancements in AI. It also addressed security, privacy and regulatory challenges. Denis was appointed a further co-editor of the ISO/IEC 27566 series during the Summit in Manchester.

ISO 42001: AI Management Systems for Age Assurance

Obi Udanoh discussed the relevance of AI management systems for age assurance service providers. Key points included certification requirements, bias mitigation and upcoming standards to ensure credibility and competitiveness.

The International Telecommunication Union (ITU) addresses child online safety through a globally coordinated approach, guided by key resolutions like Resolution 179, WTDC Resolution 67 and Council Resolution 1306. The Child Online Protection (COP) Global Program, led by **Honey Makola** and supported by Saudi Arabia, focuses on advocacy, research, country-specific programs and child participation.

From 2021 to 2024, ITU engaged 5,500 children and 1,700 parents in activities and helped 28 countries adapt guidelines to local contexts. The ITU Council's COP working group produces annual reports and facilitates exchanges, while ITU Study Group 17, which handles security and online protection, convenes biannually.

In March 2024, the Correspondence Group on COP was established to collaborate with stakeholders and address gaps in COP standards. The group's initial meeting led to an updated work plan and terms of reference, with a focus on identifying and analyzing deficiencies in existing international standards. Discussions have highlighted the challenge of balancing privacy measures, like encryption, with the need for child protection. Participants also placed emphasis on creating adaptable solutions for varying socio-economic and legal contexts. The group seeks comprehensive contributions to address new technologies and threats, particularly in virtual reality and aims to finalize a gap analysis and action plan by May 2024, underscoring the importance of collaborative efforts and this special meeting in Manchester.

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What else was happening on Day One

Behind the Scenes of the Summit

Hard at work throughout the week were our wonderful event crew from the Age Check Certification Scheme, the venues for our event, our photographer and videographer, our amazing audio visual team and our logistics and event support.

We were operating six concurrent sessions across all five days, with around 200 delegates in person and more than 400 joining the sessions online.

Preparing for the Summit Communique

One of our key objectives for the week was the preparation of a Summit Communique. There is more about this on **page 80**, but building on three months of open consultation on the draft text in advance of the Summit, working in partnership with the British Standards Institution, we were able to develop the text further in workshops and discussions throughout the week.

The BBQ

The famous Manchester rain gave us a short break at the end of day one - just enough time for us to host a barbeque to welcome our guests and delegates on the Terrace of the Studio venue overlooking the vibrant skyline of the city.

verifymy

"VerifyMy are pleased to be sponsoring this delegate reception. Our mission is to provide frictionless, trustworthy solutions for online platforms to maintain their integrity, protect their reputation and safeguard their users."

Michal Karnibad
CEO
VerifyMy

verifymy

Interview with Tom Hodgson
Chief Commercial Officer
of VerifyMy

Video Interviews

We invited some of our guests to provide a short interview explaining why age assurance standards are important to them and what they wanted to achieve by attending the Summit. Some of our interviews are provided on links elsewhere in the document; however, here are a few more not referred to elsewhere.

"I've been able to meet with industry professionals and talk about collaboration, info-sharing, new inventions and new technologies."

Dannii Hadaway
Co-founder & CEO | *IDGO*

"This subject will grow, as evidenced by the hundreds of people at this event and when it comes to billions of checks being done every day, which will happen, the question becomes 'what happens with that data?'"

Ana Pricop & Zvezdin Besarabov
Co-founders | *Outdid.io*

"This is an invaluable opportunity to share our guiding principles on age assurance to have frank conversations about this technology."

David Sullivan | *CEO*
Digital Trust & Safety Partnership

"The biggest barrier to this at the moment is not the standards themselves, but the legislation that needs to change to permit digital proof of age."

Kelly Moss | *Head of Regulatory Affairs* | *WSTA*

"The challenge is going to be how do democratic governments influence those international standards and keep a democratic control over the approaches to age assurance."

David Crack
Chairperson
CDD Services

DAY 2

9th April 2024

Driving Improvement

Exploring the role of regulators fostering compliance

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Bird & Bird

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DAY 2

On the Main Stage

Day Two of the Summit began with a visit to Australia and close up on the complex regulatory frameworks around age verification processes in Europe and beyond. The main stage sessions delved into the importance of international collaboration in realizing the potential of digital identity solutions for age assurance and creating a digital world that is committed to the protection of children's privacy and data online. Delegates gained a deeper understanding of the changing EU and international landscape for children's digital rights as well as the need for a coordinated approach to regulation.

eSafety Commissioner

Kelly Tallon provided insights into Australia's roadmap for age verification and the work of the eSafety Commissioner in protecting children online. The discussion emphasized the need for a harmonized approach across platforms and the challenges of age verification in different contexts.

We were delighted to welcome two members of the UK House of Lords to present at the Summit.

PASS

Baroness Anne McIntosh discussed the evolution of the Proof of Age Standards Scheme in the UK and its role in supporting various sectors. The session highlighted the importance of age assurance in online safety and the challenges and potential of new AI models. **Mel Brown** discussed the development of digital proof-of-age in the UK and its implications for age verification in retail and hospitality. The session highlighted the trend towards digital IDs and the need for privacy-preserving solutions. Kelly Moss introduced the Retail of Alcohol Standards Group and its efforts to promote responsible alcohol retailing through the Challenge 25 policy. The session discussed age verification solutions and challenges in both physical and online retail environments.

Baroness Anne McIntosh

Kelly Moss

Mel Brown

5RIGHTS FOUNDATION

Baroness Beeban Kidron outlined the importance of global regulatory standards for age assurance and children's rights in the digital environment. She emphasized the need for collaboration and discussed her work in establishing standards for online safety and privacy.

CNIL.

FSM Freiwillige Selbstkontrolle Multimedia-Diensteanbieter

aepd agencia española protección datos

Antoine Gaume

Martin Drechsler

Marta Beltrán

In Europe, Antoine Gaume from CNIL discussed privacy-preserving approaches to age assurance systems and proposed solutions to ensure privacy while verifying age. The session focused on GDPR principles and the challenges of obtaining age information online. Martin Drechsler presented Germany's approach to age assurance regulation, emphasizing compliance with GDPR and state-of-the-art data protection. The session discussed the challenges and guidelines for age verification in online content and the need for flexibility in regulatory standards. Marta Beltrán outlined Spain's proposals for age assurance to protect minors from inappropriate online content. The session discussed privacy-preserving mechanisms and compliance with GDPR principles.

Bird & Bird

Anna Morgan provided an overview of the international children's rights framework and its influence on EU laws for children's digital rights. The session emphasized compliance with EU regulations and the importance of protecting children online. A panel of experts explored the intersection of GDPR transparency obligations with age assurance requirements. They discussed the challenges of achieving transparency without circumventability and emphasized the importance of user understanding and communication.

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Emily Keaney from the ICO discussed the ICO's strategic approach to age assurance regulation and its commitment to protecting children's privacy online. The session highlighted regulatory cooperation and the importance of privacy protections in age verification. **Michael Murray** provided updates on the ICO's formal opinion on age assurance and the Children's Code. The session discussed compliance requirements and the ICO's role in ensuring data protection standards. **Jennifer Dolan** from the Irish DPC discussed the DPC's approach to children's data protection and its implications for age assurance. The session emphasized transparency, data protection and the need for a risk-based approach.

Emily Keaney

Michael Murray

Jennifer Dolan

Regulatory cooperation between ICO & Ofcom

Mashilo Boloka discussed the regulatory efforts of the Films and Publications Board in South Africa to ensure age-appropriate content and protect children online. The session emphasized compliance with relevant laws and the need for a national framework for age verification.

DAY 2
Breakout Sessions

John Cassin, Lynsey McColl and Rhianne Kiddle led a session aimed at collating the insights, comments and feedback gathered from Monday's 'Sticky Issues' sessions and stations. The goal was to compile these inputs into a report for submission to BSI's Age Assurance Standards Panel meeting. The session involved organizing and synthesizing the various discussions and ideas generated during Monday's sessions to identify common themes, key challenges and potential areas for further exploration or action.

LGfL

Voice Of The Child: 'If I Were A Regulator'

Mark Bentley from the National Grid for Learning led a session discussing online safety in schools, focusing on age and identity verification. The workshop highlighted challenges in verification processes, parental controls and inconsistencies in online behaviour. Using young people's perspectives, the discussion explored potential solutions to improve online safety, emphasizing age-appropriate platforms and the importance of addressing age and identity in online interactions.

Session on BS EN 17926:2023 - PIMS & GDPR

Sarah Carr, Alastair Hunter and Jon Ingle led a workshop session exploring the implications of BS EN 17926:2023 on certification for privacy information management systems (PIMS) and Art.42 certification under GDPR. The discussion delved into how the standard relates to GDPR compliance and certification processes. Topics included the scope of certification, the applicability of various standards (e.g., ISO 27001, ISO 27701) in the European context and the need for additional requirements specific to the UK. Participants discussed challenges in implementing these standards and the evolving status of privacy information management systems.

UK: Age Assurance as a new Area of Accreditation under ISO Accreditation Standards

Alastair Hunter and **Alan Webb** facilitated a discussion following the recent call for expressions of interest from UKAS on delivering a new area of accreditation for age assurance systems. The meeting brought together interested parties to explore the implications and potential opportunities associated with accrediting age assurance systems under ISO standards. Topics included the criteria for accreditation, the role of UKAS in this process and the benefits of standardized accreditation for age assurance systems. Participants discussed the need for clear standards and guidelines to ensure consistency and reliability in age verification processes.

"UKAS are here at the Summit to make sure that we understand the age assurance market, its needs and the challenges that it faces."

Alastair Hunter
Accreditation Specialist (Digital) | *UKAS*

Demonstration of Public Key Directory (PKI) Enabled Interoperability for Age Verification

Philip Young and Paco Garcia led a session exploring the potential for multiple providers of digital age assurance to be universally accepted through a Public Key Directory (PKD) infrastructure. Paco introduced the concept of a PKD and demonstrated its functionality for verifying the authenticity of digital proof of age. The system allows approved issuers to sign data with private keys, generating a QR code that can be verified by any website or point of sale. The session discussed the system's interoperability, privacy features and global applicability, highlighting its potential for facilitating age verification processes.

UK: Age Assurance in the Scottish Devolved Administration

Ken Daly discussed how age assurance has been addressed in Scotland and explored how devolved administration affects the consistency of age assurance measures. He highlighted the role of the Scottish Society of Training Standards (SCOTSS) in coordinating enforcement efforts related to age verification policies, particularly for tobacco, alcohol and vaping products. The discussion focused on Scotland's implementation of age verification policies, funding agreements for testing age assurance systems and penalties for non-compliance. It also addressed the enforcement activities of local trade and standards services, emphasizing coordination and engagement with retailers and government authorities.

US: Legal and Policy Challenges to Age Assurance Frameworks in the United States

Suzanne Bernstein and Mark Roberts discussed the legal and policy challenges to age assurance frameworks in the United States, stemming from the complex interplay between federal and state regulations. The session covered varied state laws regarding age verification, evolving digital privacy legislation and the lack of a unified federal standards for age assurance. The discussion emphasized the need for a nuanced approach that respects regulatory requirements and individual privacy rights while fostering trust in age assurance frameworks. Topics included recent developments in children's online privacy laws, ongoing legal challenges and proposed solutions.

Ofcom Presentation on the Guidance for Providers of Pornographic Content and Ofcom's New Duties under the Online Safety Act 2023

Annie Lyons from Ofcom presented on the Online Safety Act 2023, outlining Ofcom's new powers and duties. The workshop discussed baseline standards, compliance and industry improvements aimed at creating a safer online environment. It also addressed age assurance measures, emphasizing technical accuracy, robustness and fairness in online safety efforts.

Julia Cooke and Annie Lyons from Ofcom, along with Michael Murray from ICO, discussed the legislative framework for age assurance in the UK. The workshop highlighted collaborative efforts between Ofcom and ICO, focusing on age assurance measures under the Online Safety Act and GDPR. It emphasized transparency, accountability and international cooperation in regulatory approaches.

Regulatory Coordination of Age Assurance across Local Borders in the UK

Iain Corby facilitated a discussion on primary authority and age verification technologies. Speakers shared insights on regulatory partnerships and managing different regulatory regimes internationally. The workshop emphasized coordinated efforts between technology providers and trading standards organizations.

Age assurance providers & GDPR accountability

Shauna Joyce, Katerina Tassi and Julie Dawson led a session on GDPR accountability for age assurance providers. The workshop addressed challenges in age verification, cybersecurity certifications and third-party data sources. It emphasized the need for standardized approaches, transparency and risk-based solutions.

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"It's been fabulous to get such a broad range of regulators in the child safety online community together on such an important topic."

Anna Morgan | *Partner*
Bird & Bird

Global: New, Approved & Emerging Methods of Age Assurance

Voice Analysis

Obi Udanoh led a workshop exploring emerging age assurance technology and ethical considerations. The three experts on this panel in turn described how their innovative solution works. Deepak Tewari, CEO of Privately, outlined their privacy-preserving solution as analysis of an individual's voice via device microphone and then providing them with an instant age estimation based on their voice patterns and tone.

E-Mail Digital Footprint

Lina Ghazal, Head of Regulatory & Public Affairs at VerifyMy, described their method as using your email address to estimate your age, by reviewing sites and apps where you have previously used the email address. She explained that this solution is compliant with all data privacy requirements and the address isn't used for any other purpose than to estimate age.

Electrocardiogram (ECG) Analysis

The final method was described by Azfar Adib, a doctoral candidate in Concordia University's Department of Electrical and Computer Engineering. This electrocardiogram method works by measuring and analysing electrical signals emitted by the heart. These signals are distinct and differ with age; so younger hearts are shown to beat faster than older hearts and thus age can be estimated from this.

What else was happening on Day Two

UK: OPSS Expert Panel - Age Restrictions

Ken Daly chaired a special meeting of the Office for Product Safety & Standards (OPSS) Expert Panel focused on age restrictions. The meeting, which was open to all delegates at the Global Age Assurance Standards Summit, discussed the Tobacco and Vapes Bill recently introduced in the House of Commons. Gillian Golden, CEO of the Independent British Vape Trade Association (IBVTA), outlined the key provisions of the bill, which aims to implement strict regulations regarding the sale of tobacco and vaping products. These provisions include prohibiting the sale of tobacco products to individuals born after January 1, 2009 and the distribution of vaping products to individuals under 18. The discussion also covered regulations on vaping product packaging, contents and marketing, as well as proposed extensions to these regulations for nicotine products.

PASS Board Meeting

Baroness Anne McIntosh of Pickering and **Mel Brown** convened a private board meeting for the Proof of Age Standards Scheme (PASS). This meeting was restricted to members of the PASS Board and invited guests. The agenda included discussions related to the governance, strategic direction and operational matters of the PASS scheme. Topics included updates on current initiatives, upcoming projects and any challenges or opportunities facing the PASS scheme.

Discussion Group for Tech Providers and euCONSENT v 2.0

Iain Corby and Alastair Graham led a discussion on the alignment of IEEE 2089.1 and ISO 27566, focusing on the use of tokens for age verification and consent management for online services. Participants discussed token duration, data minimization and engagement minimization in age verification processes. They also addressed the complexities of anonymizing service data and proposed the use of an independent, open-source database to store tokens. The session emphasized the need for a trust framework to ensure system integrity and transparency in age verification processes.

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DAY

10th April 2024

3

Reducing Risk

Exploring the technical threat vectors to age assurance efficacy

DELEGATE LUNCH SPONSOR

veratad

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DAY 3

On the Main Stage

Day Three of the summit focussed on reducing risks associated with age assurance technologies including regulatory compliance, security threats and the importance of inclusive and trustworthy systems. Each session contributed valuable insights into the ongoing efforts to develop robust age assurance frameworks that prioritize user privacy, security and regulatory compliance.

VerID

Day Three started with Roger Olivera and **Annabel Gillham** presenting Ver.ID's approach to gaining verified parental consent using decentralized identity solutions. They discussed the use of digital ID wallets and zero-knowledge proofs in the Netherlands to address data protection concerns. The presentation showcased a prototype system designed to verify a user's age and obtain parental consent, emphasizing the importance of certified digital wallets and AI in age verification.

euCONSENT

Iain Corby and John Carr OBE provided an update on the euCONSENT project, aimed at enhancing online age verification and parental consent compliance with GDPR requirements. The project seeks to create a platform allowing users to choose multiple age verification providers across different websites. They discussed achievements, challenges and future plans, including technology improvements and integration with EU digital identity wallets.

Then Alastair Graham discussed the development of privacy preserving solutions that can work online, on device and in conjunction with the EUDI wallet. He highlighted the commercial aspects of services distribution models and proposed using age estimation technology within a mobile app.

Tony Allen discussed the development of interoperability standards under eIDAS for age assurance. The development and progress of the euCONSENT program was discussed, emphasizing the importance of a trust framework provided by audit and certification. Updates on the work within the euCONSENT program, standards, audit and certification were provided, along with discussions on key deliverables, standardized age verification across the EU and challenges related to parental consent.

TRUST ELEVATE

RegTech for Data Handling

Dr. Rachel O'Connell highlighted the importance of verifiable parental consent and identity standards in online systems, particularly for children. She discussed collaborations with various organizations to address complex issues and ensure compliance with global data protection laws. The session also touched on legal circumstances related to age and consent.

CITIZENCARD

Andrew Chevis discussed identification issues in the UK, particularly for demographics lacking photo ID. He introduced PASS cards and emphasized the need for a trusted vouching process as digital IDs become more prevalent. Andrew also introduced a free API for checking the validity of PASS cards and encouraged others to offer their users free PASS cards.

UNIVERSITÉ Concordia UNIVERSITY

Azfar Adib explored the potential use of ECG analysis for age estimation, highlighting data collection plans and challenges. The session discussed the security implications of biometric options for age verification. Pavel Korshunov discussed research on deepfakes and video injection attacks, emphasizing security implications for age assurance systems. The session highlighted ongoing efforts to address fraud detection and the creation of synthetic media.

Azfar Adib Pavel Korshunov

NIST

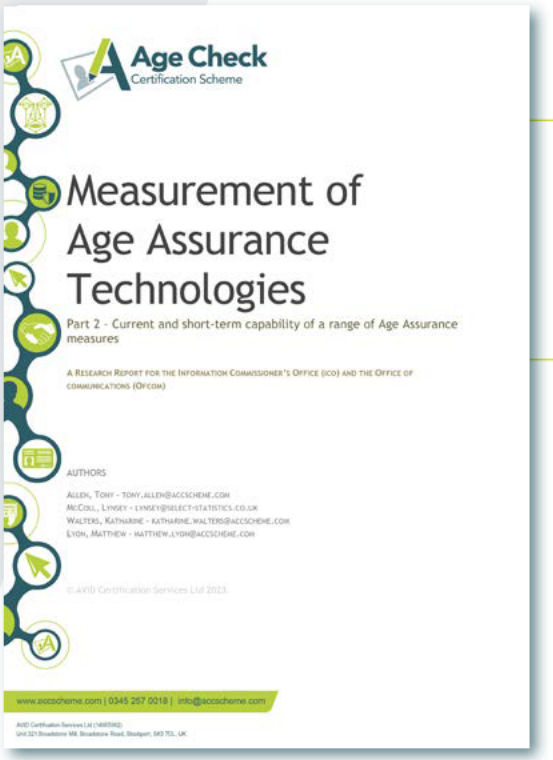
In a main highlight of the Summit, Patrick Grother presented the results of NIST's analysis of facial age estimation technologies. He discussed the development and potential applications of age estimation algorithms, emphasizing the importance of considering demographics and continuous improvement.

bsi

Sahar Danesh discussed BSI's role in developing age assurance standards and its benefits for policymakers and regulators. The session emphasized inclusivity, sustainability and future-proofing in standards development.

OIX OPEN IDENTITY EXCHANGE

Nick Mothershaw explored age assurance as an attribute of identity verification, highlighting OIX's approach and collaborations. The session discussed trust frameworks, digital identity and the need for further standards in validation methods.



Part 1 Part 2

Age Check Certification Scheme

Lynsey McColl and Tony Allen presented research commissioned by Ofcom and ICO on age assurance systems' efficacy. The session explored biometric analysis, testing protocols and the importance of appropriate technologies for age verification.

KU LEUVEN

Martin Sas presented a study on age assurance and online safety for children at the European Parliament. The session highlighted potential risks and challenges in age assurance methods, emphasizing the importance of child protection and human rights.

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DAY 3
Breakout Sessions

Roundtable: Ofcom/ICO - Discussion on Age Assurance, State of the Art and Effectiveness

Facilitators: Michael Murray, Ian Deasha. This roundtable aimed to discuss what regulators can do to provide the best possible guidance for platforms using age assurance and those developing the technology. Specifically, the meaning of 'state of the art' in age assurance and data protection compliance, as well as the definition of 'highly effective' in online safety compliance, were focal points. Attendees shared insights and examples, aiming to improve understanding and guidance.

ISO: Data Visualisation for results of age estimation systems benchmarking

Lynsey McColl led a workshop on data visualization for the results of age estimation systems benchmarking, emphasizing the importance of visualization techniques like density estimates and box plots. Surya discussed the effective field of vision in age estimation systems and highlighted the significance of minimizing error and standard deviation. Challenges in data capture, algorithm limitations and the value of demographic considerations were also discussed.

Verifying Age without Compromising Privacy: Innovations and Challenges

Presenter: Sebastian Rodriguez presented a solution leveraging decentralized identifiers (DIDs), zero-knowledge proofs (ZKPs) and liveness checks to verify age without compromising privacy. This novel framework prioritizes user privacy using DIDs to nullify traceability across applications, ZKPs to verify age without revealing personal data and liveness checks to prevent fraud. The presentation delved into technical aspects, implementation challenges, regulatory considerations and industry collaboration.

ISO: Measurement and Benchmarking: Binary vs Ternary Outputs from Age Assurance

Presenters: Surya Ramessh, Lynsey McColl. The workshop explored simplifying output indicators for age assurance systems, considering proposals for binary or ternary outputs. Discussions revolved around the use of confusion matrices for performance measurement, handling inconclusive results and the choice between binary classifiers or age gate systems. Transparency, inconclusive results and the importance of examining false negatives in detail were emphasized. Attendees also discussed gaming the system, test data set selection and the challenges of minimizing false positives.

Google Workshop - Listen, Understand, Implement - How Research Shapes the Implementation of Age Assurance

Presenters: Philipp Greitsch, Anja Dinhopl. The workshop focused on how research influences the implementation of age assurance, exploring Google's approach to enhancing online safety through technological advancements. Discussions delved into the role of AI and cybersecurity in age verification processes and their impact on regulatory compliance.

Workshop: Development of AI & Cybersecurity Standards in securing the efficacy and fairness of age assurance approaches

Presenter: Dr. Matilda Rhode led discussions on developing AI and cybersecurity standards to ensure the efficacy and fairness of age assurance systems. Topics included security, privacy, regulatory compliance and the role of standards in enhancing age verification processes.

US: NIST Face Analysis Technology Evaluation (FATE) Workshops

Presenter: Patrick Grother. The workshop explored the outcomes of NIST FATE Research and its relevance to benchmarking and analyzing age estimation systems within international standards. Discussions focused on challenges in testing technology, balancing false positives and user friction, ensuring transparency and addressing legal and practical complexities in age verification technology. The effectiveness of age verification systems, including their ability to enable different access based on age, was likely a key topic of discussion.

Workshop: On Device Verification - Is this the answer?

Presenters: Alastair Graham, Iain Corby. This workshop introduced a solution for interoperable age verification based on the European eIDAS system, discussing the development of the Age Aware App to enhance privacy and provide a commercial model. The proposed system ensures secure, anonymous token issuance, a certification process for issuers and a fair fee distribution scheme. Discussions covered user preferences in identity verification, liability issues and the limitations of database verification.

Workshop: Age Verification using Zero Knowledge Proof

Presenter: Patrick Curry OBE. Building on the AV Zero Knowledge Proof (ZKP) presentation, this workshop identified business and functional use cases benefiting from privacy-preserving age verification (AV) using ZKP techniques. Discussions focused on data quality, reluctance to share information, authoritative sources for data, privacy-enhancing technologies and ongoing projects aimed at improving data validation and collaboration across sectors. The workshop proposed ZKP for data matching without exposure and emphasized the need for authoritative identity data sources.

The use of Age Assurance in the Automotive Industry

Speakers: Michael Hoedlmoser, **Daniel Warren,** Iain Corby, Mark Roberts. This session explored how age verification technologies are reshaping the automotive industry, from enhancing safety features to personalized driving experiences. Discussions covered adoption, challenges and future implications of age assurance solutions in vehicle access, usage monitoring and driver assistance systems.

DELEGATE LUNCH SPONSOR

"What an opportunity to meet up with friends and colleagues from the age assurance sector. Here I am chatting with the inimitable Robin Tombs from Yoti."

John Ahrens | *Chief Executive*
Veratad

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UK/Swiss Joint Innovation Project - DefAI

Deepak Tewari provided an overview of the 6 Workstreams of the ACCS/Privately Innosuisse Project. The presentation aimed to engage delegates in the project, fostering collaboration and sharing insights into ongoing initiatives. Then, throughout the day, the technical specialists from the project held a series of workshops.

Project DefAI

Workshop - Computer Vision & Modelling of Deepfake and Video Injection Attack Test Assets for Age Assurance Systems

Presenters: Pavel Korshunov, Surya Ramessh, Onur Yürüten

This workshop delved into the technical details of computer visioning and modeling of deepfake and presentation attack test assets. Speakers discussed potential threats to age assurance systems, the importance of defense mechanisms and the application of AI techniques like model compression. Privacy concerns, AI-based attacks and the importance of identity verification online were also addressed.

idiap RESEARCH INSTITUTE

Workshop - Development of Deepfake and Video Injection Attack Detection Tools

Presenters: Onur Yürüten, Deepak Tewari

The workshop explored Privately's work program for the UK/Swiss Joint Innovation Project, focusing on the development of detection tools for deepfake and video injection attacks. Discussions covered security patterns, minimizing data storage on devices and the sophistication of document fraud.

Workshop - Ethical and Inclusion Implications of Deepfake and Video Injection Attack Test Protocols

Presenter: George Billinge highlighted the ethical and inclusion implications of deepfake and video injection attack test protocols, emphasizing the need for tools to defend against such attacks. Discussions also covered dataset quality, recent regulatory agreements on AI and the DefAI project aimed at addressing AI-based attacks on remote identity technology.

Workshop - Threat Vectors for Age Assurance Systems – Industry & Tech Providers Threat Assessments

Presenter: Iain Corby, Pavel Korshunov. The session explored deepfake applications, image swap processes and the challenges associated with detecting convincing deepfake content. Discussions also touched on age assurance system management and the challenges of age verification and biometric systems.

Workshop - Evaluation and Benchmarking of Deepfake and Video Injection Attack Resilience by Age Assurance Systems

Presenters: Lynsey McColl, Onur Yürüten, Pavel Korshunov, **Surya Ramessh.** The workshop focused on analyzing and measuring the resilience of age assurance systems to deepfake and video injection attacks. Discussions covered benchmarking analysis and the presentation of data in evaluating system resilience.

These sessions provided valuable insights into the technical aspects, challenges and implications of deepfake and video injection attacks on age assurance systems, emphasizing the need for robust defense mechanisms and ethical considerations.

> "The DefAI project is ground breaking. I think we can all agree that if age estimation can simply be presented with a deepfake image to make a child look or sound older, its going to be pretty useless."

Deepak Tewari
Founder & CEO | *Privately SA*

DAY 4

11th April 2024

Tech Showcase

Diversity of age assurance solutions around the world

DELEGATE LUNCH SPONSOR

AVPA
The Age Verification Providers Association

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The Tech Showcase Reception

On the eve of our Tech Showcase, we welcomed delegates from age assurance service providers all over the world to the National Football Museum in Manchester. Our hosts Age Check Certification Scheme and Yoti provided insight to the multitude of approaches to age assurance technology and solutions.

Yoti has incorporated a multi-tech approach to offering privacy preserving choice for users to have their own trusted identity. We were delighted to showcase this tech at the National Football Museum in Manchester.

It was also a great opportunity for our Digital ID Connect partners, Lloyds Banking Group and the Post Office Limited to showcase how we're integrating this tech into daily banking and consumer experiences.

Robin Tombs
Founder & CEO | Yoti

National Football Museum

DAY 4

On the Main Stage

Day Four was all about the innovation and creativity of the age assurance sector. We were delighted to have worked with the Age Verification Providers Association to run a competition for service providers to showcase their technology. The twelve winners of the competition got to present on our main stage (interspersed by our key note speakers) and provide demonstrations at our tech pods throughout the day.

Digital Trust & Safety Partnership

David Sullivan shed light on the Digital Trust & Safety Partnership's work on guiding principles for age assurance technologies. The partnership aims to develop best practices through transparency and accountability, emphasizing risk assessment, user privacy, inclusivity and transparency in age assurance. The discussion highlighted the complexities of age verification and the importance of collective viewpoints in developing international standards.

Meta

Rachael Gallagher provided a global perspective on Meta's efforts to deploy age assurance solutions across platforms and services to enhance child protection. The keynote addressed Meta's strategy, product improvements and initiatives, including age verification processes and rating user-generated content for age-appropriateness.

European Commission

Robin Massart provided an overview of the legal and policy landscape within the EU for protecting minors online including the Better Internet for Kids (BIK+) Strategy and discussed the intended approach for age assurance and age verification. Collaborative projects working towards advancements in age-appropriate design and assurance were highlighted.

DAY 4

The Tech Showcase

IDGO
THE UK'S SAFEST SMARTCARD

Revolutionizing Age Verification and Payments Across Sectors

The Tech Showcase day at the Global Age Assurance Standards Summit kicked off with a presentation by Dannii Joyette-Hadaway, introducing IDGO, a pioneering dual-sided smartcard designed to reshape age verification and payments. IDGO offers synchronized proof of age, identity and contactless pre-paid functionality, aiming to streamline transactions and enhance accessibility across diverse sectors, including nightlife, public services and third-sector organizations. Dannii emphasized the card's potential to address the needs of individuals aged 18+ facing socio-economic challenges, promoting inclusivity and compliance.

outdid.io

Peeling Back the Layers of Privacy

Zvezdin Besarabov and Ana-Maria Pricop delved into the intricacies of privacy, debunking myths and resurrecting its lost meaning through technologies like Zero-Knowledge Proofs (ZKP). The discussion emphasized collaborative efforts among businesses to leverage each other's strengths, introducing Outdid's role in this landscape.

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LUCIDITI

Privacy and Choice

Philip Young and Ian Moody presented Luciditi's Digital Identity Platform, offering privacy-preserving solutions, including anonymous Age Assurance. The platform, applicable across various industry sectors, particularly addresses legislative requirements such as the UK Online Safety Act 2023. Demonstrations showcased how Luciditi's embeddable Age Assurance system provides effective age verification without disclosing personal data.

Innovative Technology
POWERING TRANSACTIONS AND INTERACTIONS

Edge Technology for Age Assurance

Christian Czeskleba introduced Innovative Technology's AI-powered biometrics range, aiming to protect minors in retail and gaming venues. The discussion covered Innovative Technology's products, including the 'My Checkout' standalone solution and ICU Lite integrated solution, emphasizing their application in preventing underage access and staff abuse.

Challenging Misconceptions Around Age Assurance

Julie Dawson led a session challenging misconceptions about age assurance, highlighting Yoti's Age Verification Service (AVS) and its role in offering age-appropriate experiences online. The session emphasized the importance of setting minimum requirements for age assurance solutions to create safe online environments across industries.

Bank-Verified Age Assurance

Adrian Field introduced OneID, a '100% digital' age verification and identity service leveraging Open Banking technology. OneID combines UK standards of age assurance with the DSIT identity framework, enabling users to prove their age or identity online without additional accounts or documents.

Age Assurance: Trust Secured, AI-Powered

Miguel Adan discussed Veridas' growth, vision for a secure online environment, in-house tech development, ethical AI use and data non-storage. He highlighted efforts to prevent underage gambling, the 'id wallet' for age verification, regulatory alignment and a passwordless, keyless future.

The Application of Age Verification in E-Commerce

Alastair Graham emphasized the importance of age verification in e-commerce, focusing on compliance, accuracy and user experience. Demonstrations showcased cascading and orchestration methods to minimize customer abandonment and maximize verified customers.

Addressing Children's Identity and Verifiable Parental Consent at Internet Scale

Denise Tayloe introduced PRIVO's compliance program, offering age gate services for verifying user ages and ensuring online safety for children. The session discussed PRIVO's framework for transparent age-appropriate notices, identity verification and consent management, emphasizing the importance of protecting children's online privacy.

Empowering Users Through Optionality

Tom Hodgson highlighted the importance of giving users a choice in age assurance solutions to accommodate diverse needs. VerifyMy's innovative methods, including proprietary email address solutions, were introduced, aiming to empower users while minimizing friction in the verification process.

PRIVATELY

Privacy by Design Age Verification & Online Child Safety Solutions

Deepak Tewari introduced Privately's privacy-preserving tech solutions, focusing on age estimation and online child safety. The session showcased Privately's digital age estimation solutions, emphasizing privacy by design and the use of Privacy Enhancing Technologies (PETs) to improve models locally on-device or on-browser.

TrustStamp

Biometrically Binding Age Credentials

Amy Kneale discussed TrustStamp's tokenization strategy for ensuring identity privacy and protecting minors. The session emphasized Trust Stamp's involvement in standards-making processes and the potential of using tokens for interoperability across industries.

DELEGATE LUNCH SPONSOR

"Our members have outdone themselves with this showcase of the breadth and quality of age assurance technology. Age assurance really can be done."

Iain Corby | *Executive Director*
Age Verification Providers Association

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DAY 4

Our Panel Debates

The panel sessions on Day Four of the Global Age Assurance Standards Summit delved into various aspects of age assurance technology, its applications across different industries and the challenges and opportunities associated with its implementation.

Role of Orchestration Service Providers in Age Assurance Platforms:

SPEAKERS: Christopher Gledhill, John Ahrens, Nick Mothershaw, David Crack

DISCUSSION: Explored the interface between the age assurance sector and acceptors or relying parties with the creation of orchestration service providers as middle ware. Emphasized potential growth opportunities, regulatory impacts and the role of AI. Discussed the need for a stable regulatory environment and how this middle ware can aid choice.

Age Assurance in ESG, Non-Financial Reporting and Risk Management:

SPEAKER: Tony Allen

DISCUSSION: Explored corporate commitments to reducing minors' access to products, age-appropriate solutions and enhancing children's online experiences. Linked these concepts to Environmental, Social and Governance (ESG) reporting, risk analysis and age assurance deployment strategies.

Accreditation: Building Trust and Confidence in Age Assurance Technology:

PANELISTS: Deepak Tewari, Delme Stephenson, Patrick Grother, Obi Udanoh, Alastair Hunter

DISCUSSION: Debated the role of accreditation in securing trust and confidence in age assurance technology. Explored how accreditation benefits industry and market audiences, fostering credibility and reliability in age verification systems.

Inward Investment – Securing Funding for Age Assurance Eco-System:

PANELISTS: Paula Sussex, Robin Tombs, David Sullivan, Nick Bate

DISCUSSION: Explored challenges in gaining external funding and inward investment in the age assurance ecosystem globally. Discussed strategies for attracting investment, overcoming barriers and fostering growth in age assurance technologies.

Gambling: Age Assurance for Player Safety and Responsible Gambling:

PANELISTS: Wes Himes, Keith Ferguson, Alastair Graham, Peter Hannibal

DISCUSSION: Explored the role of age assurance in securing player safety and promoting responsible gambling. Addressed challenges in age verification for online gambling, regulatory developments and industry initiatives to prevent underage access to gambling platforms.

Advertising Industry: Impact of Age Assurance on Advertising Revenue:

PANELISTS: Andrew Taylor, Phil Smith, Laura Brodie

DISCUSSION: Examined the potential impact of age verification technology on online advertising revenue and user experience. Discussed the importance of certified age-assured audiences, responsible advertising practices and evolving advertising models.

Reducing Youth Access to Vape & Reduced Risk Non Combustible Nicotine Products

PANELISTS: George Billinge, Dan Marchant, Liam Humberstone, Eve Peters

DISCUSSION: Explored vaping regulations and health impacts; Stressed distinguishing between legal and illicit markets, enforcing regulations and addressing advertising's influence. Raised concerns about youth access and age verification challenges were discussed, urging better education and interventions.

"This has been a fantastic event which has brought together two distinct groups: people looking at standards and those innovating around technology. It's rare to get those people in the same room."

Nick Mothershaw
Chief Identity Strategist | *OiX Open Identity Exchange*

DAY 4
Breakout Sessions

Meta Workshop on Family-centric Approaches to Age Verification

Adam Bargroff led a workshop exploring design-led considerations for age verification in family settings, focusing on parents/guardians and teens. Participants collaborated on various digital scenarios and age verification methods, reflecting on parameters such as privacy, safety, efficacy, equity and accessibility. The session aimed to gather shared learnings and aggregate insights for Meta's Trust, Transparency & Control Labs.

Transparency, Compliance, Consent & Trust: Introducing Consent by Design

Tim Reiniger, Paul Knowles, Sal D'Agostino and Mark Lizar facilitated a session on age assurance transparency, compliance and consent in light of data governance regulations. The session explored research into the unintended consequences of surveillance-based governance and introduced a consent by design, transparency and trust framework. The team behind this framework presented various components, including PII Controller Credential Notary Registrar Architecture, consent receipts and the Kantara ANCR Transparency Performance Scheme.

Matching Policy and Methodology in Age Assurance for Services Designed for Children

Adam Ingle from The LEGO Group led an interactive session discussing age assurance policy and methodology for services directed towards children. The session emphasized a risk-based approach, responsible innovation and Lego's commitment to compliance and design principles. Participants engaged in discussions about risk categorization, age-appropriate service features, parental consent and strategies for ensuring children's online safety.

Implementation of Digital Presentation of Proof of Age & Age Estimation for the Retail Sale of Alcohol in the UK

Iain Corby, Murray Williams, Ian Moody and Paco Garcia hosted a roundtable discussion on the implementation of digital age estimation and verification solutions in the retail sector. The team discussed the unique features of Yoti's solution, challenges of incorporating age verification technology and the importance of data privacy and security in retail settings. The discussion also touched on the development of a new PASS-enabled system for age verification.

What else was happening on Day Four

BSI IST 33/5/5 'Age Assurance Systems' Panel

The meeting focused on reviewing and confirming minutes, adopting amendments and discussing core principles for age-related eligibility decisions. Delegates highlighted challenges in confidence measures and interoperability. The meeting discussed challenges, benchmarking project progress and limitations of skin tone determination scales. They emphasized the need for diverse approaches, comparable data sets and clear definitions. Next steps include finalizing a document for the summit.

Chartered Trading Standards Institute: Business Members Group

Cases of trademark infringement, passing off and design registration were discussed, including the Thatchers versus Lidl case. They highlighted the importance of differentiation and design registration. Legal cases on product packaging and design were also examined. Additionally, vaping regulation and the forthcoming ban of single-use disposable vapes were discussed, emphasizing understanding compliance and public health implications.

The Cube Live

As we approached the end of the week, it was time for some relaxation with Tech Enabled activities at the Manchester Urban Playground. Some of our delegates took on 'The Cube Live' experience, whilst others pitted their wits against the mini golf courses.

Although we all had fun and games, none of our teams troubled the leaderboard for the night! Better luck next time.

EVENING EVENT SPONSOR

Meta

"Protecting children online is what helps me do my job at Meta and in turn it's Conferences like this Global Summit that seek to protect children in the digital world. The turnout of this Conference is testament to the variety of stakeholders that are actively working to solve this issue."

Rachael Gallagher | *Privacy Policy Manager* | *Meta*

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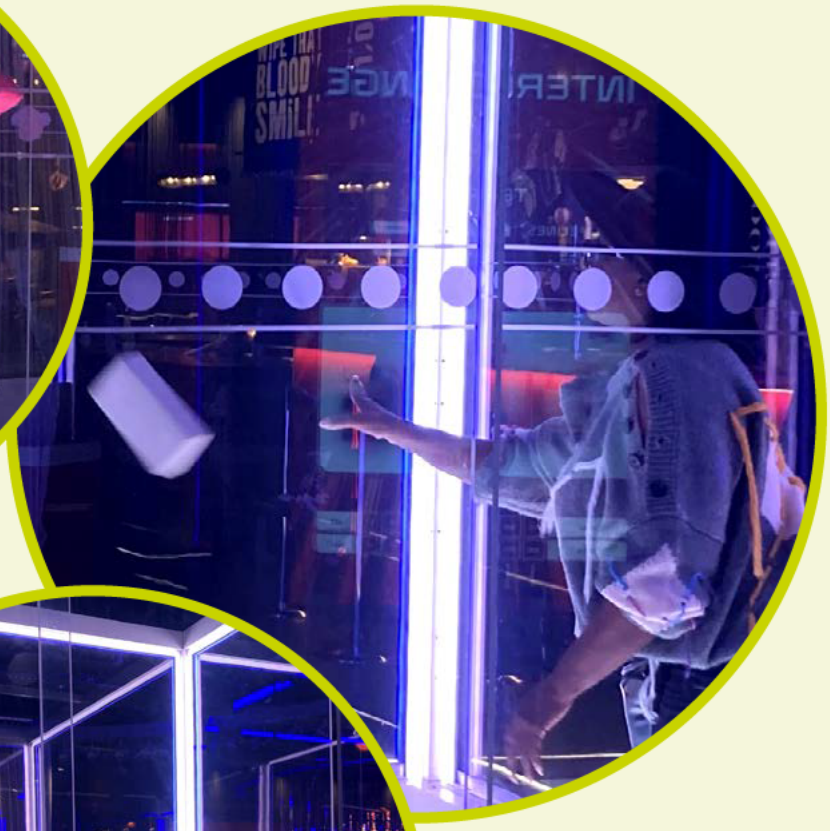

DAY

12th April 2024

5

Enabling a Safer Online

Views from civil society on why it's important to bother with age assurance

DELEGATE LUNCH SPONSOR

LUCIDITI

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DAY 5

On the Main Stage

Day Five focused on 'Why Bother?' An enormous amount of effort is being put in by platforms, services, tech providers and civil society seeking an age aware internet through approaches to age assurance. Why is it so important to tackle this issue for children in our digital world. The day was expertly compered by John Carr OBE, a global child safety campaigner.

Collective Shout

The day began with a keynote address by Melinda Tankard Reist, who shed light on the detrimental impacts of porn exposure on children in Australia. She highlighted the rise of adolescent-on-adolescent sexual abuse linked to mass exposure to pornography and advocated for age verification systems to protect vulnerable young people.

delay smartphones.
PROTECT CHILDHOOD

Hannah Oertel from Delay Smartphones discussed the negative effects of smartphones on children under 14 and proposed delaying smartphone usage until at least that age. The session emphasized building a movement to address this issue at the community and international levels.

W3C®
Accessibility for Children

Maud Stiernet's talk on accessibility for children with disabilities explored the importance of user-centric approaches and age-appropriate standards to ensure inclusion. The session emphasized the need for better tools, education and intersectionality in research.

Social Media Matters

Pratishtha Arora addressed the challenges of age assurance in India's digital landscape, focusing on issues like fake profiles, lack of child consent and rising cases of Child Sexual Abuse Material (CSAM). She advocated for legal frameworks, parental education and tech company initiatives to promote online safety for children.

PGI

Andy Briercliffe discussed age check avoidance and the challenges faced by platforms in tackling this problem, especially regarding social media where only the Date of Birth is required. The talk highlighted observations from the front line and proposed strategies for addressing this issue on a global scale.

select statistical services

Lynsey McColl's session on the value of statistics in age assurance showcased Select Statistics' projects and their role in testing the performance of age assurance technologies. Lynsey emphasized the importance of statistics in distinguishing between age estimation and verification.

Keynote Speaker

John Carr OBE's keynote address explored the necessity and effectiveness of age assurance measures. He emphasized the need for a balance between privacy and protection and called for global adoption and implementation of age verification measures.

MOLLY ROSE FOUNDATION

Andy Burrows discussed the tragic case of Molly Russell and the prevalence of self-harm and suicide content on social media platforms. He advocated for proactive measures to protect mental health and wellbeing, calling for regulatory and legislative changes.

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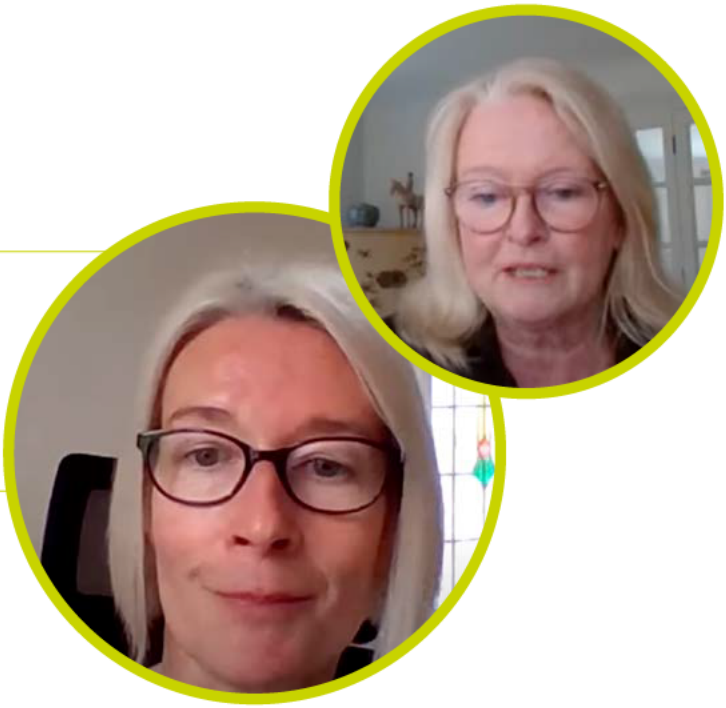


NSPCC

Julia Davidson's OBE session focused on the NSPCC's review of online risks and harms to children in the UK, highlighting the technological, social and political changes influencing children's online experiences. The presentation emphasized the need for ongoing evaluations of online safety legislation and increased funding in this area. Jo Bryce discussed key challenges and knowledge gaps in understanding children's online experiences based on the NSPCC Evidence Review. The session outlined implications for age assurance and emphasized the importance of research evidence in developing effective prevention and response actions.

Jo Bryce Julia Davidson

Google

The summit concluded with a closing keynote from Jennifer Debroni of Google, who discussed the company's efforts to create safer and more age-appropriate digital experiences for kids and teens. Google's approach focused on protecting, respecting and empowering young users to explore, grow and play online safely.

DAY 5
Breakout Sessions

Advancing Transparency and Rights: International Standards in Age Assurance Practices

The day began with a workshop led by Emma Day and Tony Allen, which highlighted the importance of international standards and the involvement of relevant stakeholders in ensuring transparency and respect for individual rights in age assurance practices. Participants emphasized the need for policy implementation, lessons learned and challenges faced, with a consensus on the UK government's role in reporting to international bodies. Additionally, discussions centred around initiatives related to child rights and harassment protocols, with an agreement to prioritize general principles of education, balance and protection in age verification processes.

Strategizing the Summit Communique: Structuring and Disseminating Action Plans

Subsequently, the Summit Communique Drafting Committee, led by Emma Day, Delme Stephenson and John Cassin, convened to review the structure and content of the Summit Communique. Debates ensued regarding the inclusion of names in the signatories list and strategies for effective dissemination to policymakers. The committee emphasized the importance of an action-based approach targeting elements from the UK and planned a follow-up meeting to finalize the communication strategy.

Bridging the Gap: Exploring Discrepancies in Online Behavior Expectations

Mark Bentley led an interactive session titled "Back To School for Online Safety" where he addressed the disparity between how young people are taught to behave online versus the actual behavior exhibited by adults, particularly in their own online conduct. He posed critical questions about the disconnect between offline and online behavior and explored the concept of a two-tier internet—how individuals often expect different standards of behavior online compared to offline, especially when it's convenient for them. The session aimed to provoke thought and discussion about where the current approach to online safety is failing and what steps can be taken to rectify this gap.

Participants were encouraged to engage in dialogue and share insights into how to bridge the divide between online and offline behavior expectations, particularly in educational settings.

Innovative Solutions for Online Child Safety: Exploring SecuriKey Technology

Kate Coleman presented "SecuriKey," a novel technology utilizing retinal photography and artificial intelligence to secure children online. Concerns raised regarding data collection were addressed and plans for a joint study were proposed, highlighting the ethical considerations in utilizing such technology.

Exploring Children's Privacy and Online Safety in Game Development

The discussion continued with a focus on children's privacy and online safety in game development, led by Luc Delany and Timothy Ma. Timothy highlighted global challenges in data privacy compliance, while Luc stressed the need for a global principle to protect children online, taking into account cultural differences and local laws.

Fostering Openness Online: Insights from the 'HowRUDoingOnline?' Campaign

A session on the "HowRUDoingOnline?" campaign, led by **David Moepeng**, **Jason Mahoney** and **Gary Conner**, addressed the growing sense of disconnection in digital interactions and proposed initiatives to foster openness about online experiences, particularly negative ones, to prevent online harms.

Examining Risks of Generative AI in the Online Sphere

Matthew Shardlow and **Alex Akinbi** discussed the potential harms of generative AI in the online sphere, highlighting the need for AI safety measures to combat risks such as deepfakes and voice cloning.

Parental Perspectives on Online Safety: Debating Age of Consent and Age Assurance Consent and Age Assurance

A panel representing parents of children affected by online harms, including **Andy Burrows**, **Hannah Oertel** and **Jo Morton-Brown**, debated the age of consent for smartphone and social media use and emphasized the need for age assurance to support parents in managing children's online activities.

Inclusion: Proof of Age for Young Adults leaving Care or Custody

Dannii Joyette-Hadaway, **Doreen White**, **Lucy Kettle** and **Mark Haines** explored the challenges young people face in proving their age and identity, especially those from care or custody. They addressed policy inadequacies, difficulties accessing services without ID and the potential of technology for inclusive verification. The panel called for better collaboration, streamlined processes and solutions ensuring accessibility, security and privacy.

Exploring the Psychology of Smartphones in Childhood and Age Verification Strategies for Young Adults

Darragh McCashin and **Megan Reynolds** discussed technology's impact on vulnerable populations, emphasizing the need for nuanced research and youth involvement in decision-making processes. Megan called for personalized policies on children's digital rights and highlighted the importance of experienced individuals' approaches. They also introduced an Irish study comparing the experience of schools with and without voluntary smartphone bans.

How could a privacy and anonymity preserving age assurance system work for users of all ages?

One of the final sessions of the day was led by Torsten Krause and Jutta Croll, who discussed challenges with age assurance in digital child protection. Torsten emphasized data minimization, privacy and anonymity, suggesting using existing registries and third-party verification for sustainability. Jutta stressed balancing children's protection from harm with a frictionless user experience and conducting risk assessments to determine the need for age verification.

"This week we've achieved the level of engagement and new business opportunities that it would've taken us a year to get."

Philip Young | *Co-Founder & CTO*
Luciditi

What the Summit Achieved

As many of the Summit achievements as we could fit in this Compendium have been brought together by our Policy and Regulation Specialist, Rhianne Kiddle.

© Age Check Certification Scheme

ISO/IEC JTC 1/SC 27/ WG 5 final plenary and debate

The concurrent ISO/IEC JTC 1/SC 27/WG 5 meeting held alongside the Summit concluded with a final plenary progressing more than 20 projects on Identity and Privacy Technologies. This included progress of ISO/IEC 27566 explained in more detail on **page 84**.

The Summit Communique

A "summit communique" is an official statement released at the conclusion of an international summit, summarizing the discussions, agreements and key resolutions reached by participants. It serves as a formal record of the summit's outcomes and intentions for future collaborative actions. It is widely used in international processes. Our aim is to get the document formally 'on-the-record' and to this end, we have also formally submitted a copy of it to Lord Cameron, the UK's Secretary of State for Foreign, Commonwealth and Development for submission through official channels to the UNCRC

One of our objectives for the summit was to prepare a statement of the current state of development of age assurance standards. This Summit Communique was developed by consensus among the participants through an open consultative process in partnership with the British Standards Institution. The Communique is open to be used by any interested party to communicate with stakeholders about age assurance. After the summit, the Communique was submitted to the Ann Skelton, Chairperson of the United Nations Convention on the Rights of the Child (UNCRC) by Summit attendee Jutta Croll from Stiftung Digitale Chancen.

Global Age Assurance Standards Summit

bsi

The Global Age Assurance Standards Summit between April, 8 2024 and April, 12 2024, a project supported by Safe Online has worked in partnership with the British Standards Institution (BSI) to bring together over 700 interested parties including governments, regulators, international organisations, civil society, academia, industry, age assurance service providers, standards developers and technical experts to prepare this communique to reflect the position, state of the art and development of age assurance standards as at April, 12 2024.

Headline

Age Assurance **can** be done.

Age Assurance **can** be deployed, with the right process for the right use cases, in a manner that is privacy preserving, secure, effective and efficient.

Age assurance **can** be a valuable tool amongst a range of measures deployed to protect children in the digital environment.

This would be assisted by securing **International Standards**, which are implemented and respected by providers of services that are required to make age related eligibility decisions.

Laws and regulations **can** create the legal framework with robust enforcement procedures in place to secure the protection of children from harm.

If deployed proportionately and effectively, Age Assurance represents an opportunity to enhance the fundamental rights of children in a digital age, in addition to protecting anonymity and the freedoms of adults to enjoy online goods, content and services.

Definition

Age assurance is the process of establishing, determining and/or confirming an age assurance attribute, including age verification, age estimation and age inference. [ISO/IEC CD 27566-1]

Disclaimer

This publication has been produced with financial support from Safe Online and organisational support from the Age Check Certification Scheme and British Standards Institution. However, the opinions, findings, conclusions, and recommendations expressed herein are those from the collective input of participants at the Summit and do not necessarily reflect those of Safe Online; the Age Check Certification Scheme or the British Standards Institution.

What People Had To Say About The Event...

"To me its really important to attend this Global Age Assurance Standards Summit because we can bring the community of the people who are preparing these standards together with the people who are going to use them."

Dan Palmer
Associate Director of Committees
BSI

"This Summit is a really key landmark in the evolution and maturity of the age assurance industry."

Julie Dawson
Chief Regulatory and Policy Officer
Yoti

"I'm thrilled to be here at the Summit. There's lots of scope in the trust and safety space for additional standards."

Dr. Rachel O'Connell
Founder and CEO
Trust Elevate Ltd
Technical Author PAS 1296:2018

"This event has allowed me to speak with all of the partners in the sector, discuss lots of what's going on in terms of standards and where the industry is heading."

Nick Bate
Chairman
Age Check Certification Scheme

"We have to be able to take what's happening in the real world and make sure standards reflect that."

Denise Tayloe
Founder & CEO
Privo

"This has been an incredible week and you get to meet so many passionate people who've got this desire to really want to help protect children and keep them safe. Its been brilliant."

Jo Morton-Brown
Founder
Flourish

The status of ISO/IEC 27566 at the end of the Summit

During a very busy week, substantial progress was made with the development of the ISO/IEC 27566 series of standards in line with our objectives. There is still plenty of opportunity to comment and further refine the drafts though as we head towards final publication, hopefully during 2025.

ISO/IEC CD 27566-1 – Age assurance systems – Part 1: Framework was progressed to 'Committee Draft' or CD stage. This means that, broadly, the working group have reached consensus on the contents and are now inviting the technical committees of individual national standards bodies to comment on the draft. This is usually the first opportunity that national bodies have to engage in the drafting process.

ISO/IEC PWI 27566-2 – Age assurance systems – Part 2: Technical approaches and guidelines for implementation. This was an important re-ordering of the number structure for the series with the old Part 2 (about benchmarking, see below) being made Part 3 and a new preliminary work item (PWI) being established to create a new Part 2 covering the technical approaches and guidelines for implementation. A new work item proposal (NWIP) was prepared, along with a first working draft and submitted for approval and circulation for comment.

ISO/IEC WD2 27566-3 – Age assurance systems – Part 3: Benchmarks for benchmarking analysis. Whilst some of the comments on the first working draft were considered, not all of them were addressed and there remains a lack of consensus on how to proceed with this Part. A second working draft has been prepared and together with a partial disposition of comments on the first working draft, will now be circulated for further comments.

ISO/IEC JTC 1/SC 27/WG 5 also concluded with an extension to the project team for these standards, in addition to the Project Editor, Tony Allen; two further co-Editors have been appointed – Denis Pinkas, France and Mark Svancarek, United States.

Next steps

The revised drafts of the ISO/IEC 27566 series will be circulated for further input and comments. These will be collated over the coming months and addressed in future meetings of ISO/IEC JTC 1/SC 27/WG 5. The aim is to have, at least, Part 1 published during 2025.

The Summit Communique will be submitted, via the United Kingdom's permanent delegation to the United Nations to the UN Convention on the Rights of the Child (UNCRC) as a part of regular updates. The Communique will be made freely available to all participants and any stakeholders to utilise in their internal and external reporting of the status of standards development.

Tony Allen gave his summary of the week in this interview.

The Summit Team & Thanks

The Global Summit Event wouldn't have been possible without the wonderful team at Age Check Certification Scheme. Thanks for all of your hard work and steely determination to put on a fabulous week for our global delegates. A special thanks to the team at the Age Verification Providers Association (AVPA) for their invaluable support with both planning and participation in the event.

Thanks also go to our photographer and videographer who worked around the clock to capture our esteemed speakers in action and doing what they do best. The event also wouldn't have been possible without the unwavering assistance of our colleagues at Universal Live, Iky Yacoob and Ian Dickson, who supplied the technology for the week.

We wouldn't have had the event without the wonderful venue; thank you to the team at The Studio, Manchester for all of your organizing, accommodating and tireless hospitality. Thanks also to our fabulous graphic designer at Sojo Creative, who created the materials for both the Summit Venue and this Compendium document.

Thanks again to Safe Online and all of our other sponsors for making the Summit financially viable and of course to all of the speakers, presenters and panellists who took the time out of their busy schedules to join us in Manchester and online for this groundbreaking event.
Thank you!

ACCS

Abbie Witkowski
Aishwarya Sharma
Danielle Bradbury
Drew Waddington
Bangxiang (Gary) Guan
Jon Ingle
John Cassin
Maddie Winterbottom
Obi Udanoh
Phoebe Stevenson
Rhianne Kiddle
Surya Ramessh
Tina Henderson
Victoria Gale

AVPA

Iain Corby
Rebecca Burgess
George Billinge
Mark Roberts

Photos & Videos

Josh Dorfman
Oliver Price

Universal Live

Iky Yacoob
Ian Dickson

The Studio

Zainab Warburton

Sojo Creative

Jo Carter

Global Summit 2024 Statistics

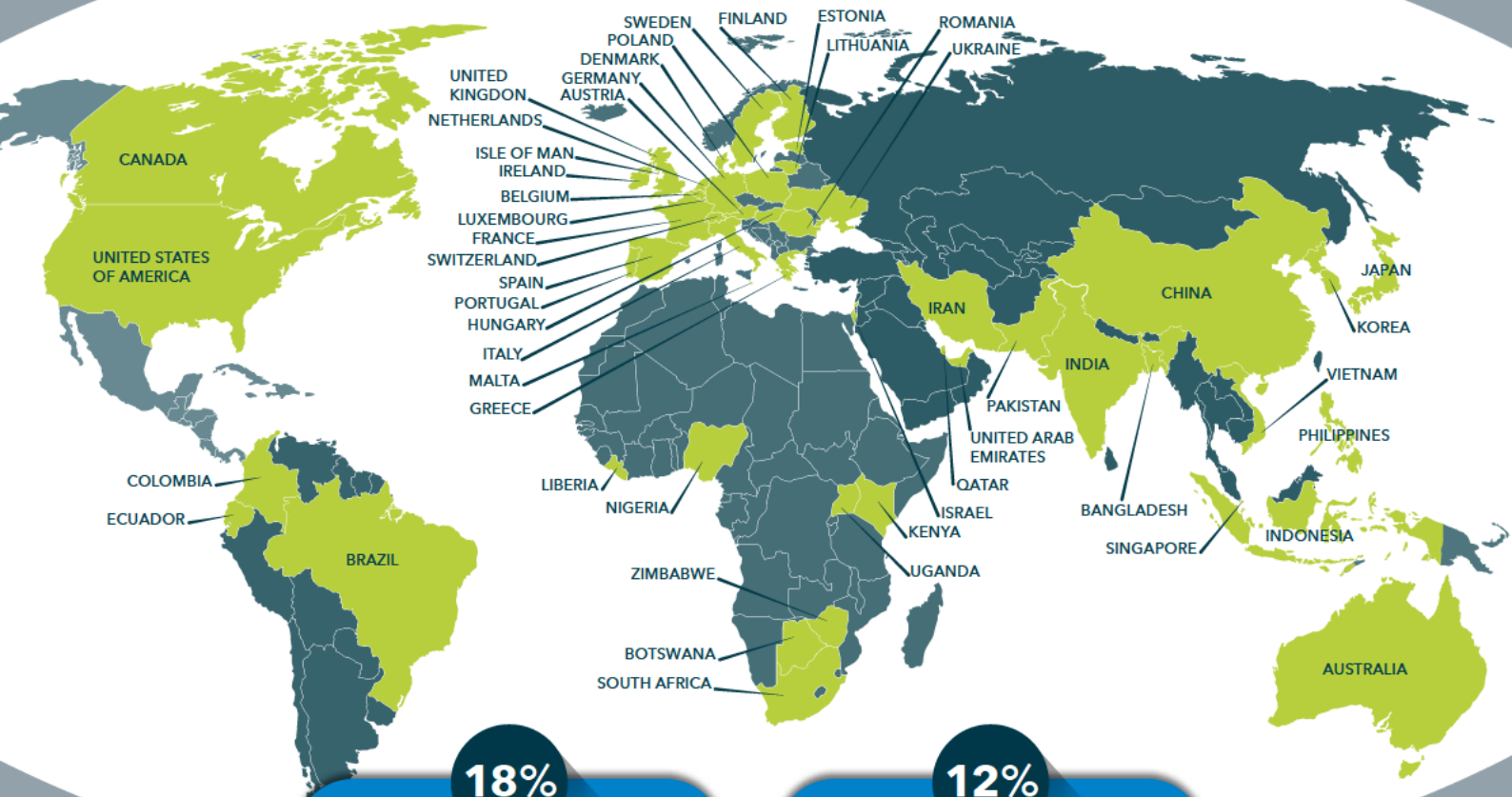
102 Expert speakers

709 Registered delegates

212 Attended in person

424 Attended online

Delegates from **53** countries



18%

of attendees were C-Suite

having the title 'Chief' 'Founder,' 'Director' or 'President'

12%

of delegates were from Governments or Regulators

119 delegates from **age assurance service providers**

74 delegates from **ISO/ IEC JTC 1/SC 27/WG 5 working groups**

37 delegates from **'relying parties'** or **'age assurance service users'.**

14 of the **Top 20 global online platforms** had representatives attending.

Over 9h

is the average time spent by attendees online at the event.

Over 77h

of videos of sessions, panels and debates

Peak online audience of 124 for the keynote address from Marija at SafeOnline

94%

of all attendees said they would recommend the event.

★ ★ ★ ★ ★

227 Sessions over **5 days**

22 Video Interviews of Delegates

Organiser's Digital files **1,921** over **341** folders!

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Visit us on social media...

@AgeCheckCert

Internationally recognised standards

Our scheme provides evidence that identity and age check practices meet international standards.

Highly qualified certification officers

Our locally trained certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check Certification Scheme

www.accscheme.com

Broadstone Mill, Broadstone Rd, Reddish, Stockport SK5 7DL, United Kingdom

sales@accscheme.com

(+44) 345-257-0018

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From: Age Check Certification Scheme <no-reply@events.ringcentral.com>
Sent: Thursday, 30 May 2024 3:38 AM
To: s 22
Subject: Compendium & Communique | Global Age Assurance Standards Summit 2024

Follow Up Flag: Follow up
Flag Status: Completed

Hi s 22

We have exciting news for you! Today we are publishing the final Compendium and Communique from the Global Age Assurance Standards Summit.

You can download and share the documents for FREE from the following links:

Global Summit Compendium- https://accscheme.com/wp-content/uploads/ACCS-GlobalSummit-Compendium-.pdf

Global Summit communiqué- https://accscheme.com/wp-content/uploads/ACCS-GlobalSummit-Communique-FINAL.pdf

The Compendium is a comprehensive collation of all of the sessions, slides, video recordings, interviews and materials gathered during the Summit. The Communique is a record of the 'state-of-play' with global age assurance standards by the end of the Summit.

We hope that you enjoy exploring the materials in both documents. Our grateful thanks once again to Safe Online, who provided project finance for this Summit and we're really hoping to be able to run something again in 2025!

Best Regards

Tony Allen

Chief Executive; Age Check Certification Scheme

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From: Julie Inman Grant
Sent: Wednesday, 12 June 2024 6:05 PM
To: s 47F @euconsent.eu
Cc: s 22 Tony Allen; s 22
s 22 @INFRASTRUCTURE.gov.au
Subject: Re: euCONSENT re Age Verification

Hello s and Tony - I'm so glad you had an opportunity to speak with s 22 . She likely told you that the Department will take forward the AV pilot, and I've copied s 22 , who is leading that work.

In the coming weeks, we will be moving forward with our Phase 2 industry codes (and will be sure to share with you). We are also part of the cross-government group put together by the Department so will continue our engagement that way.

It would be tremendous to be able to leverage your tremendous work and experience in this area.

And, if you do come down for a visit again, please reach out!!! Julie

Get Outlook for iOS

From: s 47F @euconsent.eu
Sent: Wednesday, June 12, 2024 5:37 PM
To: Julie Inman Grant
Cc: s 22 Tony Allen
Subject: FW: euCONSENT re Age Verification

Some people who received this message don't often get email from s 47F @euconsent.eu. Learn why this is important

Dear Julie
I just wanted to share with you that Tony Allen and I just had a really good call with s 22 , to brief her on euCONSENT, and the latest iteration of it – our AgeAware tokenized solution.
We obviously said we're keen to help but to as much or as little extent as you all deem appropriate. But as I mention in my cover note below, it would be great if Australia could lead the global effort to find an industry-wide solution.
Hopefully we can speak with the Department's team next.
All the best
s

From: s 47F @euconsent.eu
Sent: Wednesday, June 12, 2024 8:32 AM
To: s 22
Cc: Tony Allen
Subject: RE: euCONSENT re Age Verification
Dear s 22
Many thanks for your time and sorry to eat into your evening.
Attached is the presentation I used for your reference.
Do let us know if you have any further questions, wish us to speak to colleagues, or there's a good time for us to plan a visit.

I should have mentioned we will publish for public consultation a detailed specification for the AgeAware ecosystem in the next few weeks. Obviously it would be fabulous if Australia could pick up where the EU left off and be a catalyst for putting this into operation. I should also say that that cost of doing so – at least technically – is a fraction of your pilot's budget. Resources could be applied beyond that to the academic research, evaluation of the result and the wider change management and communications effort to win public trust and support, but the core tech development is not extensive as it relies on established techniques which just need to be bespoked for our purposes.

Best wishes

s 47F

Secretary General
euCONSENT ASBL
s 47F
s 47F @euCONSENT.eu
Numéro d'entreprise 0800678976
Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium

From: Tony Allen s 47F @accscheme.com>
Sent: Friday, 15 November 2024 10:25 AM
To: Julie Inman Grant
Cc: s 22 s 47F
Subject: Age Assurance Technology Trial
Attachments: D6.1 Project Plan.pdf

Some people who received this message don't often get email from s 47F @accscheme.com. Learn why this is important

Hi Julie,

I hope that you are well.

I'm delighted to be able to officially confirm that we have been awarded the tender for the Age Assurance Technology Trial, working with our partners at KJR and a global team of unrivalled experts. The Trial is on the back of your sterling work to enhance the protection of children from online harm including through effective, robust age assurance processes.

You are at the very top of my list of people and organisations that I need to engage with as I lead this trial. I'm pleased to be able to attach for you the full detailed project plan and we already have planned an initial stakeholder event in Canberra on 28th November at 2.30pm AEDT (Age Assurance Technology Trial - Stakeholder Event - Nov 28 | RingCentral Events).

I'll be there all week and I'd love to meet with you and the team in advance of that. I am in Sydney on the Monday (25th) before heading down to Canberra for 26th to 29th and then off to Perth from 29th to 2nd. I understand from Iain that you may be around Sydney and I'd be happy to meet there if you're available. Or we could meet whilst I'm in Canberra. I am sure that you and the team have so much that you want to share with me on your vision for this Technology Trial and we're so excited to get started.

You'll see from the project plan that we have established a fabulous and eminent team to lead this work for the Australian Government.

I look forward to hearing from you and the team soon.

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F s 47F @accscheme.com

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme | Age Appropriate Design Certification Scheme | Digital Identity Certification | Data & Privacy

Linke https://www.linkedin.com/in/tonyallenctsp/

Roles:

Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

eSafety FOI 25143
Document 28 of 75

Age Assurance Technology Trial

Document Sensitivity: Public

D6.1 - Project Plan

08/11/2024

Tony Allen

Work Package: WP6 - Project Management & Risks
Task Reference: T6.1 – Project Plan

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Project by

Age Check Certification Scheme

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

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

Document history:

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- Editorial, formatting, and spelling
- Clarification

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

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

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Project Plan

Introduction

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

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

Project Operational Proposal

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

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

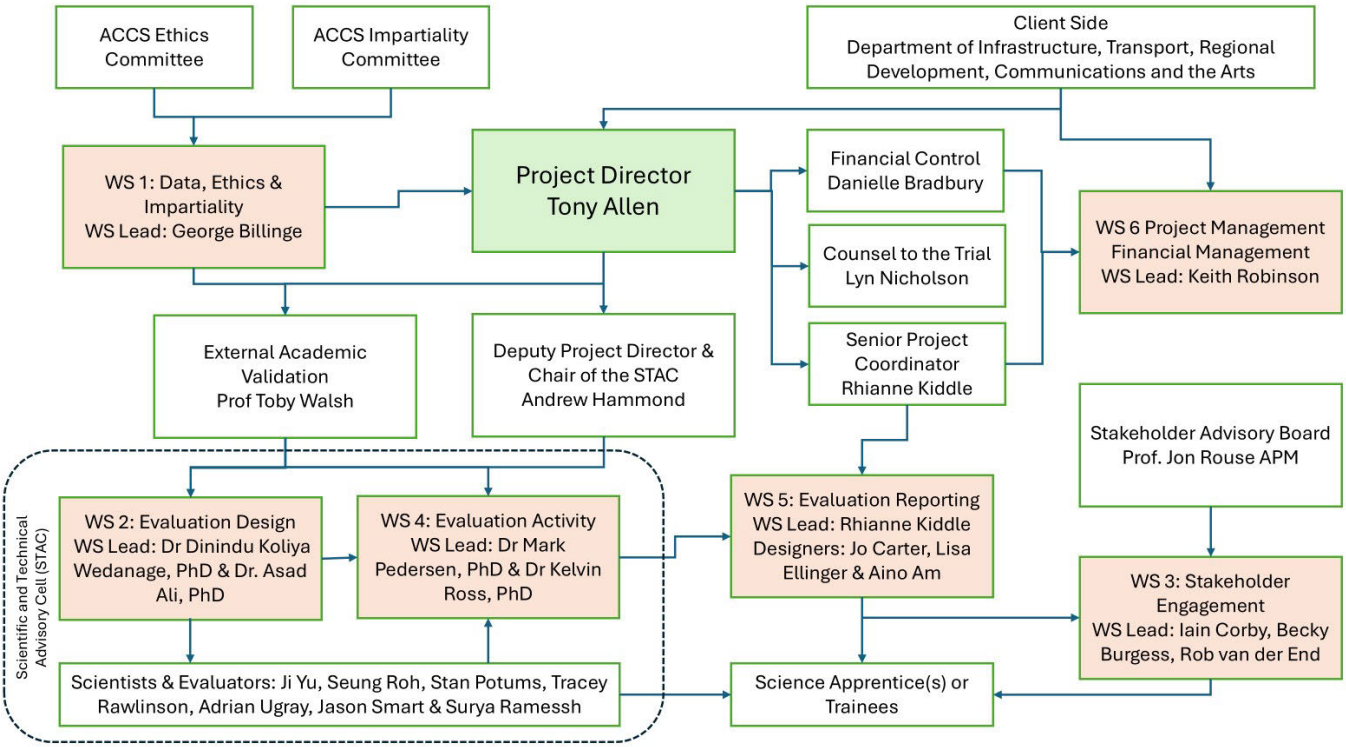
Project Team

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

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

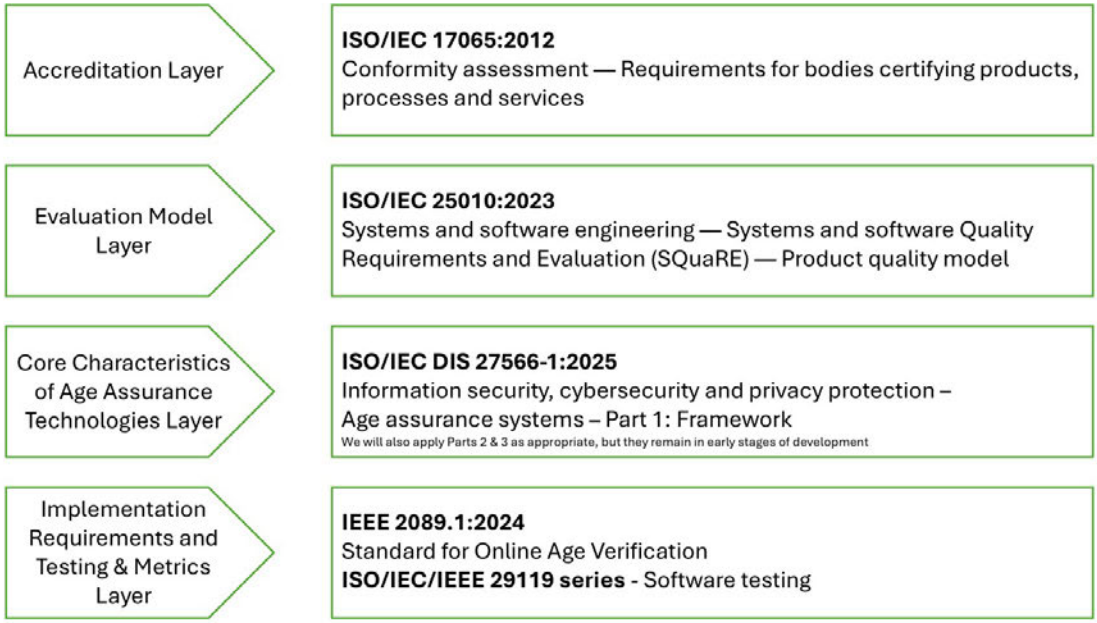
- Holding Redlich (N A Ackroyd and Others); NSW, AU ABN: 15 364 527 724
- Koliya Group; NSW, AU ABN: 60 301 899 055
- Prof. Toby Walsh – University of New South Wales; NSW, AU ABN: 20 392 053 118
- Heartburst PTY Ltd ATF the Heartburst Trust; VIC, AU ABN: 18 609 317 152
- Freelance Graphic Designers: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

The Project Team Structure is as follows:



Standards-Based Evaluation Plan

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



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

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

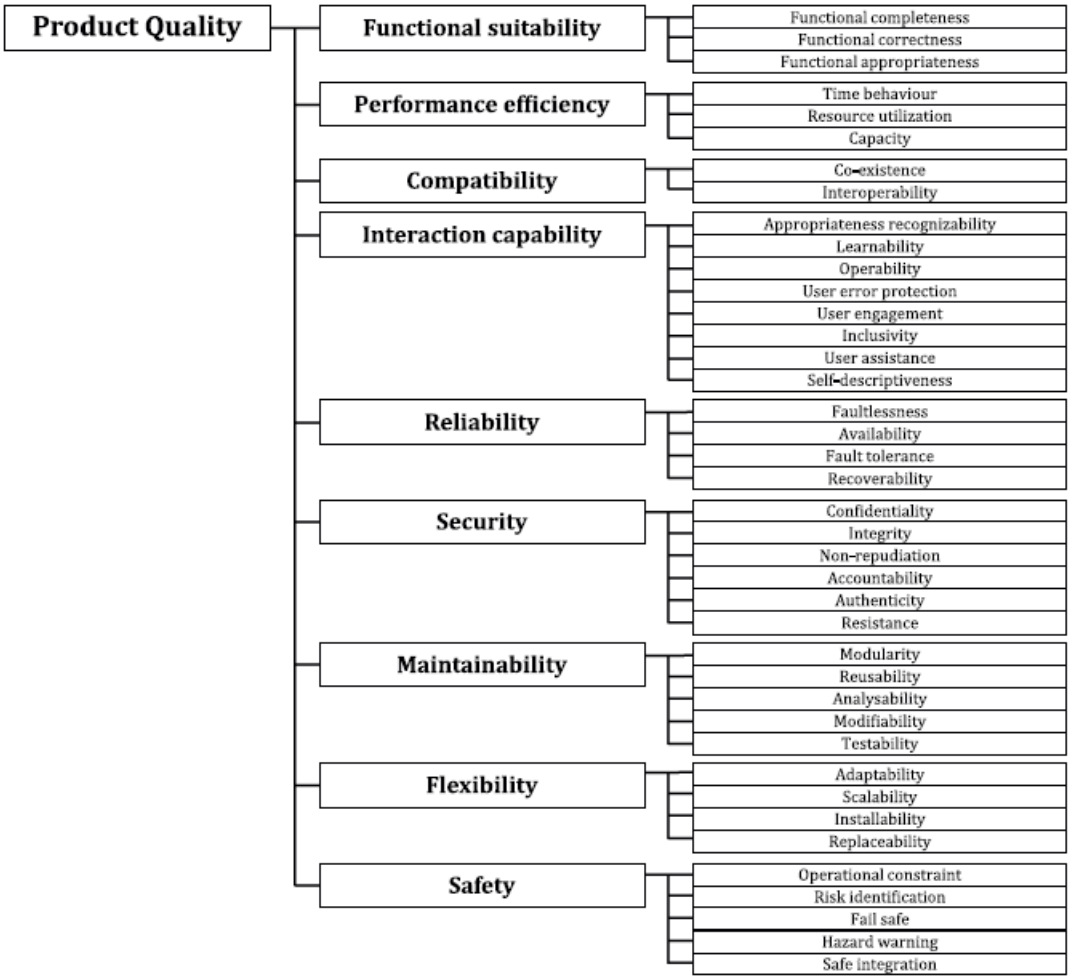
The product quality model is generic to any information technology system, but covers the key aspects of functional suitability, performance efficiency, compatibility, interaction capability, reliability, security, maintainability, flexibility and safety of the technology. It therefore offers a robust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

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

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

Product Quality Model

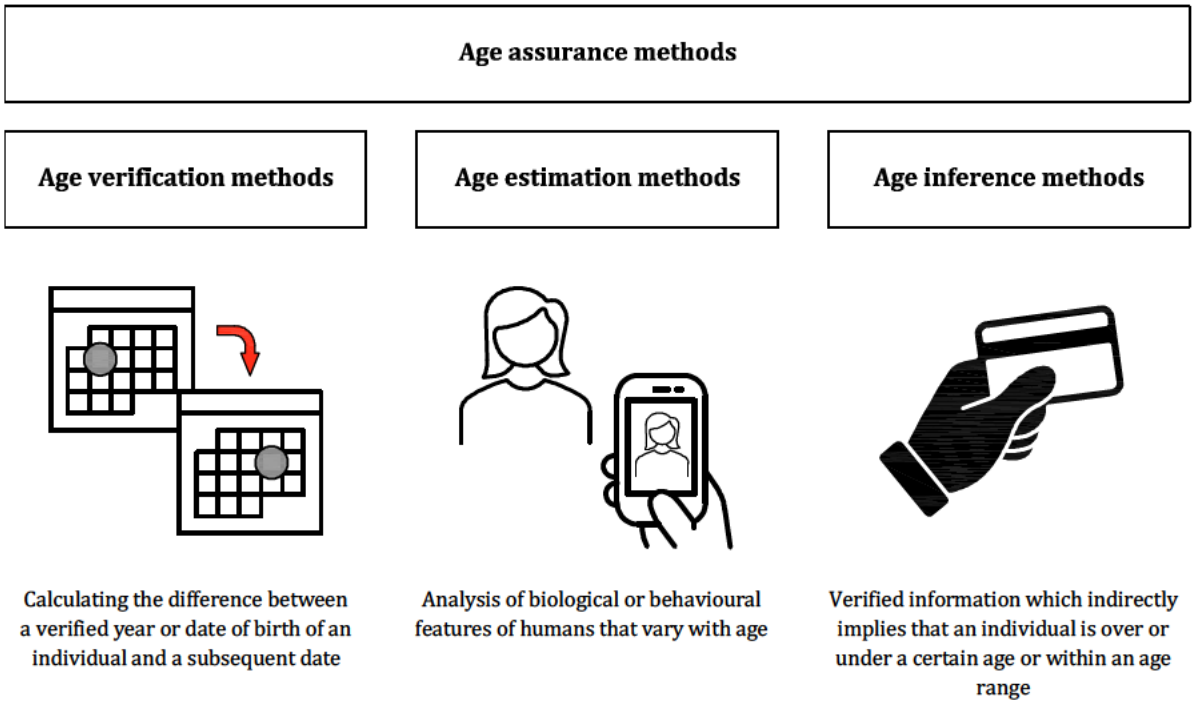
The Product Quality Model is set out in ISO/IEC 25010:



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

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

Types of Age Assurance Methods:



ISO/IEC DIS 27566-1 covers:

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

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

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

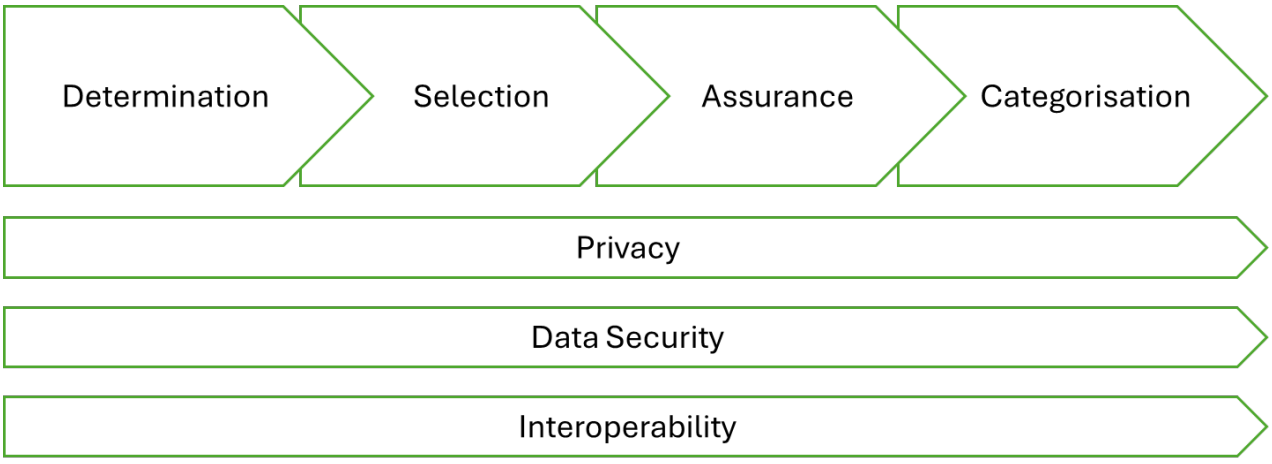
However, notwithstanding the comprehensive framework for age assurance provided by the ISO/IEC 27566 series, The Project Team recognise there are additional issues that are out-of-scope for ISO/IEC 27566, but in scope for this tender, so these have been augmented with the following:

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

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

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

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



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

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

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

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

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

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

Statistical Validity

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

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

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

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

Impartiality, Ethics and Legal Compliance

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

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

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

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

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

Approach to Evaluation

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

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

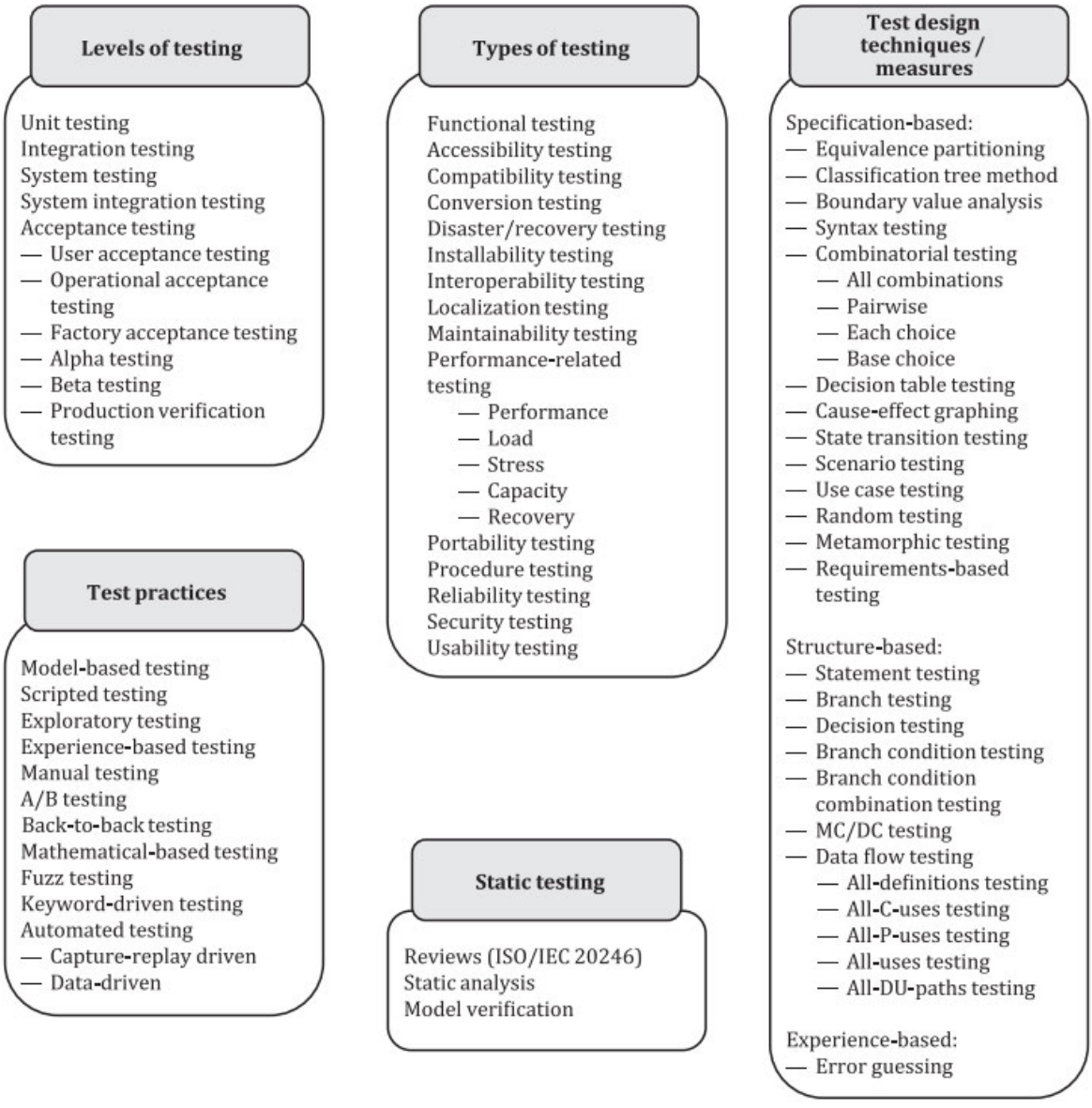
The integration of the specific characteristics of age assurance to the evaluation methodology will be overseen by subject matter expert, Tony Allen and supported by ACCS lead data scientist, Surya Ramessh.

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

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

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

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



Independent Validation

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

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

Stakeholder Consultation

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

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

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

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

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

Engagement Events

The Project will include four engagement events for stakeholders.

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

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

Calls for Participation

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

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

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

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

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

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

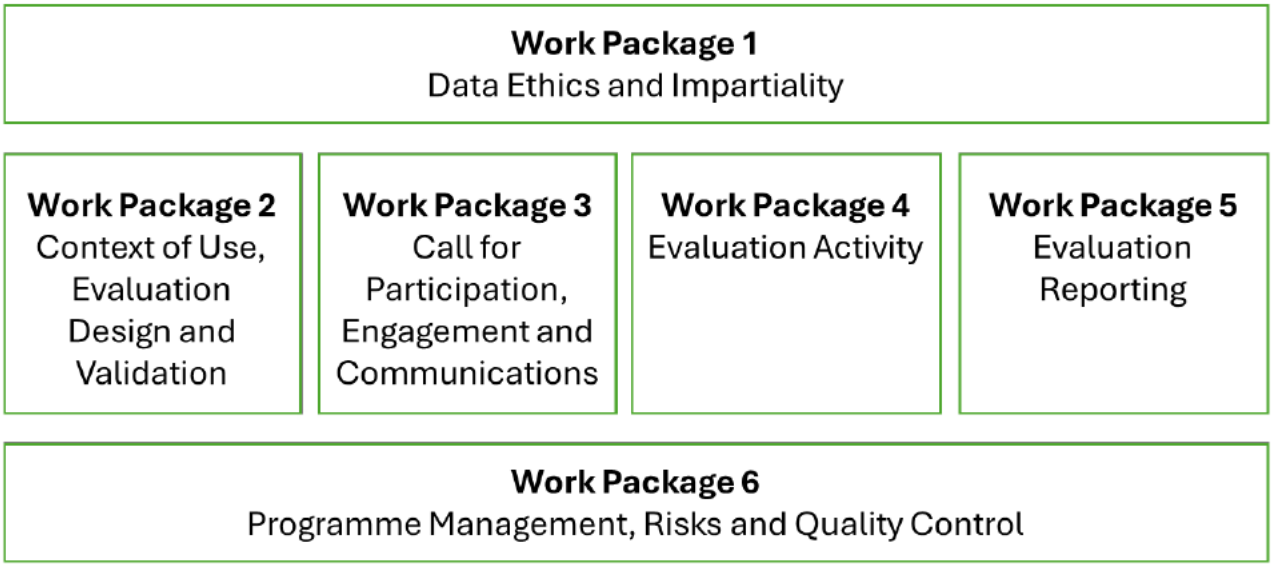
The provision of parental consent and parental control services in Australia includes engaging with organisations like the Alannah & Madeline Foundation, Bark, Qustodio, Parent Power Box; but also including global services like the Family Centre services provided by platforms (Google, Apple, etc) and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

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

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

Organisational Management of the Project

The Project will be managed through the PM^2 toolkit. The project is broken down into six work packages:



Work Package 1: Data, Ethics and Impartiality

Work Stream Leader: George Billinge

Work Package 1: Data, Ethics and Impartiality	**Time period:** M1-M7	5% of budget
Objective: This work package covers the critical risks associated with data, ethics and impartiality of the technology trial. It particularly covers the data collection, analysis and controls associated with children's data, including biometric data. It covers ethical considerations relevant to the trial, including potential bias, discrimination and outcome error parity for indigenous populations in	**Budget & Resources:** WP Leader: George Billinge, Principal, Illuminate Tech Counsel to the Project: Lyn Nicholson, Holding Redlich, Sydney Johnny Fejo, Cultural Advisor, KJR.	

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

and put in place appropriate measures and controls to address them.	
T1.4 Impartiality Mechanism – This task involves the submission of project proposal, project plan and final report to the ACCS Impartiality Panel (as its established impartiality mechanism under ISO 17065). This will include the creation of a conflict of interest declaration and register which will be applicable throughout the project.	**A-1.4.1** Initial Impartiality Report [M1] **A-1.4.2** Conflict of Interest Register [M1] **A-1.4.3** Mid-Project Impartiality Report [M4] **D-1.4 Final Project Impartiality Report [M7]**

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

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

Work Package 2: Context of Use, Evaluation Design & Validation	**Time period:** M1-M2	22% of budget
Objective: This work package covers understanding the specific context in use of age assurance technology in the Australian context, including online safety, privacy and digital ID legislation, ASP security management and the specific programme requirements. It includes a literature review, research relevant to the evaluation of age assurance technologies from domestic and international sources. This work package covers the design and development of a standardised and replicable evaluation process using ISO/IEC 25040 – Systems and software quality requirements and evaluation; applying the five core characteristics identified in ISO/IEC DIS 27566 – Age assurance systems – Part 1: Framework and the specific indicators of confidence and measurement characteristics identified in IEEE 2089.1 – Online age checking systems and the Software Engineering test design methods in ISO/IEC 29119. All of this within existing ISO 17065 accreditation. This work package covers the validation and approval of the approach to evaluation.	**Resources:** WP Leaders: Dr Dinindu Koliya Wedanage, Data Engineer & Dr Asad Ali, Principal Technologist Independent Validation: Prof. Toby Walsh; University of New South Wales AI Institute Evaluation Designers, Dr Asad Ali, Illuminate Tech, Andrew Hammond, KJR, Dr Mark Pederson, KJR. Lead Evaluation Developers: Adrian Ugray Evaluation Engineer – Lead Technology Stack Jason Smart Evaluation Engineer – Lead TRA Ji Yu Jan Evaluation Engineer – Lead Age Verification	

	Seung Rog Evaluation Engineer – Lead Age Estimation Stan Potums Evaluation Engineer – Lead Age Inference Tracey Rawlinson Evaluation Engineer – Lead Parent Consent/Control Surya Naraynan Evaluation Engineer – Lead Data Science Need: Standards access, Evaluation designers, ISO 25000 SQuaRE Evaluators, ISO/IEC 27566 / IEEE 2089.1 SMEs, Tech Stack & Tech Readiness Assessors, Statistical Analysts, Data Scientists, AU Context Contacts, Third Sector, Agencies,
Tasks & Resources	**Key Activities & Deliverables (in Bold):**
T2.1 Understanding the National Context – Analysis of the existing understanding of age assurance technology in Australia, including consumer attitudes and literature review. Analysis of the input from responses to information requests under s.20 of the Online Safety (Basic Online Safety Expectations) Determination 2022 (Due in M2) (#RFT 3.1.7). Review of the inputs to the Roadmap for Age Verification and the background from the eSafety Commissioner through the Online Safety Act 2021.	**A-2.1.1** Identification of Relevant Materials, Open Source Research and Specific Reports [M1] **D-2.1 Analysis of the Australian Context Report [M2]**
T2.2 Understanding the Deployment Context in Australia – Developing understanding of the context in use for Australia, to include the Privacy Act 1988, Digital ID Act 2024 (including accreditation rules and data standards), human rights and anti-discrimination legislation (particularly Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities) and the ASD Information Security Manual. This task needs to include engagement with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) on any additional factors or considerations for inclusion in the evaluation criteria. The research embraces the fact that Aboriginal and Torres Strait Islander	**A-2.2.1** Analysis of the relevant deployment contexts in Australia [M2] **A-2.2.2** Application of the ASD Information Security Manual to the project, including analysis of the accreditation and data standards from the AU Digital ID Framework.[M2] **A-2.2.3** Application of the research to the Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities. [M2]

peoples and multi-ethnic diverse communities have existed continuously as distinct societies, with diverse and unique laws, cultures, knowledge and worldviews that can inform research across a wide range of disciplines including physical sciences, social sciences and humanities.	**A-2.2.4** Engagement with DITRDCA on potential additional factors or considerations [M1]
T2.3 Evaluation Design (Systems & Software Engineering Quality Requirements and Evaluation) – Development of an evaluation structure in accordance with ISO/IEC 25040. The product quality model categorizes product quality properties into nine characteristics: functional suitability, performance efficiency, compatibility, interaction capability, reliability, security, maintainability, flexibility and safety. Each characteristic is composed of a set of related sub-characteristics. This methodology will incorporate accuracy, interoperability, reliability, ease of use, freedom from bias, protection of privacy, data security and human rights protections as contexts in use.	**A-2.3.1** Analysis of relevant aspects and mapping of ISO/IEC 25010 [M1] **A-2.3.2** Building of an Evaluation Matrix in accordance with ISO/IEC 25040 [M2]
T2.4 Evaluation Design (Integration of ISO/IEC 27566 Core Characteristics and IEEE 2089.1 Evaluation Metrics) – Current development of ISO/IEC 27566-1 Core Characteristics need to be mapped to an evaluation matrix (see T2.3). These characteristics (covering functionality, performance, privacy, security and acceptability) for age assurance systems. The consideration of performance metrics needs to be aligned with IEE 2089.1 Annex B, but it may be the case that some progress is made with ISO/IEC 27566-3 covering evaluation (it is suspected that this will not be sufficiently mature for this project). Having completed that analysis, it needs to be drawn together into the evaluation matrix (see T2.3). This also feeds in to the IEEE 2089.1 and ISO/IEC 27566-1 indicators of confidence – Asserted, Basic, Standards, Enhanced & Strict.	**A-2.4.1** Analysis of ISO/IEC 27566-1 Core Characteristics to align to the ISO/IEC 25010 Product Quality Model [M1] **A-2.4.2** Analysis of IEEE 2089.1 Analysis Metrics (in Annex B) and alignment to the ISO/IEC 27566 Performance Characteristics and then feeding in to the ISO/IEC 25040 Evaluation Matrix. [M2]
T2.5 Evaluation Design (Biometric and Test Subject Data Capture) – The capture of biometric images (face, voice, hand modality), tokenised attribute exchange models (such as Age Aware by EUConsent), and age inference through non-governmental hard identifiers (like credits cards, open banking connect, etc.) together with the gathering of ground-truth data for test subjects, built to a standardised	**A-2.5.1** Analysis of age assurance methods including age verification, age estimation and age inference to develop a biometric and test subject data requirement for evaluation. [M2]

metadata taxonomy for analytics is a critical part of the evaluation preparation. The test subject needs to consider biometric age estimation, account confirmation processes, email verification processes, parental consent, age-appropriate tokenised attribute exchange models and device or operating level interventions (seeT2.7).	**A-2.5.2** Analysis of tokenised attribute exchange models available for evaluation. [M2] **A-2.5.3** Creation of metadata taxonomy for test data subjects. [M2] **D-2.5 Creation of age assurance modality protocols and guides for all age assurance methods in scope. [M2]**
T2.6 Evaluation Design (Technology Stack) – Evaluation of deployments and technology readiness assessment at the device, operating system, digital platform, application level and at the point of delivery/access. Technology deployment samples need to address different platforms, at device and IS level and at platform level (such as plugins to standard HTML platforms) and readiness in the Australian context.	**A-2.6.1** Development of technology stack mapping with age assurance deployments [M3] **A-2.6.2** Identification of source deployments in relying parties and test protocols for context in use [M2]
T2.7 Evaluation Design (Sampling and Statistical Assumptions/Limitations) – This task explores ensuring statistical significance of the evaluation activity. This is principally based around classification accuracy measures (false accept rate, false reject rate, failure to acquire rate), binding accuracy (age assurance output relates to the correct individual), outcome error parity (freedom from bias). Taking the 26m population of Australia and applying a generally accepted in research methodology confidence interval of 95% (giving a Z score of 1.96), and a proposed margin of error of 0.03; this leads to a sample size of 1067+. This would apply to population wide analysis, but apply a wider margin of error of 0.05 to specific population sub categories (making the sample size 384+). NOTE: The confidence interval and margin of error is not the same thing as the classification accuracy of the system under test, it is about the reliability of the statistical sampling of that system under test. Specificity measures a test's ability to correctly identify true negatives, while sensitivity assesses its ability to correctly	**A-2.7.1** Preparation of statistical theorem protocols, based on the requirements in IEEE 2089.1 Annex B and statistical best practice (in accordance with Australian Bureau of Statistics guidance). [M2] **A-2.7.2** Identification of all statistical measures to be deployed. [M2] **A-2.7.3** Identification of measurement uncertainty parameters and the requirements for sample sizes, confidence intervals, specificity and sensitivity. [M2] **A-2.7.4** Development of approach to securing outcome error parity analysis. [M2]

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

Work Package 3: Call for Participation, Engagement & Communications

Work Stream Leader: Iain Corby

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

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

data gathering capability (using WordPress templates and MS Forms). Reports on all deliverables (subject to any security concerns or restrictions from DITRDCA) would be available through the website to ensure openness and transparency in the project. This task also provides the data gathering capability, particularly for the collection of practice statements (ISO 27566, clause 11) and efficacy claims from age assurance providers (IEEE 2089.1 Annex B). This task also covers bug identification and reporting for online communications. Each task leader and the project team will be providing regular blog entries and materials for inclusion on the public website.	**A-3.2.2** Maintaining publication of appropriate documentation through the website [M1 – M8] **A-3.2.3** Creation of online facility for the calls for participation (see T3.3 – 3.5) [M2] **A-3.2.4** Creation of online forms and questionnaires for data and evidence gathering from participants [M3] **A-3.2.5** Creation of an online bug reporting mechanism [M4]
T3.3 Call for Participation (Age Assurance Providers and Intermediaries) – This task identifies, communicates with and gains the proactive engagement in the project from Age Assurance Providers and relevant Intermediaries (such as mobile network operators like Optus, Telstra and Vodafone), financial institutions (such as ANZ Bank, Commonwealth Bank, National Australia Bank, Westpac, etc.), credit agencies (such as Equifax, Experian and Illion) and other possible data intermediaries. It would also cover component service providers to age assurance (such as liveness detection, document authenticity detection, deepfake and video injection attack detection as examples). This would take into account advance expressions of interest to DITRDCA, but also existing ACCS clients (including those in Australia and Globally) and members of the Age Verification Providers Association (AVPA).	**A-3.3.1** Establishing contact with AVPA, age assurance providers in direct contact with DITRDCA and existing ACCS clients about the trial [M2] **A-3.3.2** Establishing the parameters and guidelines for age assurance provider participants [M3] **A-3.3.3** Issuing the call for participants to Age assurance providers and intermediaries [M4]
T3.4 Call for Participation (Relying Parties) – This task identifies, communicates with and gains the proactive engagement in the project from relying parties. These are organisations (such as social media companies, gaming, adult content, restricted goods, content, services, venues or spaces) that use (or ought to use) age assurance results for making age-related eligibility decisions. This task would include engagement with an liaison with organisations like the Australian Information Industry Association (AIIA), Australian Computer Society (ACS), Tech Council of	**A-3.4.1** Establishing contact with AIIA, ACS, TCA, DTSP, etc; relying parties in direct contact with DITRDCA and existing strategic contacts with relying parties already held by ACCS [M2] **A-3.4.2** Establishing the parameters and guidelines for relying party participants [M3] **A-3.4.3** Issuing the call for participants to relying parties – particularly social media

Australia (TCA) and international organisations like the Digital Trust and Safety Partnership (DTSP).	and online platforms for adult content [M4]
T3.5 Call for Participation (Parental Consent and Control Services) – This task identifies, communicates with and gains proactive engagement in the project from providers of parental consent and parental control services in Australia. This could include organisations like the Alannah & Madeline Foundation, Bark, Qustodio, Parent Power Box; but would also include global services like the Family Centre services provided by platforms (Google, Apple, etc) and social media (Meta, TikTok, Snap, etc)	**A-3.5.1** Establishing contact with parental consent and control services available in AU and globally, including services in direct contact with DITRDCA [M2] **A-3.5.2** Establishing the parameters and guidelines for parental consent and control services [M4] **A-3.5.3** Issuing the call for participants for parental consent and control services [M5]
T3.6 Gathering Practice Statements – This task gathers existing and developed practice statements (ISO 27566, Clause 11) for age assurance providers, intermediaries and relying parties. Although existing ACCS certified age assurance providers will already have a practice statement, other participants may need to develop one, so the project includes an interactive online questionnaire/tool for establishing practice statements. The practice statements cover functionality, performance, privacy, security and acceptability parameters and configuration settings for the deployment of age assurance systems.	**A-3.6.1** Creating an online portal for the collection of practice statements [M2] **A-3.6.2** Briefing for participants on practice statements, including a training course on how to prepare them in accordance with ISO/IEC 27566 Clause 11 [M3] **A-3.6.3** Open call for practice statements to be submitted [M4] **D-3.6 Collation of practice statements for evaluation [M5]**
T3.7 Call for Participation (Test Subjects, including Children) – This task identifies, engages with and gains the proactive participation of a sufficient number of test participants (see T 2.5) to meet the statistical requirements of the project (see T2.7). The recruitment process would include establishing the consent mechanisms (see T1.1) safeguarding children (see T1.3) and the ethical considerations (see T1.3). It would also include ensuring statistically significant representation of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities. in testing and analysis.	**A-3.7.1** Establishing the parameters and guidelines for human test subjects, including children [M3] **A-3.7.2** Establishing the consent mechanisms, including where necessary, parental consent mechanisms for human test subjects (see T1.1) [M3] **A-3.7.3** Establish a contract with an AU-based mystery shopping provider [M3] **A-3.7.4** Establish a contract with a UX AT provider [M3]

This task will include working with members of the Mystery Shopping Providers Association (MSPA) in Australia. The procurement of these services would be locally in Australia through existing contacts, but based on competitive quotations. The task will include engagement and participation with schools and educational establishments geographically spread.	**A-3.7.5** Establishing the data collection requirements to match to ground truth metadata taxonomy (see T2.5) [M4] **A-3.7.6** Issuing the call for participants for human test subjects [M4] **A-3.7.7** Outreach to schools and educational establishments to secure human test subject participation – suggest six schools geographically spread across Australia for selection for participation [M4] **A-3.7.8** Establish links to representatives of Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities to ensure that human test subjects are demographically representative for Australia [M4]

Work Package 4: Evaluation Activity

Work Stream Leaders: Dr Mark Pedersen & Dr Kelvin Ross

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

support real world deployment. It will be delivered through weekly STAC Meetings forming the core of the project's scientific approach. Finally, this work package includes any remedial evaluation following initial analysis of results or feedback from the preliminary report (see T5.3).	Jason Smart Evaluation Engineer – Lead TRA Ji Yu Jan Evaluation Engineer – Lead Age Verification Seung Rog Evaluation Engineer – Lead Age Estimation Stan Potums Evaluation Engineer – Lead Age Inference Tracey Rawlinson Evaluation Engineer – Lead Parent Consent/Control Surya Naraynan Evaluation Engineer – Lead Data Science
Tasks & Resources	**Key Activities & Deliverables (in Bold):**
T4.1 Evaluation of age verification technologies – This task covers the deployment of age verification technologies that validate data, information, documents or materials to establish a date or year of birth and compute that with a subsequent date to provide an age assurance result indicating that a person is over/under an age threshold. This task will include the efficacy, accuracy, privacy, security and acceptability characteristics associated with those (see ISO 27566 and IEEE 2089.1). The evaluation will include binding effectiveness and susceptibility to presentation attack vectors of age verification technologies. These will take into account biometric presentation attacks for selfie matching (see ISO 19795). Evaluations will be conducted in line with the product quality model set out in ISO 25010 and the approach to evaluation in ISO 25040. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for age verification technologies, including identity challenged demographics (see T4.8)	**A-4.1.1** Analysis of practice statements (see T3.6) of age verification technologies [M4] **A-4.1.2** Deployment of approved evaluation methodologies for age verification technologies (see T2.9) [M3] **A-4.1.3** Comparative quantitative statistical analysis of the efficacy age verification technologies [M4] **A-4.1.4** Comparative quantitative statistical analysis of binding effectiveness and susceptibility to presentation attack vectors of age verification technologies. [M4] **A-4.1.5** Comparative technology readiness assessment of age verification technologies for inclusion in T4.7 [M5] **A-4.1.6** Qualitative analysis of implementation factors associated with age verification technologies. [M5]

T4.2 Evaluation of age estimation technologies – This task covers the deployment of age estimation technologies that undertake analysis of biological or behavioural features of humans that vary with age to provide an age assurance result indicating that a person is over/under an age threshold. These systems sometimes employ machine learning and artificial intelligence and may be subject to configuration settings or age buffers to avoid false positives based on inherent performance errors. This task will include the efficacy, accuracy, privacy, security and acceptability characteristics (see ISO 27566 and IEEE 2089.1). This also includes a more statistical analytical approach, such as establishing the mean absolute errors, standard deviation and outcome error parity of age estimation approaches. The evaluation will include UX workflow binding effectiveness (i.e. can you simply switch the user within the workflow), binding effectiveness, susceptibility to presentation attack and examination of the impact of ambient lighting on the efficacy of the system (something that is a known factor in face skin tone bias as an example). Evaluations will be conducted in line with the product quality model set out in ISO 25010 (applying the statistical measurement methodologies set out in ISO 10576). A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for age verification technologies including outcome error parity for humans with protected characteristics in equality legislation (see T4.8)	**A-4.2.1** Analysis of practice statements (see T3.6) of age estimation technologies [M4] **A-4.2.2** Deployment of approved evaluation methodologies for age estimation technologies (see T2.9) [M3] **A-4.2.3** Comparative quantitative statistical analysis of the efficacy age estimation technologies [M4] **A-4.2.4** Comparative quantitative statistical analysis of binding effectiveness and susceptibility to presentation attack vectors and ambient lighting of age estimation technologies. [M4] **A-4.2.5** Comparative technology readiness assessment of age estimation technologies for inclusion in T4.7 [M5] **A-4.2.6** Comparative analysis of outcome error parity of age estimation technologies for humans with protected characteristics. [M5] **A-4.2.7** Qualitative analysis of implementation factors associated with age verification technologies. [M5]
T4.3 Evaluation of age inference technologies – This task covers the deployment of age inference technologies that validate the existence of facts or data about an individual that can result in their age or age range being inferred. These systems rely on the status of facts (such as the holder of a credit card) being in law required to be a certain age. This task will include the assessment of the reliability of inference facts from the technologies deployed – they can include for instance presence of registers of electors, holders of certain licences or permissions, military or public service, marital records and many other possibilities. This	**A-4.3.1** Analysis of practice statements (see T3.6) of age inference technologies [M4] **A-4.3.2** Deployment of approved evaluation methodologies for age inference technologies (see T2.9) [M3] **A-4.3.3** Comparative qualitative analysis of the validity of inference methods based on differing cultural, regulatory or accuracy characteristics. [M4]

task will include the efficacy, accuracy, privacy, security and acceptability characteristics (see ISO 27566). The evaluation will include binding effectiveness and susceptibility of false record injection attack. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for age inference technologies including the validity of inference based on differing cultural, regulatory or accuracy status of data in different states or territories and communities (see T4.8)	**A-4.3.4** Comparative quantitative statistical analysis of binding effectiveness and susceptibility to false record injection attack vectors. [M4] **A-4.3.5** Comparative technology readiness assessment of age inference technologies for inclusion in T4.7 [M5] **A-4.3.6** Qualitative analysis of implementation factors associated with age inference technologies. [M5]
T4.4 Evaluation of successive validation (waterfall method) approaches – This task covers age assurance providers and relying parties that provide multiple and successive approaches to age assurance, usually starting with an age assertion method and then supplemented by successive age assurance methods until the requisite level of confidence in the age of the individual is established. These systems can rely on cumulative assurance, but usually rely on gradually more privacy invasive approaches to gain assurance. This task will include the efficacy, accuracy, privacy, security and acceptability characteristics (see ISO 27566). The evaluation will include analysis and understanding of the practice statements of relying parties deploying successive validation, particularly where they are utilising multiple age assurance provider inputs and/or orchestration service providers. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for successive validation (see T4.8).	**A-4.4.1** Analysis of practice statements (see T3.6) of relying parties and age assurance providers that are deploying successive validation techniques [M4] **A-4.4.2** Deployment of approved evaluation methodologies for successive validation techniques (see T2.9) [M3] **A-4.4.3** Comparative qualitative analysis of the validity of successive validation, particular where relying parties are utilizing multiple age assurance providers and/or orchestration service providers. [M5] **A-4.4.4** Comparative technology readiness assessment of successive validation techniques for inclusion in T4.7 [M5] **A-4.4.5** Qualitative analysis of implementation factors associated with successive validation techniques. [M5]
T4.5 Evaluation of parental consent or control mechanisms – This task involves the deployment of parental consent (i.e. processes whereby a child prompts a parent, guardian or legally responsible adult to grant consent and approval	**A-4.5.1** Analysis of practice statements (see T3.6) of relying parties that are deploying parental consent or control techniques [M4]

usually on app or service in the onboarding user experience when accessing age restricted goods, services, content, venues or spaces) or parental control (i.e. processes whereby a parent, guardian, etc establishes advance approval and control over access, which are often deployed through on device or on connectivity router family control systems). The task includes the efficacy of consent mechanisms, binding of children to the correct parent/guardian (verification), evolving capability of children to consent and age appropriate design. The task also includes effectiveness of third-party control mechanisms to filter age in-appropriate content without over filtering news, health, educational and support resources (such as substance abuse, suicide prevention, pregnancy advisory, body dysmorphia support services or sexuality/gender advisory services) – this task is not about testing individual site age gates. This will also include addressing the evolving capacity of children, issues of coercive control or abuse and age appropriate design in accordance with the 5Rights principles and the four C's content, contact, conduct and commerce developed by the Children Online: Research and Evidence (CO:RE) project, which was funded by the European Commission. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for parental consent and control mechanisms (see T4.8).	**A-4.5.2** Deployment of approved evaluation methodologies for parental consent techniques including efficacy, binding, evolving capacity and age appropriate design to 5Rights principles (see T2.9) [M3] **A-4.5.3** Deployment of approved evaluation methodologies for parental control techniques including efficacy, filter effectiveness, evolving capacity, susceptibility to coercive control and abuse and age appropriate design to 5Rights principles (see T2.9) [M3] **A-4.5.4** Comparative qualitative analysis of the validity of parental consent or control methodologies. [M5] **A-4.5.5** Comparative analysis of the validity of parental control techniques at different levels of the technology stack (see T4.6) **A-4.5.6** Comparative technology readiness assessment of successive validation techniques for inclusion in T4.7 [M5] **A-4.5.7** Qualitative analysis of implementation factors associated with successive validation techniques. [M5]
T4.6 Evaluation of technology stack deployments – This task explores the deployment of age assurance techniques at different levels of the technology stack including front-end and back-end deployments. This could include on device, on platform, on server, on router, in app store, in app, in user experience or in onboarding/checkout experiences for different age restricted goods, content, services, venues or spaces. This task will also explore interoperability of tokenised memorisation of age assurance results, such as through the euCONSENT Age	**A-4.6.1** Analysis of practice statements (see T3.6) of relying parties that are advocating for are relying upon technology stack deployments outside of their own control (i.e. on device, on router, in app store etc) [M4] **A-4.6.2** Analysis of practice statements (see T3.6) of relying parties that are developing their own technology stack deployments (i.e. in app, in user

Aware solution. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for technology stack deployments (see T4.8). This task involves identification and analysis of practice statements of relying parties that are either reliant upon the deployments in tech stacks outside of their control (such as on device, on router or in app store) and those that are inside their control (such as in app, in user experience, in onboarding/checkout or on platform. The qualitative analysis will be dependent upon the effectiveness of different age assurance methods at different levels of the tech stack, including the binding effectiveness to the individual user. The analysis of tech stack deployments also needs to take account of the use of devices in multiple locations (through different local connectivity) and through multiple networks, including the potential use of virtual private networks to evade tech stack controls. Evaluations will be conducted in line with the product quality model set out in ISO 25010. A comparative analysis will be provided, which in turn can be linked to the technology readiness analysis (see T4.7). This task will include an analysis of implementation factors for parental consent and control mechanisms (see T4.8).	experience, in onboarding/checkout, on platform, etc) [M4] **A-4.6.3** Analysis of reusable tokenised age assurance across multiple relying parties and tech stack deployments [M5] **A-4.6.4** Deployment of approved evaluation methodologies for analysis of technology stack deployments of age assurance techniques. [M4] **A-4.6.5** Comparative qualitative analysis of the validity of various technology stack deployments. [M5] **A-4.6.6** Comparative technology readiness assessment of technology stack deployments for inclusion in T4.7 [M5] **A-4.6.7** Qualitative analysis of implementation factors associated with technology stack deployments. [M5]
T4.7 Evaluation of technology readiness – This task involves a structured approach to technology readiness of age assurance technologies. This will be undertaken at two levels. Firstly the market-wide technology readiness assessment similar to the State-of-the-Art analysis undertaken for Ofcom and ICO as a part of the measurement of age assurance technologies undertaken by ACCS. This involves understanding technical maturity, scalability, market choice, availability and collective understanding of performance characteristics across all providers.	**A-4.7.1** Collation of technology readiness assessments from other evaluations [M5] **A-4.7.2** Production of a market wide technology readiness analysis covering market choice, availability and performance characteristics of different age assurance deployment at different levels of the technology stack [M5] **A-4.7.3** Production of individual technology readiness assessments for each participant age assurance, parental consent, parental control or technology

Secondly the technology readiness assessment of individual trial participants for their deployments of age assurance methods. This needs to be conducted on each individual method that they make available for implementation by relying parties; on the use of successive validation if they use that; on the deployment within different layers of the technology stack; and through the creation and/or acceptance of tokenised age assurance results in an interoperable market. Technology readiness assessments will be conducted in accordance with the DoD recognised TRL 1-9 basis using objective evidence of readiness.	stack provider participant in the trial based on a pro-forma to DoD TRL analysis [M6]
T4.8 Evaluation of implementation factors – This task involves examination of potential implementation factors for age assurance technologies in the Australian context. This will include analysis from the consumer and user research conducted by DITRDCA (see T2.1). The task covers consideration of societal, technical and ethical aspects, including Australian Legislation, the Trusted Digital Identity Framework and user acceptability. The results of analysis of usability, inclusiveness and absence of unintended consequences (such as over-filtering or failing to address the evolving capacities of children to make their own choices). The task will also explore cultural sensitivity and understanding how age assurance technologies affect cultural norms and practices in Australia, particularly with Aboriginal and Torres Strait Islander peoples and multi-ethnic diverse communities or other culturally diverse communities and social impacts including the societal implications of widespread age assurance, including the impact on user anonymity, freedom of speech, and access to information. The task will also explore economic and cost implications providing an overview of the competitive cost profiles of providers (whilst also protecting market sensitive data and fostering effective competition).	**A-4.8.1** Collation of implementation factors identified from other evaluations [M5] **A-4.8.2** Production of an analysis of implementation factors in the Australian Context. [M6] **A-4.8.3** Production of a market economic analysis of the cost profiles of providers (whilst protecting market sensitive data and fostering effective competition) [M6]

T4.9 Remedial Evaluation – This task recognises that despite clear evaluation planning (See Workstream 2), Stakeholder Engagement (See Workstream 3) and a structured approach to evaluation deployment (See Workstream 4), it is likely that some matters will arise during analysis and after production of preliminary results. Therefore, within reasonable expectations, this task covers the remedial evaluation or additional evaluations required to address any shortcomings identified.	**A-4.9.1** Complete remedial evaluations [M5 & M7]

Work Package 5: Evaluation Reporting

Work Stream Leader: Rhianne Kiddle

Work Package 5: Evaluation Reporting	**Time period:** M5-M8	14% of budget
Objective: This work package covers the evaluation reporting process. It includes gathering research methodology and validation (see T2.8), literature review (see T2.1) and explaining the evaluation context (see T2.2). This involves creation of an Editorial Board, who will meet regularly as the project moves towards publication of the report. There are two phases of reporting: a preliminary report [M6] and a final report [M8]. The task involves considerable effort to make the report: (a) Scientifically robust and resistant to external scrutiny (by academics, statisticians, parliamentarians, stakeholders and trial participants), and (b) Understandable to different audiences (by providing executive summaries, simple explainers, detailed analysis and statistical tables, charts, diagrams and graphics). It is intended that the report will be published in accordance with guidelines issued by the Australian Bureau of Statistics and fit for public Senate Scrutiny.	**Resources:** WP Leader: Rhianne Kiddle, Project Specialist, Project Consultant Dr Mark Pederson, KJR, Dr Kelvin Ross, KJR Dr Dinindu Koliya Wedanage, Data Engineer, Dr Asad Ali, PhD, Surya Ramessh, Data Scientist Lisa Ellinger, Data Visualisation; Aino Am, Graphic Design, Jo Carter, SoJo Creative; Creative Design Independent Validation: Prof. Toby Walsh; University of New South Wales AI Institute Copywriting, editorial, material gathering, photography, publication (ISBN), Technical drawings, flowcharts, analysis, statistical representations, Power BI, etc. Peer review ACCS Impartiality Panel Review as necessary by Australian Bureau of Statistics	

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

publication input to the report without compromising impartiality. This also involves scrutiny by the Ethics Panel and Impartiality Panel for ACCS. Finally, the task involves publication activities, stakeholder engagement (See T3.1) and making the report publicly available through the Project website (See T3.2).	Advisory Board before final preliminary report publication clearance from DITRDCA. [M5] **A-5.3.3** Identification of any pre-publication remedial evaluations required (see T4.9) [M5] **A-5.3.4** Pre-publication quality control on the report.[M6] **A-5.3.5** Consideration of the preliminary report by the Impartiality Panel (see T1.4) and Ethics Panel (see T1.1) [M6] **D-5.3 Publication of the preliminary report; feeding into stakeholder events (See T3.1) and making the report publicly available through the project website (See T3.2). [M6]**
	MILESTONE 3: Completion of Trial and Delivery of a Preliminary Report [M6]
T5.4 Final Report and Summary – This task involves the production of the final report following any remedial evaluation or actions needed as a result of the preliminary report. The task includes the necessary pre-publication quality control checks and clearances that are required to include: (a) DITRDCA (b) eSafety Commissioner and OAIC (c) Ethics Review in accordance with AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research (d) Peer Review by the External Validators UNSW (e) Consideration (but not editorial changes) by our Stakeholder Advisory Board	**A-5.4.1** Analysis of feedback from stakeholder events, public reaction, stakeholder reaction, participant reaction and other feedback from the publication of the preliminary report (See T5.3) [M7] **A-5.4.2** Identification and tasking of any remedial evaluations required (see T4.9) and integration of their results into the final report. [M7] **A-5.4.3** Redrafting of a final report, including pre-publication quality control on the report. [M7] **A-5.4.4** Engagement with DITRDCA and statutory stakeholders on the final report, including any requirements for review by the Australian Bureau of Statistics of pre-

(f) Ethics Panel (g) Impartiality Panel Finally, on publication, this task includes the dissemination activities for the report including legal deposit in the National Library of Australia and feeding into stakeholder events (See T3.1) and making it publicly available through the project website (T3.2). It is also anticipated that there will be other dissemination activities by DITRDCA, including if applicable scrutiny activities post-publication by the Senate.	publication requirements for Australian research subject to public scrutiny. [M8] **A-5.4.5** Consideration of the preliminary report by the Impartiality Panel (see T1.4) and Ethics Panel (see T1.1) [M8] **D-5.4.a Peer review of the final report by the University of New South Wales AI Institute. [M8]** **D-5.4.b Publication of the final report, including allocation of ISBN data and legal deposit with the National Library of Australia; feeding into stakeholder events (See T3.1) and making the report publicly available through the project website (See T3.2). [M8]**
	MILESTONE 4: Completion of Final Report and Summary Document [M8]

Work Package 6: Programme Management, Risks & Quality Control

Work Stream Leaders: Tina Henderson & Keith Robinson

Work Package 6: Programme Management, Risks & Quality Control	**Time period:** M1-M8	5% of budget
Objective: This work package covers programme management. This includes ensuring a structured quality management approach to the project (using PM²), and ensuring that public money is spent appropriately, subject to best value review including for any project procurements, managing risk and timescales and maintaining regular contact with the project commissioners at DITRDCA. Finally this work package covers project	**Resources:** WP Leaders: Tina Henderson, Project Management Keith Robinson, Financial Management Project Consultant	

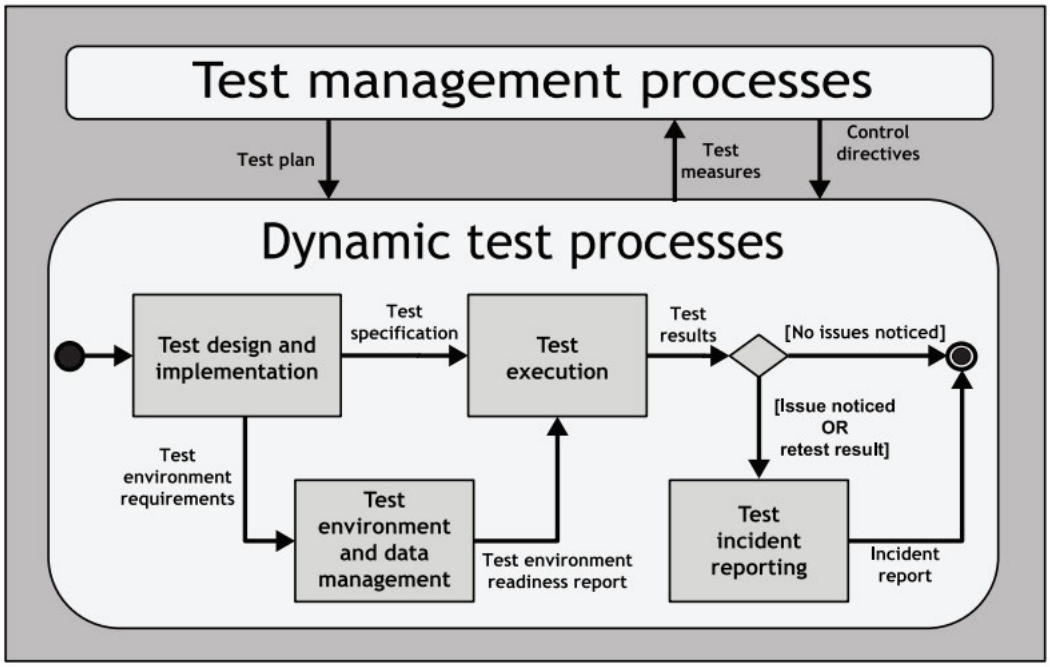
compliance and final review and evaluation of the project as a whole. The Project Board will meeting fortnightly and includes: Tony Allen, Project Director, Andrew Hammond, Deputy Project Director & Chair of the STAC, George Billinge, Data, Ethics and Impartiality, Iain Corby, Stakeholder Relations, and Rhianne Kiddle, Senior Project Coordinator.	Need: PM² document set, Legal, Accounting, Bookkeeping, Project Evaluation
Tasks & Resources	**Key Activities & Deliverables (in Bold):**
T6.1 Production of a Project Plan This task includes the formal adoption of this project plan, timescales, GANTT chart, deliverables and milestones following contract discussions and negotiations with the Department for Infrastructure. This also includes the identification and agreement of KPIs and performance metrics for the discharge of the contract. This activity is pre-project start and should be completed by the beginning of M1.	**A-6.1.1** Establish the project plan including the timescales, GANTT chart, deliverables and milestones. [M0] **A-6.1.2** Obtain approval for the project plan. [M0] **D-6.1 Production of a project plan [M0]** MILESTONE 1: Completion of Project Plan [M0]
T6.2 Project Quality Control/Process Control/Records Management and PM² - This task will ensure rigorous project management, including maintaining quality controlled and adequate records of activity under the project. This includes a PM² project management methodology to deploy the tools, guidelines and templates for planning, managing and delivering the project. The Project Charter provides a set of guiding principles for the deployment of the project so that stakeholders can be informed through the project website (see T3.2) and aligned with the Ethics Handbook. This quality control process is part of the overall management of quality in accordance with the ISO 17065 accreditation and the deployment of laboratory testing in accordance with ISO 17025 accreditation. The Project Handbook helps team members to ensure consistency and compliance with project requirements, documentation and records.	**A-6.2.1** Establish the Project Charter: Defines project scope, objectives, stakeholders (see T3.1) and key deliverables from the project plan (see T6.1). This includes defining the ethical principles of the project (linked to the Ethics Handbook – see T1.1) [M1] **A-6.2.2** Establish a Project Handbook providing detailed project management procedures.[M1] **A-6.2.3** Establish and maintain an Issue Log: Records and tracks project issues. [M1 – M8] **A-6.2.4** Establish and maintain a Change Log to document changes and their impact on the project.[M1 – M8]

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

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

Practical Deployment of Testing Activity

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



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

a) Age verification methods - Ensure that users are accurately verified as being above or below a required age threshold using valid identity documents or other verification methods. This will involve document verification testing using a dataset of 4,000+ legitimate, fake, and altered identity documents (e.g., passports, driver's licenses) from various regions, nationally and internationally. The documents are presented to the UX gateway for participant age assurance providers evaluate whether the system correctly accepts valid documents and rejects fraudulent or tampered ones. There will also be tests with documents that are worn, slightly damaged or poorly scanned to assess how tolerant the system is to imperfect inputs. The Project Team will perform security testing to identify vulnerabilities that could allow users to bypass verification, including biometric comparisons and deep fake and video injection presentation attack.

b) Age estimation methods - Test the system's ability to estimate a user's age based on biological or behavioural features that vary with age. The Project Team's existing test datasets will be augmented with additional images of users of varying ages, ethnicities and genders which reflect the full diversity of the Australian population (27.6% of whom were born overseas), including high-quality and lower-quality images (e.g., different lighting conditions, angles and facial expressions). The images will be uploaded and the systems checked to see how accurately it estimates age, comparing the results with the actual ages and perform tests with both static photos and real-time camera feeds. The Project Team will also explore voice, hand geometry or typing speed analysis, test different age groups and analyse the estimation results. There will be testing with outliers, such as individuals with facial features that may not correspond to their chronological age (e.g., younger adults with premature aging, or children with adult-like features). The Project will also undertake outcome error parity analysis.

c) Age inference methods – Test systems that infer a user's age based on data inputs such as purchase history, possession of other age-related evidence, browser behaviour or online activity. The Team will analyse the assumptions, the reliability of the inference behind decision making tools, simulating various user behaviours online (e.g., browsing child-friendly content vs. adult-targeted services) using existing and new avatar test accounts that mimic different personas, including children, teenagers, and adults, with different browsing histories and online purchase behaviours. The Team will ensure that the system does not violate privacy policies and correctly anonymizes data where required.

d) Parental Consent Technology – The Project will examine whether parental consent systems accurately verify a parent or guardian's identity and relationship to the child before granting access to services. This includes simulating different parent-child relationships, testing various identity verification methods (e.g., credit card verification, email, document upload). The Project Team will also test for cases like foster parents, legal guardians, or step-parents to ensure the system accommodates complex family structures. This will include simulated requests for access from children of different ages and assess how the system handles multiple requests, including revoking

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

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

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

Preliminary Report Production

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

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

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

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

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

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

Final Report Production

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

a) The Department

b) eSafety Commissioner and OAIC

c) Ethics Review in accordance with the Ethics Framework AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research

d) Peer Review by Prof. Toby Walsh at the University of New South Wales

e) Consideration (but not editorial changes) by the Stakeholder Advisory Board

f) ACCS Impartiality Panel

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

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

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

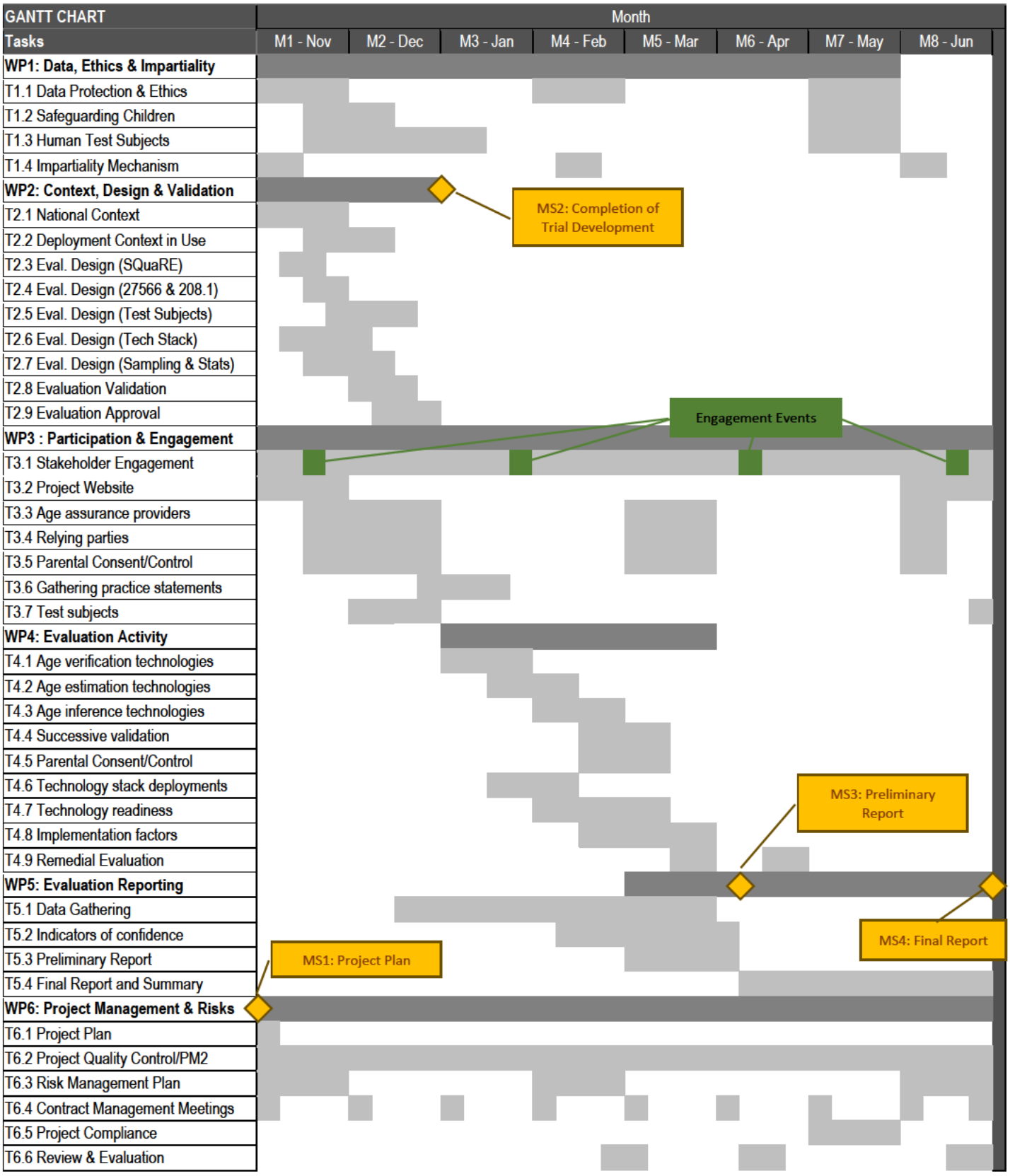
Conclusion

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

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

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

Annex One – GANTT Chart



Annex Two – Monthly Schedule

Month Profile – November 2024 [M1]

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

Month Profile – December 2024 [M2]

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

Month Profile – January 2025 [M3]

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

Month Profile – February 2025 [M4]

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

Month Profile – March 2025 [M5]

Tasks	Deliverables due this month are highlighted in YELLOW; Milestones due this month are highlighted in BLUE.
WP1: Data, Ethics & Impartiality	WP :Lead: George Billinge
T1.1 Data Protection & Ethics	Data & Ethics Monitoring Activity (A-1.1.4)
T1.2 Safeguarding Children	*No specific activity this month*
T1.3 Human Test Subjects	Monitoring of ED&I Activity (A-1.3.4)
T1.4 Impartiality Mechanism	Monitor Conflicts of Interest (A-1.4.2)
WP2: Context, Design & Validation	WP Lead: Dr Dinindu Koliya Wedanage & Dr Asad Ali
T2.1 National Context	**TASK COMPLETED**
T2.2 Deployment Context in Use	**TASK COMPLETED**
T2.3 Eval. Design (SQuaRE)	**TASK COMPLETED**
T2.4 Eval. Design (27566 & 2089.1)	**TASK COMPLETED**
T2.5 Eval. Design (Test Subjects)	**TASK COMPLETED**
T2.6 Eval. Design (Tech Stack)	**TASK COMPLETED**
T2.7 Eval. Design (Sampling & Stats)	**TASK COMPLETED**
T2.8 Evaluation Validation	**TASK COMPLETED**
T2.9 Evaluation Approval	**TASK COMPLETED**
WP3 : Participation & Engagement	WP Lead : Iain Corby
T3.1 Stakeholder Engagement	*No specific activity this month, but support for broader project and communications.*
T3.2 Project Website	Maintaining publication of docs (A-3.2.2)
T3.3 Age assurance providers	**TASK COMPLETED** but ongoing engagement activity under T3.1
T3.4 Relying parties	**TASK COMPLETED** but ongoing engagement activity under T3.1
T3.5 Parental Consent/Control	Issuing Call for Participants – parental consent/control stakeholders (A-3.5.3)
T3.6 Gathering practice statements	**Collation of Practice Statements (D-3.6)**
T3.7 Test subjects	**TASK COMPLETED** but ongoing engagement activity under T3.1
WP4: Evaluation Activity	WP Lead : Dr Mark Pederson & Dr Kelvin Ross
T4.1 Age verification technologies	Technology Readiness Assessments (A-4.1.5); Qualitative Analysis (A-4.1.6)
T4.2 Age estimation technologies	Technology Readiness Assessments (A-4.2.5); Outcome Error Parity (A-4.2.6); Qualitative Analysis (A-4.1.7)
T4.3 Age inference technologies	Technology Readiness Assessments (A-4.3.5); Qualitative Analysis (A-4.3.6)
T4.4 Successive validation	Comparative Analysis (A-4.4.3); Technology Readiness Assessments (A-4.4.4); Qualitative Analysis (A-4.4.5)
T4.5 Parental Consent/Control	Comparative Analysis Consent (A-4.5.4) Control (A-4.5.5); TRA (A-4.5.6); Qualitative Analysis (A-4.5.7)
T4.6 Technology stack deployments	Qualitative Analysis (A-4.6.5 & A-4.6.7); Technology Readiness Assessments (A-4.6.6)
T4.7 Technology readiness	Technology Readiness Assessment (A-4.7.1); Market Wide Analysis (A-4.7.2)
T4.8 Implementation factors	Implementation Factors (A-4.8.1)
T4.9 Remedial Evaluation	Remedial Evaluations (A-4.9.1)
WP5: Evaluation Reporting	WP Lead: Rhianne Kiddle
T5.1 Data Gathering	Collation of Reports from Workstreams (A-5.1.2); Creation of Graphic Assets, Tables & Contents (A-5.1.3)
T5.2 Indicators of confidence	Reporting of Analysis (A-5.2.1)
T5.3 Preliminary Report	Implementing Content for the Preliminary Report (A-5.3.1); Stakeholder Reviews (A-5.3.2); Remedials (A-5.3.3)
T5.4 Final Report and Summary	*No activity yet*
WP6: Project Management & Risks	WP Lead: Keith Robinson (subject to review)
T6.1 Project Plan	**TASK COMPLETED**
T6.2 Project Quality Control/PM2	Maintain Issue Log (A-6.2.3); Maintain Change Log (A-6.2.4); Mid Project Quality Review (A-6.2.5)
T6.3 Risk Management Plan	Maintain Risk Log (A-6.3.1);
T6.4 Contract Management Meetings	PM Meetings (A-6.4.2); DITRDCA Meeting (A-6.4.3)
T6.5 Project Compliance	Compliance Monitoring (A-6.5.1); Finance Monitoring (A-6.5.2)
T6.6 Review & Evaluation	Maintain performance monitoring, project tasking approach (A-6.6.1)

Month Profile – April 2025 [M6]

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

Month Profile – May 2025 [M7]

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

Month Profile – June 2025 [M8]

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

From: Tony Allen s 47F @accscheme.com>
Sent: Friday, 15 November 2024 7:48 PM
To: Julie Inman Grant
Cc: s 22 ; s 47F ; s 22
Subject: Re: Age Assurance Technology Trial [SEC=OFFICIAL]

Hi Julie,

I could do 4.30 this afternoon. Where would be a good place to meet for you?

Best Regards

Tony

Sent from my I-Phone

On 15 Nov 2024, at 08:31, Julie Inman Grant s 47E(d) @esafety.gov.au> wrote:

OFFICIAL

Tony and s 47 – This is such great news. Believe it or not I am in London right now – I have a spot at **4:30pm this afternoon** if you're here (doubtful and last minute) but letting you know that the end of November is horrendous schedule-wise for me and I will not be in Sydney on the dates that you are here or in Canberra when you are there but I will be sure to dispatch relevant members of my team.

Thanks for sending through the project plan – I'll read with great interest. I'm sure you have read about the Government's proposed social media ban legislation, that has not yet been introduced. But since you are working closely with the Department from here on out, they can fill you in on the contours of that when it's public. eSafety will ultimately be the "implementers" when this is passed so all the work that you do in this space will be invaluable to that stage of the process.

I'm sorry I didn't reach out earlier – I was here for GOSRN so have been pretty deeply ensconced in the regulator work!

All the best

Julie

From: Tony Allen s 47F @accscheme.com>
Sent: Friday, November 15, 2024 10:25 AM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 ; s 47F

s 47F @avpassociation.com>
Subject: Age Assurance Technology Trial

Some people who received this message don't often get email from s 47F @accscheme.com. Learn why this is important

Hi Julie,

I hope that you are well.

I'm delighted to be able to officially confirm that we have been awarded the tender for the Age Assurance Technology Trial, working with our partners at KJR and a global team of unrivalled experts. The Trial is on the back of your sterling work to enhance the protection of children from online harm including through effective, robust age assurance processes.

You are at the very top of my list of people and organisations that I need to engage with as I lead this trial. I'm pleased to be able to attach for you the full detailed project plan and we already have planned an initial stakeholder event in Canberra on 28th November at 2.30pm AEDT (Age Assurance Technology Trial - Stakeholder Event - Nov 28 | RingCentral Events).

I'll be there all week and I'd love to meet with you and the team in advance of that. I am in Sydney on the Monday (25th) before heading down to Canberra for 26th to 29th and then off to Perth from 29th to 2nd. I understand from Iain that you may be around Sydney and I'd be happy to meet there if you're available. Or we could meet whilst I'm in Canberra. I am sure that you and the team have so much that you want to share with me on your vision for this Technology Trial and we're so excited to get started.

You'll see from the project plan that we have established a fabulous and eminent team to lead this work for the Australian Government.

I look forward to hearing from you and the team soon.

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F @accscheme.com

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s 47F |
<image004.png>
s 47F @accscheme.com |
<image005.png>
www.accscheme.com |
<image006.png>
@agecheckcert

<image007.png>
<image008.png>

<image009.png>

<image010.png>

https://www.linkedin.com/in/tonyallenctsp/
<image012.jpg>

Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

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From: Tony Allen s 47F @accscheme.com>
Sent: Saturday, 7 December 2024 8:23 PM
To: Julie Inman Grant; s 47F
Cc: s 22
Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Hi Julie,

My first full day back in the UK today. Thank you for your email.

Yes, I completely agree and I think we should try to get the dates in the diary now for the duration of the trial.

The week of the 16th will also be fine. My EA is s 47F so hopefully someone from your team can liaise with her over the dates. Our policy on the Age Assurance Technology Trial is for meetings to take place at Australia-friendly office times, so do not worry if it is late or early for me.

I will hope to be able to share with you the final draft evaluation plan by that week. Our milestone is to complete that by the end of this month.

Although there is plenty going on in the meantime, our next full plenary week will be in Sydney w/c 3rd February. We are also confirming that our April stakeholder event will take place as a part of the Global Age Assurance Standards Summit in Amsterdam on 8th to 10th April. The theme for the Summit is "Using Global Standards to help Local Regulations Work Well". I think that will also be a fantastic opportunity for your consultations and engagement with the industry.

I think, in mutual respect of our independence and roles, it may be appropriate to draw up an MoU. I'd be happy to work on a draft. It doesn't have to be anything major, but I feel it may protect us both in the future.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 07 December 2024 01:30
To: s 47F @avpassociation.com>; Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Hello s 47F and Tony -

I hope your first stakeholder meeting went well. I've been in-touch with s 47F and we will have observers on the stakeholder group - as the regulator, we are going to need to engage in our own consultation processes and "continue building while we fly the AV plane!"

I was thinking it would be very useful - and necessary - to have monthly debrief and information sharing sessions with you because all of your work will deeply inform ours! You have also probably seen some of the amendments so possible limitations laid out now in the implementation so I'm sure that is on your roadmap!

I'm on the way to DC now but will be in Melbourne the week of the 16th. Any chance we can tee up a call that week and then discuss future cadence and content?

I'm aware you probably have everyone banging down your door!

But let us know if a VC is possible and s 22 can lock in from our end!

All the best,

Julie

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From: s 47F @accscheme.com>
Sent: Tuesday, 17 December 2024 1:52 AM
Subject: Global Age Assurance Standards Summit 2025
Attachments: National Delegations Brochure.pdf

You don't often get email from s 47F @accscheme.com. Learn why this is important

Hi,

I am contacting you because we think you may be interested in attending our next Global Age Assurance Standards Summit which is taking place 8-10th April 2025 in Amsterdam.

I have attached a copy of the national delegations brochure, which has now been published!
We're looking to secure delegations ahead of the summit and we would greatly appreciate your help in finding the right people to fill these roles within your delegation country, if you could direct me to them or them to me, it would be greatly appreciated!

We're looking for each country to have all these delegation roles filled, with the idea that each country has a team of the following delegations.... (more details in the attached brochure)

- **A Head of Delegation -** Someone with the National Gravitas to coordinate the delegation throughout the Summit. We would also welcome the appointment of a deputy head of delegation.
- **Privacy or Data Regulators Privacy or Data Regulators -** Delegate(s) from National Regulators responsible for Data Protection & Privacy Laws Delegate(s) from National Regulators responsible for Data Protection & Privacy Laws
- **Content Regulators -** Delegate(s) from National Regulators for Online Safety, Harms or Content
- **Age Restricted Product Regulators -** Delegate(s) for Regulation of Restricted Products (like Alcohol, Tobacco, Weapons, etc)
- **National Standards Bodies -** Delegate(s) from National Standards Bodies – such as ISO/IEC P-Members
- **National Accreditation Bodies -** Delegate(s) from National Accreditation Bodies (such as IAF, ILAC Member Bodies)
- **Age Assurance Policy Leaders -** Delegate(s) from National Government Departments responsible for Age Assurance Policy & Leadership
- **Police/CSAM/ Law Enforcement** - Delegate(s) from Police or Bodies Responsible for tackling Child Sexual Exploitation or Abuse
- **Top Relying Parties** - Delegate(s) from the Top 3 or 4 National Businesses that use or want to use age assurance services
- **Non-Governmental Organisations** - Delegate(s) from NGOs with particular policy interest in age assurance
- **Age Assurance Service Providers -** Delegate(s) from AASPs based in the country
- **Other Interested Parties Any other -** Delegate(s) that, in the opinion of the Head of Delegation, can add value to the discussion and debate about age assurance standards & policy

if you have any questions, please don't hesitate to ask! We look forward to hopefully seeing you at the Global Age Assurance Standards Summit in April!

Many thanks,

s 47F

Executive Assistant

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK

eSafety FOI 25143
Document 32 of 75

Age Check
Certification Scheme

Global Age Assurance Standards Summit 2025

Amsterdam | NL | 8 -10 April

GUIDE FOR NATIONAL DELEGATIONS

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Introduction to the Global Age Assurance Standards Summit 2025

As we approach publication of ISO/IEC 27566-1 – Age Assurance Systems – Part 1: Framework during 2025, the Global Age Assurance Standards Summit will be building on the success of the inaugural Summit in Manchester in 2024 with a spectacular gathering of age assurance policy professionals from across the world.

The main event is at the fabulous **Mövenpick Hotel in Central Amsterdam** – right next to the Central Station in the heart of the city.

94%

of all 2024 attendees said they would recommend the event

★ ★ ★ ★ ★

© Age Check Certification Scheme

Last Year's Global Age Assurance Standards Summit, Manchester 2024

Click the link to view our compendium of sessions, slide-decks & materials from 2024 Manchester Summit.

"This Summit is a really key landmark in the evolution and maturity of the age assurance industry."

Julie Dawson
Chief Regulatory and Policy Officer
Yoti

The aim of the Summit is to...

Explore the role of global age assurance standards in helping local regulations to work well.

The Summit will be focussed on national delegations from the **G20 Group of Nations, the European Union, the African Union and the Global South.**

This document establishes guidelines for nations on creating a delegation to attend the Summit, how the programme is intended to work and the benefits for nations in participating in the Summit.

2024 Global Summit | Manchester

Which countries can form a National Delegation

We are issuing a call for National Delegations for the Summit. All countries are invited to participate, but we are particularly interested in securing delegations from:

The G20 Group of Countries

AUSTRALIA, ARGENTINA, TURKEY, JAPAN, CANADA, GERMANY, BRAZIL, UK, SOUTH AFRICA, FRANCE

ITALY, SAUDI ARABIA, INDIA, INDONESIA, CHINA, MEXICO, EU, SOUTH KOREA, USA

** Due to current sanctions in the European Union, we are unable to accept a National Delegation from Russia*

The European Union

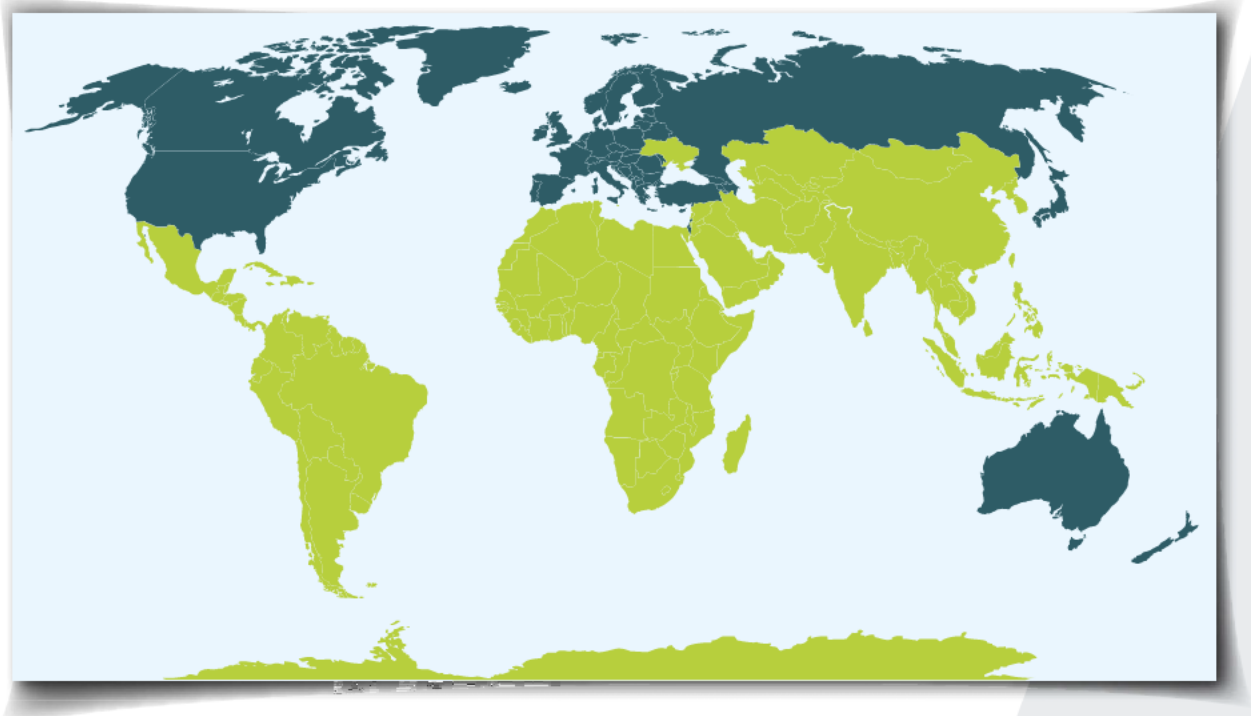
PORTUGAL, FRANCE, SPAIN, SWEDEN, SLOVENIA, BULGARIA, FINLAND, GERMANY, DENMARK, NETHERLANDS

ROMANIA, LATVIA, CZECHIA, POLAND, IRELAND, LITHUANIA, CYPRUS, AUSTRIA, GREECE, BELGIUM

LUXEMBOURG, CROATIA, ESTONIA, ITALY, SLOVAKIA, MALTA, HUNGARY

Countries of the Global South

We are particularly keen to welcome delegations from the Global South



Who should be in the National Delegation

A Head of Delegation
Someone with the National Gravitas to coordinate the delegation throughout the Summit. We would also welcome the appointment of a deputy head of delegation.

Age Assurance Policy Leaders
Delegate(s) from National Government Departments responsible for Age Assurance Policy & Leadership

Privacy or Data Regulators
Delegate(s) from National Regulators responsible for Data Protection & Privacy Laws

Police/CSAM/ Law Enforcement
Delegate(s) from Police or Bodies Responsible for tackling Child Sexual Exploitation or Abuse

Content Regulators
Delegate(s) from National Regulators for Online Safety, Harms or Content

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Any other Delegate(s) that, in the opinion of the Head of Delegation, can add value to the discussion and debate about age assurance standards & policy

Tony Allen
Executive Director
Age Check Certification Scheme

"It is our pleasure to host the world's thought leaders on age assurance technologies in Amsterdam. Only by bringing these stakeholders together can we ensure the standards we are leading can be fit for the real world."

© Age Check Certification Scheme

What will the Delegations be doing

The Summit is structured around three themed days, each of which will start with a briefing for all of the Heads of Delegation.

Our main **200-seat** plenary round-table meeting room will be hosting a series of debates and discussions aimed at contribution to the Summit Communiqué.

TUES 8th April	WED 9th April	THURS 10th April
GLOBAL BLOCKS	**THEMATIC REGULATION**	**STAKEHOLDERS**
G20 Plenary Session	**Data/Privacy Regulation**	**Global Age Assurance Service Providers**
Examining the role of age assurance in a global context for the largest nations.	Deployment of age assurance for age appropriate design, privacy and children's data consent & choice.	Breadth and range of approaches to age assurance around the world.
EU Plenary Session	**Online Safety Regulation**	**Relying Parties**
The development of age assurance policy in the European Context, the EUDI, the DSA and AI Regulation.	Use of age assurance for content restrictions or prevention of online harms.	Understanding the complexities and needs of users or age assurance services.
Global South Plenary Session	**Product Regulation**	**Community of Interest**
The role of age assurance in the developing world and the Global South.	Employing age assurance in online and offline retail sale of age restricted goods, such as alcohol, tobacco, weapons, etc.	Developing the collective calls from NGO's, charities and advocacy groups for enhanced age assurance measures.

RUNNING OVER THE 3 DAYS

THE MINI THEATRES

Over 140 Mini Theatres spread over the three days in one of three theatres each seating up to 30 delegates.

The Mini Theatres are an opportunity to explore particular policy issues in detail, understand the complex landscape or examine different tech.

THE TECH SHOWCASE

A huge showcase of 36 age and ID assurance service providers and ancillary services, with short, sharp 15 minute briefings

Individual interactive and touchscreen tech pods allowing delegates to explore different products, services and approaches to age assurance.

NATIONAL ROUND-TABLES

Each National Delegation will hold their own closed 1-hour round-table meeting to explore age assurance from a national viewpoint

The National Delegations will be invited to contribute to the Summit Communiqué and to establish how standards can help local regulations.

Forming a National Delegation

Our **Global Policy & Projects Officer**, ***Rhianne Kiddle*** is happy to help you bring together your **National Delegation** from our network of contacts around the world.

We are able to welcome 48 delegations to this global event

Contact us about helping to form your national delegation. We already have expressions of interest from various participants all over the world. Last year, we had **53 countries represented** and more than **700 delegates remote – with over 200 in person**.

See the following 2 pages for 2024 Manchester event stats.

Delegate Fees are as follows:

ATTENDEE DESCRIPTION: IN-PERSON RECOMMENDED	COST
Public Administration, Law Enforcement & Public Officials	FREE
Age Assurance Service Providers & Intermediaries	**€300** *(Inc. VAT/BWT)*
Relying Parties or Other Delegates	**€200** *(Inc. VAT/BWT)*
Charities/NGOs/Advocacy Groups	**€100** *(Inc. VAT/BWT)*
ATTENDEE DESCRIPTION: REMOTE	**COST**
All virtual delegates only	**50%** Discount on the above fees

Event sponsors will also receive an allocation of **FREE** and **HALF PRICE** delegate passes commensurate with their level of sponsorship.

Mövenpick Hotel
Piet Heinkade 11
1019 BR
AMSTERDAM
Netherlands

Get in touch
gaass@accscheme.com

Global Summit Manchester 2024 Statistics

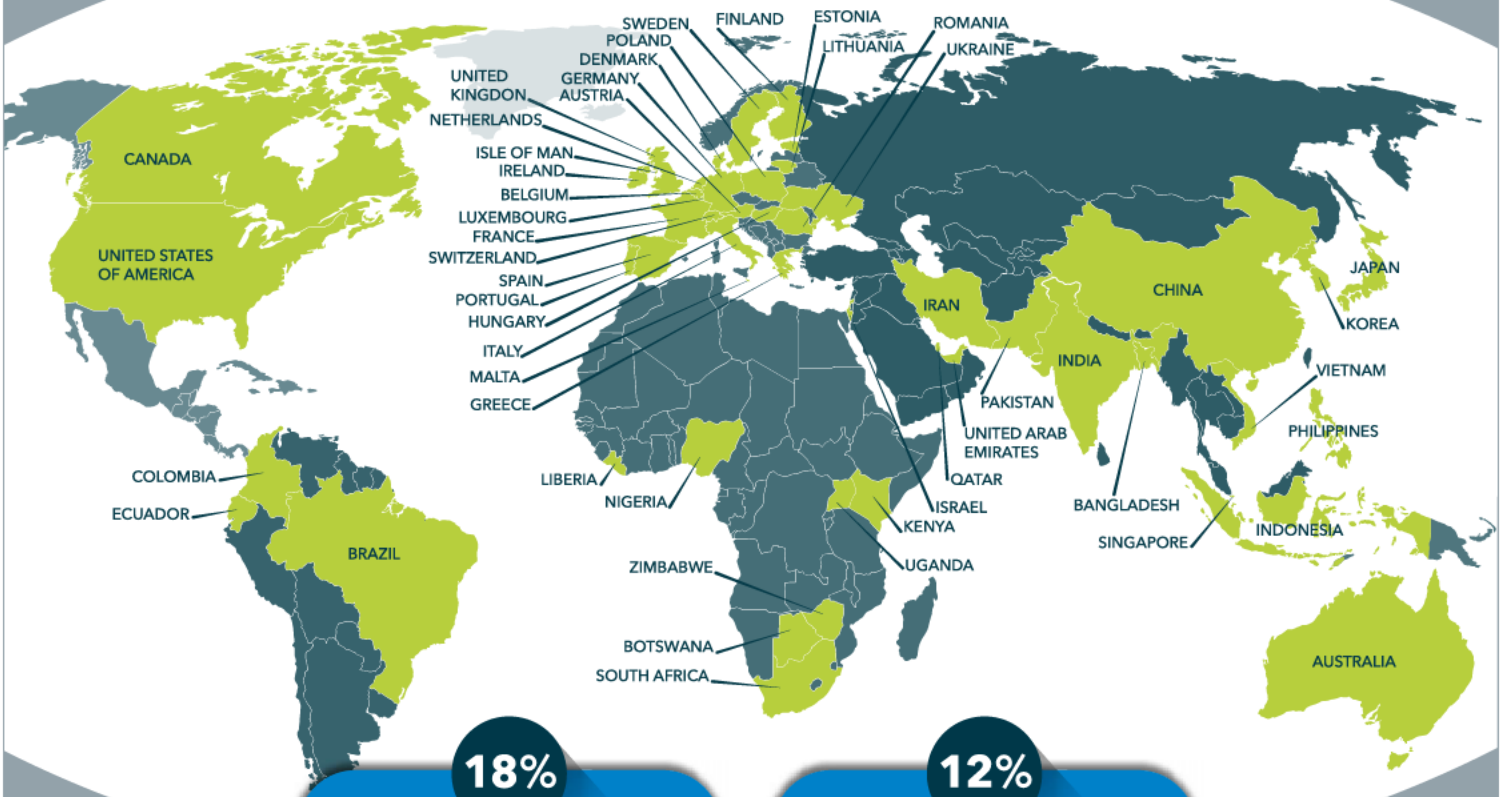
102 Expert speakers

709 Registered delegates

212 Attended in person

424 Attended online

Delegates from **53** countries



18%

of Attendees were C-Suite

having the title 'Chief' 'Founder,' 'Director' or 'President'

12%

of delegates were from Governments or Regulators

Global Summit 2024 Statistics Continued

119 delegates from **age assurance service providers**

74 delegates from **ISO/ IEC JTC 1/SC 27/WG 5 working groups**

37 delegates from **'relying parties'** or **'age assurance service users'**

14 of the **Top 20 global online platforms** had representatives attending

Click the link to view our compendium of sessions, slide-decks & materials from 2024 Manchester Summit.

Over 9h

is the average time spent by attendees online at the event

Over 77h

of videos of sessions, panels and debates

Peak online audience of 124 for the keynote address from Marija at SafeOnline

94%

of all attendees said they would recommend the event

★ ★ ★ ★ ★

227 Sessions over **5 days**

22 Video Interviews of Delegates

Organiser's Digital files **1,921** over **341** folders

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Internationally recognised standards

Our scheme provides evidence that identity and age check practices meet international standards.

Highly qualified certification officers

Our locally trained certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check Certification Scheme

www.accscheme.com

Unit 321, Broadstone Mill,
Broadstone Rd, Reddish,
Stockport, SK5 7DL, United Kingdom

gaass@accscheme.com

+44 (0) 1614 434111

Subject: AV/ eSafety Briefing [SEC=OFFICIAL]
Location: Microsoft Teams Meeting

Start: Thu 19/12/2024 5:00 PM
End: Thu 19/12/2024 5:45 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Julie Inman Grant
Required Attendees: s 47F @avpassociation.com; Tony Allen s 47F @accscheme.com>; s 22 s 47F @accscheme.com>; s 22

Categories: External Meetings

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 456 924 712 605

Passcode: Yy3aj7oj

Dial in by phone

+61 2 9161 1238,,131934739# Australia, Sydney

Find a local number

Phone conference ID: 131 934 739#

Join on a video conferencing device

Tenant key: esafety@m.webex.com

Video ID: 137 588 894 6

[More info]

For organizers: [Meeting options] | [Reset dial-in PIN]

[Privacy and security]

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: Saturday, 21 December 2024 1:34 PM
To: Tony Allen; s 47F
Cc: s 22
Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Dear Tony s 47F :

Thanks so much for your time last week at such an inconvenient hour. I've copied s 22 , our head of legal services and do think an MOU is worthwhile. Appreciate your bringing us along on this comprehensive project as "we build the plane as we fly it"!

We'll take a look at the project plan early next week and let you know if we have any substantive comments. No one can claim that this project will not be comprehensive!

Julie

From: Tony Allen s 47F @accscheme.com>
Sent: Friday, December 20, 2024 9:50 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>; s 47F @avpassociation.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Hi Julie,

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There are a couple of things arising from that meeting.

1. An MoU or similar document. Please do let me have the contact details of the person on the call yesterday that you would like me to discuss this with.
2. I promised you early sight of the Evaluation Design Report. I will have that for you and the team in the first week of January.
3. I also promised you early sight of the Report Structure. This is not due to be completed until February, but I am happy to share with you (attached) the skeleton structure and I would welcome any comments that you or the team have on it.

May I take this opportunity to wish you and your team a Happy Christmas and wonderful New Year.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 07 December 2024 01:30
To: s 47F @avpassociation.com>; Tony Allen s 47F @accscheme.com>

Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
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Hello s 47F Tony -

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I was thinking it would be very useful - and necessary - to have monthly debrief and information sharing sessions with you because all of your work will deeply inform ours! You have also probably seen some of the amendments so possible limitations laid out now in the implementation so I'm sure that is on your roadmap!

I'm on the way to DC now but will be in Melbourne the week of the 16th. Any chance we can tee up a call that week and then discuss future cadence and content?

I'm aware you probably have everyone banging down your door!

But let us know if a VC is possible and s 22 can lock in from our end!

All the best,

Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 6 January 2025 8:05 AM
To: Julie Inman Grant; s 47F
Cc: s 22

Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]
Attachments: DRAFT D-2.9 Evaluation Proposal Report (Shared with eSafety 20241230) JIG - AA comments.docx; [FINAL] D-2.9 Evaluation Proposal Report.docx

Hi Julie,

Thank you for your feedback. s 47F as work package lead for WP2 has provided some comments on your feedback in the attached for your reference.

We have today submitted for external validation by s 47F at UNSW our Evaluation Proposal incorporating many of your comments and with additional material. This is now attached. We have also submitted this to the Department for Infrastructure too.

This does not mean that it is too late for comments. We will continue to iterate this version in line with comments we receive back from you, OAIC, s 47F and the Department as we work towards a final publishable version by the end of the month.

I am very grateful for your useful and insightful comments.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 03 January 2025 04:59
To: Tony Allen s 47F @accscheme.com>; s 47F @avpassociation.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

No problems Tony, thank you for providing us with the opportunity.

I'm in conversation with s 47F on a few other matters and I think we can probably get a technical overview next week - I do not anticipate that these will be seismic and we, of course, have tremendous confidence in s 47F technical Nina sides and likely approach.

Thanks for that on parental consent/controls. As noted in comments, may be useful for some of our other schemes and education efforts but keeping the AA results separate from the PCC results I think will be important from a public messaging and clarification perspective.

Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Friday, January 3, 2025 3:51:46 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>; s 47F @avpassociation.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Hi Julie,

Thank you for these comments, which are hugely appreciated. We continue to work on the report.

Timetable wise –

My plan is to send it over to s 47F later this evening (AU Time). I also plan to send it over to s 47F at some point in the next day or so. They then have a week to check and validate it and we can continue to make changes. Once we have s 47F sign off, I think our changes need to be limited to editorial rather than anything technical or anything that could affect his validation. That having been said, il am sure that he would be open to suggestions from your team.

We need to have a final copy for print by 23rd Jan. It will be released the week after and formally published at the Stakeholder Event on 6th Feb.

Also, on your question about parental consent/control – yes these are in scope for the project (notwithstanding my protestations that they are not age assurance).

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 03 January 2025 00:48
To: Tony Allen s 47F @accscheme.com>; s 47F @avpassociation.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Tony – Thanks so much for providing in advance. I have reviewed in its entirety but the specialist members of my team have not and that is largely because any of them are on leave (I think you know that January for Australians is like August for Europeans)! I'm impressed with how thorough and well-developed your collective thinking and planning on this is.

I guess I'd ask when the last possible time for incorporated feedback? A handful of us will be back on Monday but the majority the week following. I'll have s 22 disseminate according to their teams and we will get you further input next week so just think of this input as very preliminary!

All the best and happy new year!

Julie

From: Tony Allen s 47F @accscheme.com>
Sent: Tuesday, December 31, 2024 6:23 AM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>; s 47F @avpassociation.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Monthly AV- eSafety Briefings [SEC=UNOFFICIAL]

Hi Julie,

I hope that you and your team all had an enjoyable Christmas and are looking forward to the New Year.

I promised in our call to try to get draft documents to you roughly a week or so before they are finalised and with that in mind, please find herewith the current draft of the evaluation proposal report. This document represents the culmination of Work Package 2 on Evaluation Design. You will see in the attached that it remains a work-in-progress, so I would ask you and the team to maintain confidentiality of this version.

The timetable from here is that the project team are aiming to resolve the remaining comments and issues with the document from our perspective by this Friday. It will then be formally submitted to s 47F for independent review. It will also be submitted to the Dept for Infrastructure on Friday too. We aim to get approval for it by a week on Friday (i.e. 10th January). That marks the completion of the milestone.

The call for participants will then be formally opened and the document will be formally published at the Stakeholder Engagement Event we have in Sydney on 6th February. Regarding that, if you or any of your team want to come to that event/dial in, they can reserve a ticket at events.ringcentral.com/events/age-assurance-technology-trial-stakeholder-event-d8385da0-1349-4341-b4b4-b6cfa9fc414f.

I would also like to get a date in the diary for any time that week to meet with you again whilst we are in Sydney.

Please do feel free to comment on the draft. If you or the team can get comments to me before Friday, we can take them into account before we submit it for validation and approval. If not, though (and I do appreciate the holiday season), then we can still pick up comments next week.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 21 December 2024 01:34
To: Tony Allen s 47F @accscheme.com>; s 47F @avpassociation.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22

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Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
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Julie

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NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.
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From: s 22
Sent: Wednesday, 8 January 2025 9:40 AM
To: Tony Allen
Subject: RE: Age Assurance Technology Trial - Final Report Publication [SEC=OFFICIAL]

OFFICIAL

Thanks Tony, I have passed this on to the Commissioner's team to flag for her diary.

Kind regards,
s 47F

s 47F

s

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: Tony Allen s 47F @accscheme.com>
Sent: Tuesday, January 7, 2025 8:09 PM
To: s 22 @esafety.gov.au>
Subject: Age Assurance Technology Trial - Final Report Publication

Hi s 22 ,

Please can I add a diary date for Julie Inman Grant if it works for her diary. At the moment, it is likely that we will be publishing the final report on the Age Assurance Technology Trial in the Mural Hall at the Australian Parliament in Canberra at 2pm on Thursday 26th June 2025. This is tentative at the moment, but I wanted to flag it to you as a potentially important date for Julie's diary.

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | Abbie Witkowski s 47F @accscheme.com

s 47F | s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme | Age Appropriate Design Certification Scheme | Digital Identity Certification | Data & Privacy

LinkedIn https://www.linkedin.com/in/tonyallenctsp/

Roles:

Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

From: s 47F @accscheme.com>
Sent: Thursday, 9 January 2025 1:15 AM
Subject: Global Age Assurance Standards Summit 2025
Attachments: Event Sponsorship Brochure.pdf

Categories: AV

You don't often get email from s 47F @accscheme.com. Learn why this is important

Hello,

Happy New Year! I hope your 2025 has got off to a great start.

I am contacting you because we think you may be interested in participating in our next Global Age Assurance Standards Summit, which is taking place in Amsterdam, between 8th – 10th April 2025.

You can register to attend the summit (in person or online) using this link - https://events.ringcentral.com/events/global-age-assurance-standards-summit-2025

I have attached a copy of the National Delegations Brochure, just in case you haven't seen it yet.

With the Summit now just a few months away, we are looking to secure Delegations and would greatly appreciate your help in finding the right people. Specifically, we are looking for each delegation country to have the following roles filled:

- A Head of Delegation - Someone with the National Gravitas to coordinate the delegation throughout the Summit. We would also welcome the appointment of a deputy Head of Delegation.
- Privacy or Data Regulators Privacy or Data Regulators - Delegate(s) from National Regulators responsible for Data Protection & Privacy Laws
- Content Regulators - Delegate(s) from National Regulators for Online Safety, Harms or Content
- Age Restricted Product Regulators - Delegate(s) for Regulation of Restricted Products (like Alcohol, Tobacco, Weapons, etc)
- National Standards Bodies - Delegate(s) from National Standards Bodies – such as ISO/IEC P-Members
- National Accreditation Bodies - Delegate(s) from National Accreditation Bodies (such as IAF, ILAC Member Bodies)
- Age Assurance Policy Leaders - Delegate(s) from National Government Departments responsible for Age Assurance Policy & Leadership
- Police/CSAM/ Law Enforcement - Delegate(s) from Police or Bodies Responsible for tackling Child Sexual Exploitation or Abuse
- Top Relying Parties - Delegate(s) from the Top 3 or 4 National Businesses that use or want to use age assurance services
- Non-Governmental Organisations - Delegate(s) from NGOs with particular policy interest in age assurance
- Age Assurance Service Providers - Delegate(s) from AASPs based in the country

- Other Interested Parties Any other - Delegate(s) that, in the opinion of the Head of Delegation, can add value to the discussion and debate about age assurance standards & policy

If you believe you could help with this, and would like to form a delegation for your country, then please do get in contact. Similarly, if you know anybody who may be suitable for a particular role within a delegation, then do let us know.

If you have any questions, please don't hesitate to ask. We look forward to building your country's delegation and welcoming you at the Global Summit in April!

Many thanks,

s 47F

Executive Assistant

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK

eSafety FOI 25143
Document 38 of 75

Age Check
Certification Scheme

Global Age Assurance Standards Summit 2025

Amsterdam | NL | 8 -10 April

SPONSORSHIP BROCHURE

© Age Check Certification Scheme

Introduction to the Global Age Assurance Standards Summit 2025

As we approach publication of ISO/IEC 27566-1 – Age Assurance Systems – Part 1: Framework during 2025, the Global Age Assurance Standards Summit will be building on the success of the inaugural Summit in Manchester in 2024 with a spectacular gathering of age assurance policy professionals from across the world.

The main event is at the fabulous **Mövenpick Hotel in Central Amsterdam** – right next to the Central Station in the heart of the city.

94%

of all 2024 attendees said they would recommend the event

★ ★ ★ ★ ★

© Age Check Certification Scheme

Last Year's Global Age Assurance Standards Summit, Manchester 2024

Click the link to view our compendium of sessions, slide-decks & materials from 2024 Manchester Summit.

"This Summit is a really key landmark in the evolution and maturity of the age assurance industry."

Julie Dawson
Chief Regulatory and Policy Officer
Yoti

The aim of the 2025 Summit is to...

Explore the role of global age assurance standards in helping local regulations to work well.

The Summit will be focussed on national delegations from the **G20 Group of Nations, the European Union, the African Union and the Global South.**

The 2025 Global Summit on Exploring the Role of Global Age Assurance Standards is a pivotal event aimed at fostering collaboration and driving meaningful change to enhance children's online safety. We are bringing together delegates from across the globe–industry leaders, policymakers, researchers, and child safety advocates–to speak, debate, and collaborate on this critical mission.

2024 Global Summit | Manchester

© Age Check Certification Scheme

Global Delegates - Who Will Be Attending?

All countries are invited to the Global Summit but we are delighted to invite the following countries. Each country will send up to 10 experts from diverse fields. The event offers a unique opportunity to network with global leaders in safeguarding children:

The G20 Group of Countries

AUSTRALIA, ARGENTINA, TURKEY, JAPAN, CANADA, GERMANY, BRAZIL, UK, SOUTH AFRICA, FRANCE

ITALY, SAUDI ARABIA, INDIA, INDONESIA, CHINA, MEXICO, EU, SOUTH KOREA, USA

** Due to current sanctions in the European Union, we are unable to accept a National Delegation from Russia*

The European Union

PORTUGAL, FRANCE, SPAIN, SWEDEN, SLOVENIA, BULGARIA, FINLAND, GERMANY, DENMARK, NETHERLANDS

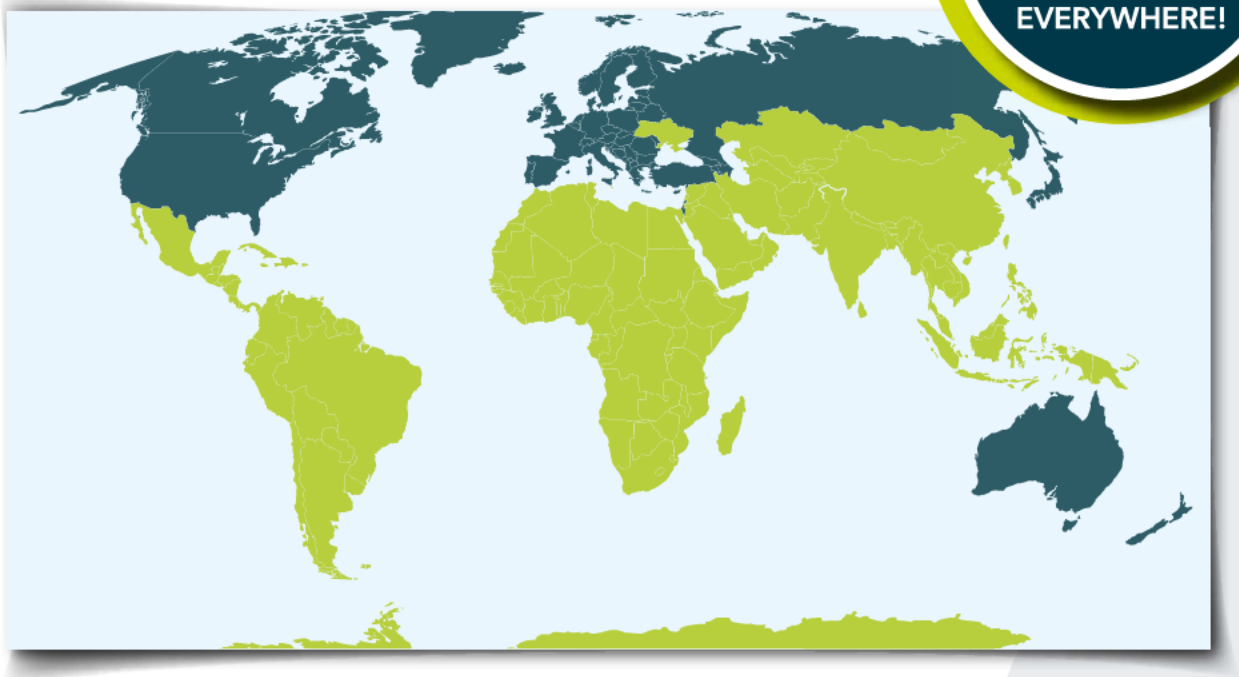
ROMANIA, LATVIA, CZECHIA, POLAND, IRELAND, LITHUANIA, CYPRUS, AUSTRIA, GREECE, BELGIUM

LUXEMBOURG, CROATIA, ESTONIA, ITALY, SLOVAKIA, MALTA, HUNGARY

Countries of the Global South

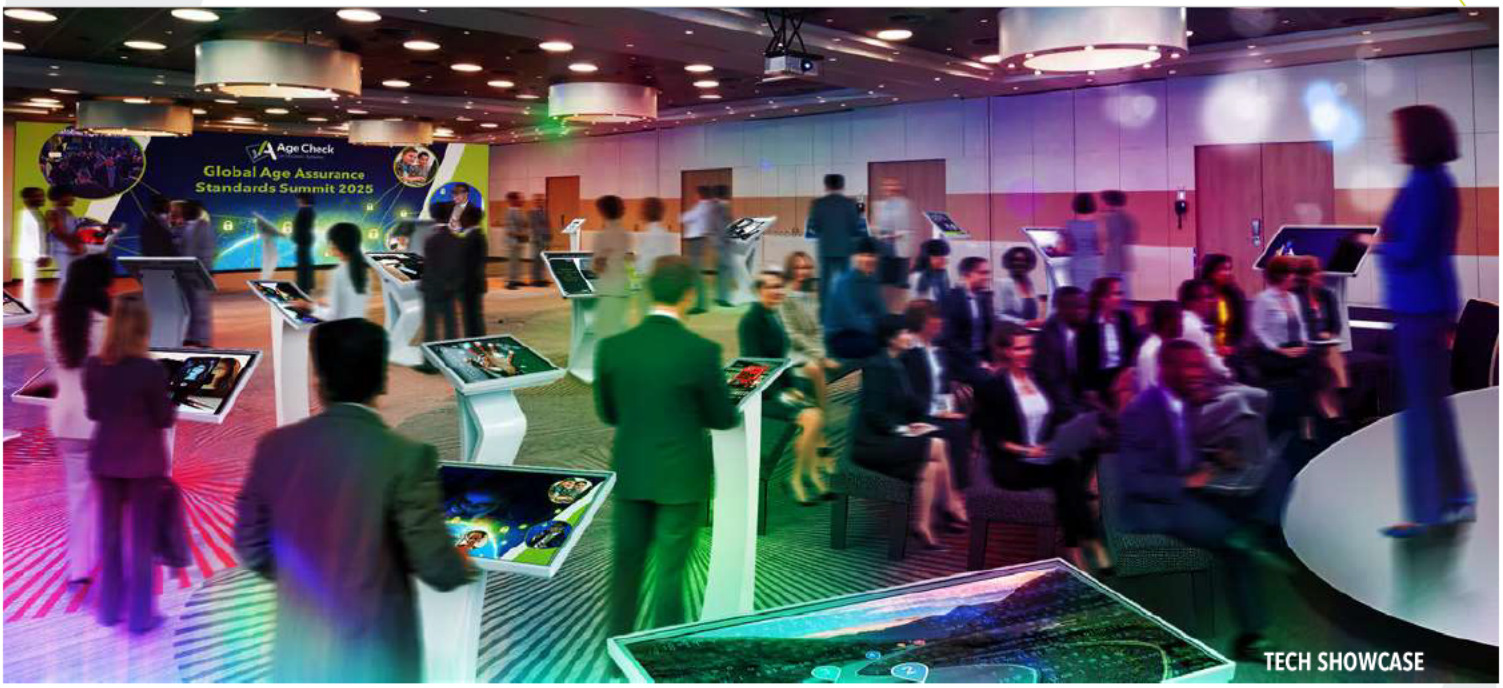
We are delighted to be inviting delegations from the Global South.

JOIN US TO SHAPE THE FUTURE OF ONLINE SAFETY FOR CHILDREN EVERYWHERE!

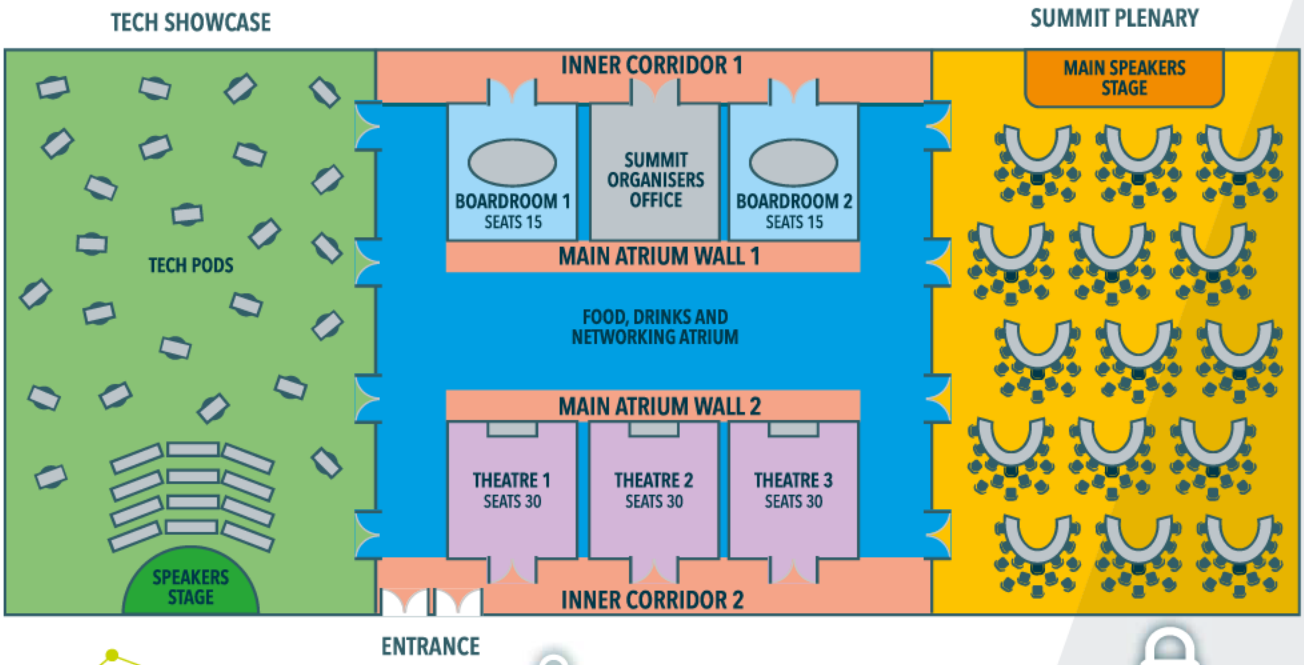


Inside the Event...

The event is thoughtfully designed across five distinct spaces, each offering unique opportunities for sponsors and visitors alike. The **Tech Showcase** features tech pods, interactive presentations, and a speaker stage for engaging showcase sessions. The **Summit Plenary** hosts keynote speakers and seating for country delegates. Three **Mini Theatres** provide focused, topic-specific presentations, while two **Boardrooms** facilitate team collaboration and in-depth discussions. Finally, the **Networking Atrium** offers a relaxed environment for informal connections and socializing, ensuring a dynamic experience for all participants.



Event Floor Plan



How to get involved

The following pages outline a range of exclusive sponsorship opportunities available at this exciting event. These packages are limited and offer a unique chance to showcase your commitment to improving online safety for children. Don't miss it – reach out today to secure your spot and be part of this transformative initiative!

Take advantage of our fantastic early bird discounts!...

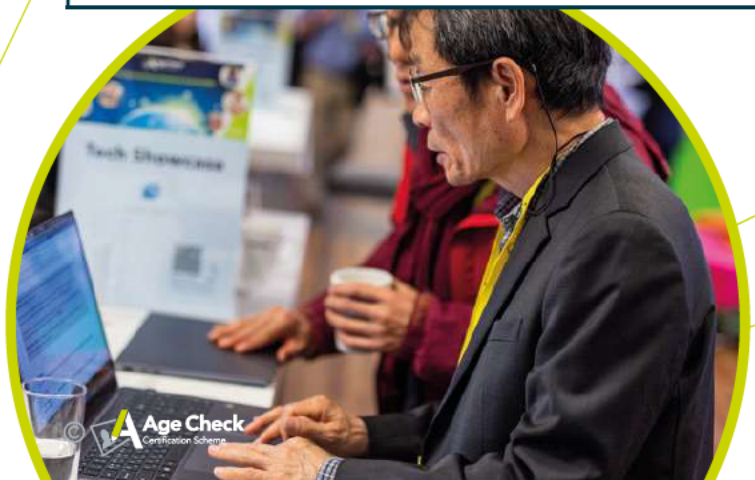
**All of the packages in this brochure must be booked and paid for before the deadline. Prices are + BTW (Dutch VAT at 21%)*

*** We offer 50% discount for bookings before 31st Jan 2025**

*** We offer 25% discount for bookings before 28th Feb 2025**

Delegate Ticket Prices

ATTENDEE DESCRIPTION: IN-PERSON RECOMMENDED	COST
Public Administration, Law Enforcement & Public Officials	**FREE**
Age Assurance Service Providers & Intermediaries	**€300** *(Inc. VAT/BWT)*
Relying Parties or Other Delegates	**€200** *(Inc. VAT/BWT)*
Charities/NGOs/Advocacy Groups	**€100** *(Inc. VAT/BWT)*
ATTENDEE DESCRIPTION: REMOTE	**COST**
All virtual delegates only	**50%** Discount on the above fees



Premium Packages

We are excited to offer three carefully curated sponsorship packages – **Platinum**, **Gold**, and **Silver** – each designed to provide a unique combination of opportunities to showcase your support for this important cause. These packages are limited, so act quickly to secure your preferred option.

PLATINUM PACKAGE €15,000	GOLD PACKAGE €10,000	SILVER PACKAGE €5,000
• **1x 20m Main Plenary Presentation**	X	X
• **3x 25m Mini Theatre Presentations** *(to different audiences)*	• **2x 25m Mini Theatre Presentations** *(to different audiences)*	• **1x 25m Mini Theatre Presentation**
• **3x 15m Tech Showcase Presentations** *(to different audiences)*	• **2x 15m Tech Showcase Presentations** *(to different audiences)*	• **1x 15m Tech Showcase Presentation**
• **49" Touchscreen Tech Showcase Pod**	• **43" Touchscreen Tech Showcase Pod**	• **32" Touchscreen Tech Showcase Pod**
• **10 Free Delegate Tickets** and **20 Half-Price Delegate Tickets** for staff/invitees	• **7 Free Delegate Tickets** and **14 Half-Price Delegate Tickets** for staff/invitees	• **5 Free Delegate Tickets** and **10 Half-Price Delegate Tickets** for staff/invitees
• **2 Social Event** 'Sports or Entertainment' Booths	• **1 Social Event** 'Sports or Entertainment' Booth	X
• **Full Page 43" Display Advert** on the 6x Summit Information Screens	• **Quarter Page Display Advert** *(alongside 3 others)* on the 6x Summit Info Screens	• **Logo on a Shared Display Advert** on the 6x Summit Information Screens
• **Space for a Branded Pull-Up** 80cm Banner on **Atrium Wall 1** *(Client supplied banner)*	• **Space for a Branded Pull-Up** 80cm Banner on **Atrium Wall 2** *(Client supplied banner)*	X
• **30m** with the Event **Videographer** to record material and professionally edited clips	• **20m with the Event Videographer** to record material and professionally edited clips	• **10m with the Event Videographer** to record material and professionally edited clips
• **Full Page Editorial** in the Summit Compendium	• **Half Page Editorial** in the Summit Compendium	• **Quarter Page Editorial** in the Summit Compendium
• **Premium Sponsorship Listing** on the Event Registration and Venue Pages	• **Secondary Sponsorship Listing** on the Event Registration and Venue Pages	• **Logo Placement** on the Event Registration Page
• **Large Online Expo Booth** on Ring Central	• **Medium Online Expo Booth** on Ring Central	• **Small Online Expo Booth** on Ring Central

Tailored Sponsorship

If our Premium Sponsorship Packages don't meet your needs, you can explore individual opportunities featured in this section. Many components from the packages are available to book separately, providing the flexibility to tailor your sponsorship to your specific goals and audience.

DON'T MISS OUR EARLY BIRD OFFERS

20m - Main Plenary Presentation

A Main Plenary Stage presentation provides exceptional exposure to a global audience, positioning your brand as a leader in online safety. *All presentations will be featured on the event's YouTube channel, extending your reach beyond the summit.*

UP TO 8 SLOTS AVAILABLE

€5,000 EACH

25m - Mini Theatre Presentation

A Mini Theatre presentation offers the chance to engage a focused audience, showcasing your expertise and solutions in a targeted setting. *All presentations will be featured on the event's YouTube channel, extending your reach beyond the summit.*

UP TO 144 SLOTS AVAILABLE

€2,000 EACH

15m - Showcase Presentation

A Showcase presentation allows you to highlight your solutions in a dedicated room with high footfall, ensuring maximum exposure and engagement with a diverse audience. *All presentations will be featured on the event's YouTube channel, extending your reach beyond the summit.*

UP TO 84 SLOTS AVAILABLE

€1,500 EACH

49" Touchscreen Tech Showcase Pod

Interactive TV Screen Podium tech pod running your interactive presentation throughout the event.

6 PODS AVAILABLE

€4,000 EACH

43" Touchscreen Tech Showcase Pod

Interactive TV Screen Podium tech pod running your interactive presentation throughout the event.

6 PODS AVAILABLE

€3,000 EACH

32" Touchscreen Tech Showcase Pod

Interactive TV Screen Podium tech pod running your interactive presentation throughout the event.

12 PODS AVAILABLE

€2,000 EACH

21.5" Touchscreen Tech Showcase Pod

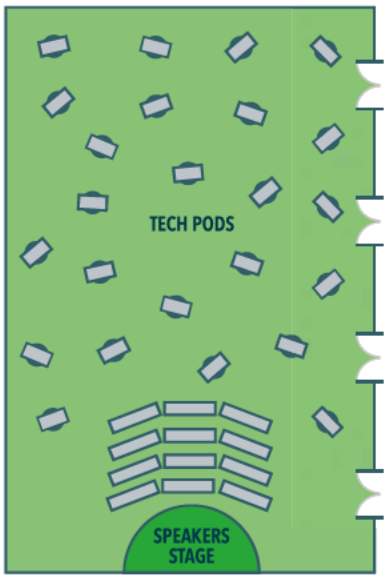
Interactive TV Screen Podium tech pod running your interactive presentation throughout the event.

12 PODS AVAILABLE

€1,000 EACH

49" TOUCHSCREEN POD

TECH SHOWCASE



* We offer **50%** discount for bookings before 31st Jan 2025

* We offer **25%** discount for bookings before 28th Feb 2025

DON'T MISS OUR EARLY BIRD OFFERS

> "This has been an incredible week and you get to meet so many passionate people who've got this desire to really want to help protect children and keep them safe. It's been brilliant."

Jo Morton-Brown
Founder
Flourish

Full Page 43" Display Advert On 6x Event Information Screen

Showcase your Ad on the event information screens in the Networking Atrium, ensuring high visibility and wide exposure to all attendees throughout the summit.

4 ADVERTS AVAILABLE

€2,000 EACH

30m with Professional event Videographer

30 minutes with the Event Videographer to record content and receive professionally edited clips, perfect for promotional use on your digital platforms during and after the event.

12 SPACES AVAILABLE

€2,000 EACH

Premium Sponsorship On-line Listings

Premium Sponsorship Listing on the Event Registration and Venue Pages, providing your brand with exposure to all virtual and in-person participants.

LISTING	COST
Large Online Expo Booth	€2,000 EACH
Medium Online Expo Booth	€1,500 EACH
Small Online Expo Booth	€1,000 EACH

SPACES UNLIMITED

Evening Events

Wednesday 9th April - An Evening of Activity

The **All Out Amsterdam**, the city's number one activity bar, offers a dynamic social hub with interactive games like **Karaoke, Darts, Sojelen** and **Shuffleboard**, paired with vibrant food and drink options. It's the perfect venue for brands looking to sponsor engaging and memorable events.

Venue: www.theallout.com

DON'T MISS OUR EARLY BIRD OFFERS

Karaoke Booths - 1hr Slots

Sponsoring a karaoke private booth is a unique way to connect with a vibrant and engaged audience. Your brand will be featured prominently in a lively, high-energy setting.

5 SLOTS AVAILABLE

€1,000 EACH

THE ALL OUT

Dart Booths - 1hr Slots

Sponsoring a private dart booth offers a unique way to showcase your brand in a lively, interactive setting, engaging a dynamic and competitive audience.

5 SLOTS AVAILABLE

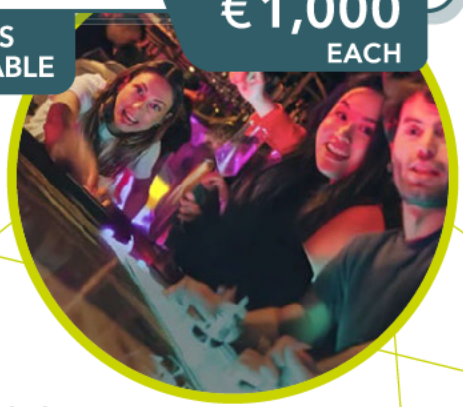
€1,000 EACH

Shuffleboard - 1hr Slots

Sponsoring a shuffleboard booth highlights your brand in a vibrant, open setting, engaging guests as they enjoy this interactive and social activity.

5 SLOTS AVAILABLE

€1,000 EACH



Sjoelen Booths - 1hr Slots

Sponsoring a Sjoelen booth showcases your brand in a lively, open space, connecting with guests as they enjoy this fun and engaging Dutch game.

5 SLOTS AVAILABLE

€1,000 EACH

© Age Check Certification Scheme

2025 Summit Compendium

The Summit Compendium is a valuable resource featuring all event speakers, with links to their presentations and talks on our YouTube channel. Distributed to both digital and in-person participants after the event, this comprehensive document ensures ongoing engagement and reference. By showcasing your brand within the compendium, you'll leave a lasting impression, reinforcing your presence long after the event concludes.

DON'T MISS OUR EARLY BIRD OFFERS

*Advertising space is limited to ensure your brand stands out–secure your spot **NOW** to avoid disappointment!*

Compendium **FULL Page** Editorial

Maximize your brand's impact with a full-page ad in the compendium, offering prime visibility to all attendees and ensuring your message stands out in this essential post-event resource.

3 ADS AVAILABLE

€5,000 EACH

Compendium **HALF Page** Editorial

Gain significant exposure with a half-page ad in the compendium, perfectly balancing cost and reach.

6 ADS AVAILABLE

€2,500 EACH

Compendium **QUARTER Page** Editorial

Secure a cost-effective way to highlight your brand with a quarter-page ad in the widely distributed compendium.

8 ADS AVAILABLE

€1,125 EACH

2024 Compendium document.

© Age Check Certification Scheme

Getting In Touch

Our **Senior Busienss Development Manager**, ***Obi Udanoh*** is happy to help you bring your brand to the forefront of this ground breaking event.

*** We offer 50% discount for bookings before 31st Jan 2025**

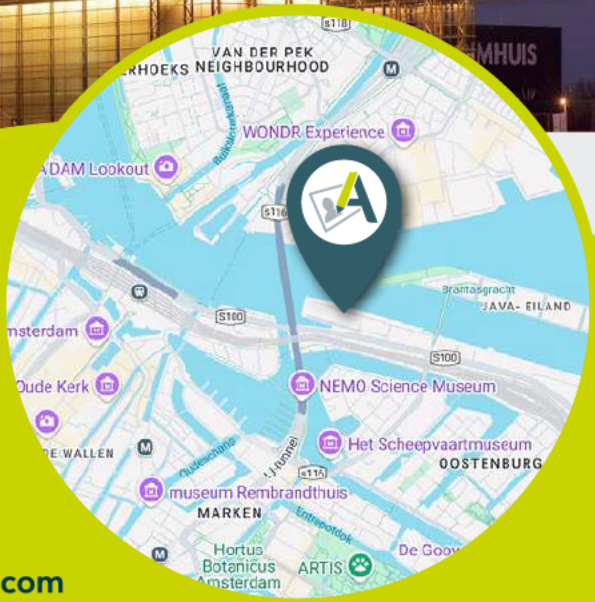
*** We offer 25% discount for bookings before 28th Feb 2025**

We already have expressions of interest from various participants all over the world.

Last year,we had **53 countries represented** and more than **700 delegates remote – with over 200 in person**.

See the following 2 pages for 2024 Manchester event stats.

**All of the packages in this brochure must be booked and paid for before the deadline.*
Prices are + BTW (Dutch VAT at 21%)



Mövenpick Hotel
Piet Heinkade 11
1019 BR
AMSTERDAM
Netherlands

Get in touch
gaass@accscheme.com

Global Summit Manchester 2024 Statistics

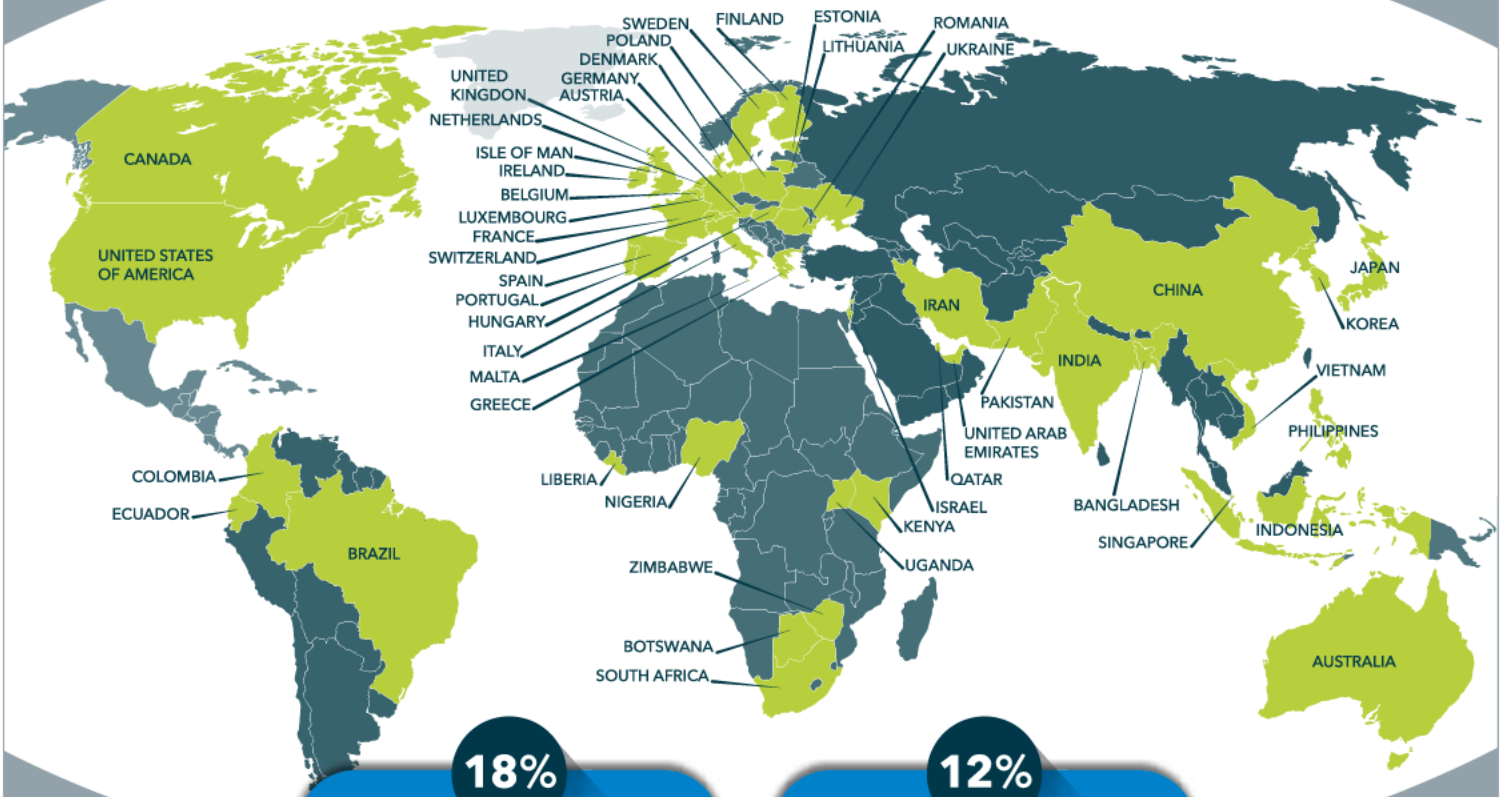
102 Expert speakers

709 Registered delegates

212 Attended in person

424 Attended online

Delegates from **53** countries



18%

of Attendees were C-Suite

having the title 'Chief' 'Founder,' 'Director' or 'President'

12%

of delegates were from Governments or Regulators

Global Summit 2024 Statistics Continued

119 delegates from **age assurance service providers**

74 delegates from **ISO/ IEC JTC 1/SC 27/WG 5 working groups**

37 delegates from **'relying parties'** or **'age assurance service users'**

14 of the **Top 20 global online platforms** had representatives attending

Over 9h

is the average time spent by attendees online at the event

Over 77h

of videos of sessions, panels and debates

Peak online audience of 124 for the keynote address from Marija at SafeOnline

94%

of all attendees said they would recommend the event

★ ★ ★ ★ ★

227 Sessions over **5 days**

22 Video Interviews of Delegates

Organiser's Digital files **1,921** over **341** folders

Visit us on social media...

@AgeCheckCert

Internationally recognised standards

Our scheme provides evidence that identity and age check practices meet international standards.

Highly qualified certification officers

Our locally trained certification officers are highly qualified professionals in each jurisdiction.

Evidence you can use to demonstrate compliance

Our certificates of conformity are internationally recognised by law enforcement.

Guaranteed independence & impartiality

Our independent board, impartiality committee and ISO processes guarantee impartial certification.

Age Check Certification Scheme

www.accscheme.com

Unit 321, Broadstone Mill,
Broadstone Rd, Reddish,
Stockport, SK5 7DL, United Kingdom

gaass@accscheme.com

+44 (0) 1614 434111

From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 13 January 2025 11:02 AM
To: Julie Inman Grant
Cc: s 22 s 47E(d) ; s 22
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Thanks Julie,

We have also received s 47F comments back this morning so we will take all of these together and work on further enhancing the report.

Enjoy your annual leave.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: Sunday, January 12, 2025 10:11 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

OFFICIAL

Dear Tony

The broader eSafety team has now had the chance to review the Evaluation Proposal and provide some comments and proposed edits. Thanks again for the opportunity to do so.

By way of brief overview:

- The team has added comments providing references to specific sections of the AV Roadmap Background Report and Phase 2 Codes Position Paper, which provide some language as requested re the intersections between the Social Media Act and other components of the OSA, as well as types of class 1 material.
- This is noted in a comment in the paper relating to the Ethics Committee but for easy reference, the relevant point of contact from the OAIC is s 22 @oaic.gov.au).
- We would be happy to set up a meeting to brief s 47F on the Phase 2 Codes and can provide a summary of all the age assurance related measures in the current iteration of the draft codes once the MOU has been finalised. s 22 can assist with scheduling.

The team is happy to set up a time to discuss further if you have any follow up questions before publication at the end of the month. For your visibility, I am on leave this week, but s 22 (copied) will be acting Commissioner in my absence and can action any further queries.

All the best,
Julie

Julie Inman Grant
Commissioner
s 22

Executive Assistant: s 22 @esafety.gov.au

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: s 22
Sent: Friday, 24 January 2025 2:48 PM
To: s 47F @monash.edu; Tony Allen
Subject: Advisory Board Meeting [SEC=OFFICIAL]
Attachments: [EMBARGOED] D-2.9 Evaluation Proposal Report.pdf

OFFICIAL

Hi s 47 and Tony

Julie is planning to attend the first Advisory Board meeting next Wednesday.

She was planning to attend only but just wanted to check if she would be required to make any interventions?

Thank you so much
Kind regards
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: s 47F @monash.edu>
Sent: Monday, 20 January 2025 11:23 AM
Subject: Evaluation Proposal for the Age Assurance Technology Trial

You don't often get email from s 47F @monash.edu. Learn why this is important

Greetings and a very happy new year to all of you.

Tony and the team have provided a **strictly embargoed** copy of the *Evaluation Proposal for the Age Assurance Technology Trial*. The attached document is released to you in advance of the Advisory Board meeting on 29 January for your feedback and comments.

Tony has advised that this document has already been subject to review and approval by:

- The Department for Infrastructure, Transport, Regional Development, Communications and the Arts
- The eSafety Commissioner
- The Office of the Australian Information Commissioner
- The Age Check Certification Scheme

Also note that the document has been subject to independent validation by s 47F , Chief Scientist, Laureate Fellow & Scientia Professor of AI
at the University of New South Wales.

The document is the latest milestone in the Age Assurance Technology Trial and the team intend to publish a final version on 6th February 2025. In the interim they welcome editorial, technical or requests for greater explanatory information from members of this Board. Please ensure this is completed by 16:00 AEDT on Monday 3rd February 2025.

Also, s 47F will circulate a final draft of the terms of reference for your review shortly.

Best Regards

s 47F

Professor s 47F

Department of Data Science and Artificial Intelligence,
Faculty of Information Technology
Monash University
Victoria 3800, Australia

Subject: Age Assurance Trial - Stakeholder Advisory Board
Location: Microsoft Teams Meeting

Start: Wed 29/01/2025 9:00 AM
End: Wed 29/01/2025 10:30 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: s 47F - Age Verification Providers Association

Categories: External meeting

Some people who received this message don't often get email from s @avpassociation.com. Learn why this is important

The second meeting of the Stakeholder Advisory Board will take place online on the morning of 29th January. We hope you can participate, but there will be a recording of the meeting if you are unable to attend at that time.

We will review the expressions of interest we will have received from potential participants offering their methods for review in the trial; hear an update on ethics; and learn more from the technical team on their approach to testing and evaluation.

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 393 696 014 349

Passcode: rw2wC2eY

For organizers: Meeting options

Meetings may be recorded for internal use and/or minuted using AI tools

---

From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 3 February 2025 10:31 AM
To: Julie Inman Grant
Cc: s 22 ; Office of Regulatory Operations; s 22
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]
Attachments: D-2.9 Evaluation Proposal Report [FINAL].pdf

Hi Julie,

Thank you for all of your comments and suggestions for the Evaluation Proposal Report. You will now find attached the approved version which has gone to print and that we plan to publish on Thursday 6th February.

I'm looking forward to meeting with some of the team there again later today.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 18 January 2025 2:37 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 n@eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; ffice of Regulatory Operations s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Thanks Tony for being so consultative - all in between Supreme Court visits in the brutal cold! I'll revert back when I'm in the office on Monday and look forward to seeing you on your upcoming trip to Australia. Julie

Get Outlook for iOS

From: Tony Allen s 47F @accscheme.com>
Sent: Saturday, January 18, 2025 11:57:18 AM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; Office of Regulatory Operations s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Dear Julie,

Thank you to you and the team for your very valuable input to the Evaluation Proposal for the Age Assurance Technology Trial.

I am pleased to be able to share a revised proposal document and, for your ease, a tracked changes version of the document too.

The attached document has also been reviewed and input provided from colleagues at the Department for Infrastructure and the Office of the Australian Information Commissioner. In addition, we have taken into account comments from s 47F at the University of New South Wales as a part of his independent validation process.

We have now released an embargoed copy of the report to s 47F Chair of the Stakeholder Advisory Board, for him to circulate to the Board and invite comments and discussion at their meeting on 29th January. We have advised him that we would welcome any editorial, technical or requests for greater explanatory information type comments from the Stakeholder Advisory Board. We do not intend, at this stage, to make any further changes that would affect the underlying independent validation of the approach to the Trial.

It remains our intention to publish the final version of this document on 6th February.

Thank you again for all of your input and support with this project.

Best Regards

Tony

From: Julie Inman Grant
Sent: Sunday, January 12, 2025 10:11 PM
To: Tony Allen
Cc: s 22 ; s 47E(d) ; s 22
Subject: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

OFFICIAL

Dear Tony

The broader eSafety team has now had the chance to review the Evaluation Proposal and provide some comments and proposed edits. Thanks again for the opportunity to do so.

By way of brief overview:

- The team has added comments providing references to specific sections of the AV Roadmap Background Report and Phase 2 Codes Position Paper, which provide some language as requested re the intersections between the Social Media Act and other components of the OSA, as well as types of class 1 material.
- This is noted in a comment in the paper relating to the Ethics Committee but for easy reference, the relevant point of contact from the OAIC is s 22 @oaic.gov.au).
- We would be happy to set up a meeting to brief s 47F on the Phase 2 Codes and can provide a summary of all the age assurance related measures in the current iteration of the draft codes once the MOU has been finalised. s 22 can assist with scheduling.

The team is happy to set up a time to discuss further if you have any follow up questions before publication at the end of the month. For your visibility, I am on leave this week, but s 22 (copied) will be acting Commissioner in my absence and can action any further queries.

All the best,
Julie

Julie Inman Grant
Commissioner

s 22

Executive Assistant: s 22 @esafety.gov.au

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

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Document Sensitivity: Public

eSafety FOI 25143
Document 43 of 75

D-2.9 Evaluation Proposal

06/02/2025

Dr Asad Ali, Dr Koliya Wedanage, Adrian Ugray, George Billinge, Dr Mark Pedersen, Surya Ramessh

Work Package: **WP2 - Context, Design & Validation**
Task Reference: **T2.9 – Evaluation Proposal**

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

Revision	Date	Revision by	Short Description of Changes
0.1	25-11-2024	Asad Ali	Added Table of Contents for review
0.2	16-12-2024	Asad Ali	First draft for internal review
0.3	29-12-2024	Asad Ali	Second draft addressing all comments and including all sections except statistical design
0.4	02-01-2025	Project Team	Various revisions and additional material incorporated into the document from feedback from the project team
1.0	03-01-2025	Tony Allen	Major Version Created, comments resolved and ready for submission for external validation
1.1	17-01-2025	Asad Ali	Updated to address all comments from all external reviewers
1.2	31-01-2025	Asad Ali	Updated following Stakeholder Advisory Board review
2.0	31-01/2025	Tony Allen	Addition of Final Validation Statement from Prof. Toby Walsh and Approval to send for Print

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Validation Statement

The project plan (D-6.1) included a requirement that the project team submit the evaluation proposal for independent validation by Professor Toby Walsh of the University of New South Wales, this is his independent assessment.

The proposal does a very good job of scoping out a trial to evaluate the effectiveness of age assurance technologies in Australia. The proposal is especially strong with respect to: (1) the comprehensive evaluation criteria; (2) addressing evidence gaps; (3) explicit ethical principles; (4) a standards-based approach; (5) a commitment to open scientific reporting; (6) and recognition of children's rights.

I identified a few minor issues in the initial draft where I recommended some attention such as addressing combinations of age assurance methods, sample sizes for minority groups, and child friendly project outputs (given this group will be directly impacted by age assurance).
All these issues have been adequately addressed in the final evaluation proposal.

In summary, the trial has been scoped out well and looks set to deliver high quality results on the capabilities of age assurance technologies. I commend the work that the team has put in so far.

Professor Toby Walsh
Scientia Professor of Artificial Intelligence at the University of New South Wales
FAA FAAAI FAAAS FACM FEurAI FRSN

Toby Walsh is Scientia Professor of Artificial Intelligence at the University of New South Wales in Sydney and CSIRO's Data61. He is the winner of the prestigious Celestino Eureka Prize for Promoting Understanding of Science and was named on the international "Who's Who in AI" list of influencers. He has given over 100 talks on the subject of AI to a wide range of audiences, from industry associations, conferences for the general public, corporate events, board meetings, policy meetings and many others.

As well as speaking at leading companies and stages globally like CeBIT, the World Knowledge Forum, World Summit AI and TEDx, Toby also appears regularly on TV and radio, has been profiled by the New York Times and has authored four books on AI for a general audience, the most recent ones entitled "Machines Behaving Badly" and "Faking It: Artificial Intelligence in a Human World" (Fall 2023). He is a Fellow of the Australia Academy of Science and was named by the newspaper The Australian as one of the "rock stars" of Australia's digital revolution. He has won both the Humboldt Prize and the NSW Premier's Prize for Excellence in Engineering and ICT. His Twitter account was voted in the top ten to follow to keep abreast of developments in AI.

1. Introduction

The purpose of this Age Assurance Technology Trial ("the trial"; "AATT") is to assess the effectiveness of a wide range of age assurance (AA), parental consent and parental control technologies available in the market, against a broad range of criteria including accuracy, interoperability, reliability, ease of use, minimisation of bias, protection of privacy and data security. The AATT will not design, implement or endorse any particular technology or policy position.

Digital age assurance technologies are increasingly being mandated by governments[1] and deployed in both online and offline contexts to keep people, particularly children, safe. Some of their uses include preventing users below a certain age from accessing harmful online content, providing children with age-appropriate online experiences or restricted children's access to goods like knives or alcohol.

Age assurance refers to various methods which are used to determine a person's age online, encompassing age verification, age estimation and age inference technologies[2]. These are defined as follows:

- Age verification relies on calculating the difference between a verified year or date of birth of an individual, typically from an identity document and a subsequent date (e.g. the date when the age check takes place).
- Age estimation analyses the biological or behavioural features of humans that vary with age, such as their face or voice.
- Age inference is based on verified information which indirectly implies that an individual is over or under a certain age or within an age range, for example holding a credit card implies that the holder is 18 years old or above in Australia.

Other child protections measures include parental consent and parental controls[3]:

- Parental Consent: Consent from a person holding parental authority over a child. Critical to this is the procedure to validate the authenticity of the parental consent. It also usually, but not always, contains the procedure to attest to the age of the child.
- Parental Control tools: These allow an adult responsible for a person under the age of 18 a degree of control over what content the child can access. Parental control systems can be applied at the network or device level or through linking accounts between the child and parent or caregiver.

[1] AV around the world – AVPA

[2] International Organisation for Standardization (ISO), "ISO Draft International Standard (DIS) 27566-1:2025 Age Assurance Systems- Part 1: Framework," 2025. Available https://www.iso.org/standard/88143.html

[3] S. Smirnova, S. Livingstone and M. Stoilova, "Understanding of user needs and problems: a rapid evidence review of age assurance and parental controls," 11 2021. Available: https://eprints.lse.ac.uk/112559/

The design, evaluation and implementation of age assurance and other child protection measures raise several ethical issues and so strong ethical principles must underpin any research in this area. The AATT will be delivered in line with a set of guiding ethical principles: respect, transparency, accountability, fairness, privacy and safeguarding children.[4] These principles will be operationalised through the delivery of several activities contained within Work Package 1: Data, Ethics and Impartiality. In addition, activities across all work packages will be subject to scrutiny from the project Ethics Committee and, where necessary, an independent impartiality panel.

This document is the culmination of Work Package 2 for the Trial. This covers understanding the specific context in use of age assurance technology in the Australian context, including online safety, privacy and digital identity legislation, the Australian Signals Directorate's Information Security Manual[5] and the specific programme requirements. It includes a literature review of research relevant to the evaluation of age assurance technologies from domestic and international sources.

This document covers the design and development of a standardised and replicable evaluation process using ISO/IEC 25040 – Systems and software quality requirements and evaluation[6]; applying the five core characteristics identified in ISO/IEC DIS 25766 – Age assurance systems – Part 1: Framework and the specific indicators identified in IEEE 2089.1 – Online age checking systems[7] and the Software Engineering test design methods in ISO/IEC 29119[8]. All these practices and standards are captured within the Age Check Certification Scheme's existing ISO 17065[9] accreditation.

1.1. Previous Studies

The trial is considering a potential evidence gap regarding how well age assurance, parental consent and parental controls systems work on their own and in combination. Various recent research studies have evaluated these systems theoretically[10] [11] or focused on gathering user perceptions of them[12] [13]. The National Institute of Standards and Technology (NIST) Face Age Technology Evaluation (FATE) Age Estimation testing[14] is a prominent example of independent and

[4] See A-1.1.1 Ethics Handbook.
[5] Information Security Manual (ISM) | Cyber.gov.au
[6] ISO/IEC 25040:2024 - Systems and software engineering — Systems and software Quality Requirements and Evaluation (SQuaRE) — Quality evaluation framework
[7] IEEE SA - IEEE 2089.1-2024
[8] ISO/IEC/IEEE 29119-1:2022 - Software and systems engineering — Software testing — Part 1: General concepts
[9] ISO/IEC 17065:2012 - Conformity assessment — Requirements for bodies certifying products, processes and services
[10] M. Sas and J. T. Mühlberg, "Trustworthy Age Assurance?," The Greens Cluster: Social & Economy. In The European Parliament., 2024.
[11] M. R. Shaffique and S. van der Hof, "Research report: Mapping age assurance typologies and requirements.," Directorate-General for Communications Networks, Content and Technology, Better Internet for Kids (BIK), European Commission, 2024.
[12] "Questions, doubts and hopes. Young people's attitudes towards age assurance and the age-based restriction of access to online pornography.," The eSafety Commissioner, 2023.
[13] "Public perceptions of age verification for limiting access to pornography.," The eSafety Commissioner, 2021.
[14] National Institute of Standards and Technology, "Face Analysis Technology Evaluation (FATE) Age Estimation & Verification", Available: https://pages.nist.gov/frvt/html/frvt_age_estimation.html

transparent technical testing in this space. It assesses the accuracy and potential bias of age estimation by analysing an image of a face (face age estimation). It also uses a fully automated testing approach in a laboratory environment, rather than real-world conditions. Furthermore, the test dataset used consists primarily of images from USA immigration visas, arrest mugshots, border crossings and immigration offices. These differ to images captured when users are browsing online services or physical locations like retail stores.

Another research study is Enex TestLab's assessment[15], which evaluates a range of age assurance systems both theoretically and technically. In this research, the technical evaluation focused on two age assurance systems, using their publicly available demos hosted online, with 14 participants.

Driven in part by the current evidence base and pilots conducted elsewhere, the Australian eSafety Commissioner's Roadmap for Age Verification[16] includes a key recommendation that age assurance technologies should be trialled in Australia. In the Australian Government's response[17], the roadmap's recommendation of conducting a pilot was noted. Following this, the government announced[18] that it would 'provide resourcing to conduct a pilot of age assurance technology to protect children from harmful content, like pornography and other age-restricted online services. This pilot is the AATT.

The UK's online safety and data protection regulators, Ofcom and the ICO, have conducted and published research to explore age assurance technologies and practices. Their work investigates how these methods verify user ages, assess their accuracy and effectiveness and ensure compliance with privacy standards. This research informs guidelines for responsible deployment, balancing safeguarding and user privacy. It aims to support organisations in implementing age assurance mechanisms that align with legal and ethical standards, particularly in digital and online environments. Their work includes:

- **Families' attitudes towards age assurance**: This research explores the perspectives of children and parents on age assurance methods, balancing considerations such as privacy, online safety and ease of use[19].
- **Measurement of Age Assurance Technologies**: A technical study providing insights into the accuracy levels achievable by different age assurance systems, prompting further reflection

[15] Enex TestLab, "Age Verification Technology Evaluation," Appendix 8, Appendices to the Background Report - AV Roadmap. The eSafety Commissioner, 2023.
[16] The eSafety Commissioner, "Roadmap for age verification and complementary measures to prevent and mitigate harms to children from online pornography," 2023.
[17] Australian Government, "Australian Government response to the Roadmap for Age Verification," August 2023. Available: https://www.infrastructure.gov.au/department/media/publications/australian-government-response-roadmap-age-verification
[18] Prime Minister of Australia, "Tackling Online Harms." Available: https://www.pm.gov.au/media/tackling-online-harms.
[19] https://www.gov.uk/government/publications/families-attitudes-towards-age-assurance-research-commissioned-by-the-ico-and-ofcom

on measuring their overall effectiveness. This work was carried out by the Age Check Certification Scheme team[20].

- **How online businesses are using age assurance**: This study examines how organizations implement age assurance measures, the drivers and challenges they face and their future plans in this area[21].

The European Commission is advancing age assurance through the **Better Internet for Kids+ (BIK+) strategy**[22], which aims to create a safer digital environment for children, promoting age-appropriate content and experiences. Complementing this, standardization efforts, including work by the European Telecommunications Standards Institute (ETSI), focus on developing technical guidelines to harmonize age verification practices across Europe[23]. These initiatives seek to balance robust protection for minors with user privacy and accessibility standards in online services.

1.2. Problem statements

The AATT sets out to address three key problems:

1. Overreliance on theoretical evaluation: most age assurance assessments rely on theoretical evaluation, lacking insight into their quantitative performance in real-world and test laboratory environments.
2. Lack of comprehensive technical evaluation: existing technical assessments have focused on a limited set of age assurance systems. Therefore, there is a lack of evidence for the effectiveness of the broader range of systems available in the market.
3. Underrepresentation of Australian subpopulations in studies: existing studies performing technical assessments often fail to incorporate statistically significant sample sizes that represent the diverse subpopulations within Australia, including Aboriginal and Torres Strait Islander peoples as well as multi-ethnic diverse communities. This limits applicability and relevance to the Australian context.

A structured approach to the research and analysis of existing age assurance and other child protection technologies, taking the above problem statements into account, will support policy makers in developing evidence-based approaches to reducing online harms.

1.3. Aim

The Department of Infrastructure, Transport, Regional Development, Communications and the Arts has commissioned this study. In the original tender, the Department set requirements to:

[20] https://www.drcf.org.uk/publications/papers/measurement-of-age-assurance-technologies
[21] https://ico.org.uk/media/about-the-ico/documents/4030926/20240704-ico-age-assurance-report.pdf
[22] https://digital-strategy.ec.europa.eu/en/policies/strategy-better-internet-kids
[23] https://www.etsi.org/committee/1400-hf

a) evaluate the maturity, effectiveness and readiness for use of available age assurance technologies that determine whether a user is 18 years of age or over, to permit the user to access age-restricted online content; and
b) evaluate the maturity, effectiveness and readiness for use of available age assurance technologies that determine the age of a user in the 13-16 years age band, to permit the user to create an account on a social media website or application.

We recognise that since the award of this tender, the Australian Parliament[24] has passed the Online Safety Amendment (Social Media Minimum Age) Act 2024. As a result of this change, which sets an age limit of 16 for social media platforms, the trial will include consideration of age assurance technologies that determine whether a user is 16 years of age or over.

The evaluation will focus on criteria including, but not limited to:

- Accuracy (how well the technology can detect a user's age)
- Interoperability (how well the technology can be used across multiple online platforms)
- Reliability (how consistently the technology can produce the same result)
- Ease of use (how simple the technology is to operate)
- Minimisation of bias (how well the technology avoids racial or other bias)
- Protection of privacy (how well the technology protects users' personal information, including data minimisation techniques)
- Data security (how well the technology safeguards users' personal information from unauthorised access, breaches or theft through, for example, the use of security by design principles and resistance to presentation attacks)
- Human rights protections (i.e. accessibility for all users, including people with disability, as well as applicable rights under the UN Convention on the Rights of the Child)

The evaluation will consider each age assurance technology in the context of broader requirements and guidance applied in Australia, including:

- eSafety: Safety by Design principles[25]
- Department of Industry, Science and Resources: Voluntary AI Safety Standard[26]
- Information Security Registered Assessors Program (IRAP) assessment[27]

The evaluation is not an assessment of conformity against these, but will note if any of the proposed technologies are likely to be generally incompatible with the underlying principles of such guidance.

[24] Online Safety Amendment (Social Media Minimum Age) Bill 2024 – Parliament of Australia
[25] https://www.esafety.gov.au/industry/safety-by-design
[26] https://www.industry.gov.au/publications/voluntary-ai-safety-standard
[27] https://www.cyber.gov.au/irap

1.4. Out-of-Scope

The Age Assurance Technology Trial is **not** designed to develop new technologies or tools for age assurance. Instead, it focuses on assessing existing systems and their practical applications. It is **not** creating a comparative league table of technologies to rank their performance, nor is it focused on approving or certifying specific technologies for compliance or endorsement. The trial does not aim to prescribe specific methods or mandate their use in regulatory frameworks.

Furthermore, the trial is **not** setting industry standards or defining universal benchmarks for age assurance performance. It does not evaluate the commercial viability of these systems, assess their business models or provide a comprehensive policy recommendation for deployment, although the outcome of the trial may assist policy makers, such as the eSafety Commissioner for Australia, to make evidence-based, informed policy decisions.

The trial's goal is to gather structured, scientific and impartial evidence on the effectiveness, usability and limitations of current technologies. This is to inform future research, development, policy, guidance and guidelines as to how the technologies could effectively work in practice to help Australia achieve its policy and online safety objectives.

2. Literature Review

2.1. Age restrictions in Australia

To define the age restrictions in-scope of the study, it is critical to understand the major age restrictions already in place across Australia, in both online and offline contexts. Age restrictions for various products and services are set out below.

2.1.1 Knives and Controlled Items

In the retail sector, knives and other controlled items are restricted from sale to individuals below a certain age[28]. This varies across states as follows:

State/Territory	Minimum Age for the purchase of Knives and Controlled Items
New South Wales (NSW)	16
Western Australia (WA)	18
South Australia (SA)	16
Victoria (VIC)	18
Australia Capital Territory (ACT)	16
Queensland	18
Northern Territory	No specific legislation applies
Tasmania	No specific legislation applies

2.1.2 Smoking

Across all of Australia, it is illegal to sell or supply tobacco products to people under the age of 18[29]. In some states, the police can confiscate cigarettes or other tobacco products found in the possession of those under 18 years old.

2.1.3 Vaping

Vapes and vaping products, which may or may not contain nicotine, can only be sold by pharmacies to support people quit smoking or managing nicotine dependence[30]. The Public Health (Tobacco and Other Products) Act 2023 was passed to facilitate this on 1st July 2024[31].

[28] National Retail Association, "National Sale of Knife Laws | Comparison Table", Available: https://www.nationalretail.org.au/app/uploads/2024/06/National-Knife-Laws-Comparison-Table-v2.pdf
[29] Department of Health and Aged Care, Australian Government., "Smoking and tobacco laws in Australia", Available: https://www.health.gov.au/topics/smoking-vaping-and-tobacco/about-smoking/laws-in-australia
[30] Department of Health and Aged Care, Australian Government, "New laws for vapes", Available: https://www.health.gov.au/vaping/new-laws
[31] Australian Government, "Public Health (Tobacco and Other Products) Act 2023", Available: https://www.legislation.gov.au/C2023A00118/latest/text

Since 1st October 2024, the minimum age to purchase vapes from participating pharmacies with a nicotine concentration of 20 mg/mL or less without a prescription is 18, where state and territory laws allow.

People under 18 years of age can access vapes but only with a prescription, where state and territory laws allow, to ensure they get appropriate medical advice and supervision.

2.1.4 Alcohol

The minimum legal age for the purchase or consumption of alcohol in a licensed venue or from a retail shop is 18[32].

In some states and territories, it is legal to supply alcohol if you have approval from a child's parent or guardian. In others, it is only legal if you are the parent or guardian.

In all states and territories, it is illegal to supply people under 18 with alcohol if responsible supervision is not provided[33].

Responsible supervision refers to:

- if the adult supplying the alcohol is intoxicated
- if the young person is intoxicated
- the age of the young person
- the type and amount of alcohol supplied and over what period of time
- if the young person has eaten food with the alcohol
- how the young person is supervised by the adult supplying the alcohol[34] [35] [36] [37] [38] [39].

The laws across different states and territories are as follows:

- In the ACT, NSW, SA, TAS, VIC and WA alcohol can be provided to minors in a private home **if**:
    - provided by the parent/guardian or with permission of the parent/guardian
    - provided with responsible supervision.[40]
- In the NT and QLD alcohol can be provided to minors in a private home if:
    - provided by the parent/guardian, step-parent or adult who has parental rights and responsibilities

[32] Department of Health and Aged Care, Australian Government, "Alcohol Laws in Australia", Available: https://www.health.gov.au/topics/alcohol/about-alcohol/alcohol-laws-in-australia
[33] Alcohol and Drug Foundation, "Providing alcohol to under 18s", https://adf.org.au/insights/understanding-secondary-supply/
[34] State of Queensland. Supplying alcohol to under 18s 2022
[35] Government of New South Wales. Alcohol and Young People
[36] Attorney-General's Department. Information for parents of minors 2023
[37] Department of Police Fire and Emergency Management. Youth and Alcohol 2022
[38] State Government of Victoria. Minors and alcohol 2023
[39] Alcohol Think Again. Alcohol laws for under 18s 2022
[40] ACT Policing, "Alcohol – Supply of alcohol to minors", https://police.act.gov.au/community-safety/alcohol-and-drugs/alcohol

- provided with responsible supervision[41].

2.1.5 Gambling

The minimum legal age for gambling is 18 years. There is no single law that sets this universally across Australia, instead this is governed by a combination of federal, state and territory laws. For example, in Victoria, Section 10.7.3 of the Gambling Regulation Act 2003 states that "A gambling provider must not allow a minor to gamble"[42]. This fixed legal age applies to lottery ticket purchasing, sports betting and race betting, bingo, casino games, poker and all real money betting. Sports betting is the only form of online gambling legally permitted to be offered to Australian residents from domestically based sites[43].

2.1.6 Films (including Adult Films) and Computer Games

The Guidelines for the Classification of Film 2012 legislation[44] and the Australian Classification Board (ACB)[45] define the follows advisory ratings and associated age restrictions:

Rating Type	Rating	Description	Age Restriction
Advisory	General (G)	The content is very mild in impact	None
Advisory	Parental Guidance (PG)	The content is mild in impact	Not recommended for viewing by children under the age of 15 without guidance of a parent or guardian.
Advisory	Mature (M)	The content is moderate in impact	Not recommended for children under the age of 15. But they may legally access this content
Legally Restricted	Mature Accompanied (15+)	The content is strong in impact	Minimum age of 15. But a parent or adult guardian must purchase a ticket and accompany a person under 15 for the duration of the film at a cinema or be with them to purchase a MA 15+ film or game
Legally Restricted	Restricted (R 18+)	The content is high in impact	Minimum age of 18 years old
Legally Restricted	Restricted (X 18+)	Adult films containing sexually explicit activity	Minimum age of 18 years old

[41] Northern Territory Government. Young people, alcohol and drugs 2016
[42] Victoria State Government, "Gambling Regulation Act 2003", Available: https://www.legislation.vic.gov.au/in-force/acts/gambling-regulation-act-2003/107
[43] Gamblinglaws.org, "Gambling Laws in Australia 2024", Available: https://www.gamblinglaws.org/au/
[44] Australian Government, "Guidelines for the Classification of Films 2012", Available: https://www.legislation.gov.au/F2012L02541/asmade/text
[45] Australian Classification Board, "What are the ratings?", Available: https://www.classification.gov.au/classification-ratings/what-are-ratings

Legally Restricted	Refused Classification	Contains content that is outside generally accepted community standards and exceeds what can be included in the R 18+ and X 18+ ratings.	Cannot be sold, hired, advertised or legally imported in Australia

2.1.7 Online Safety

Services in scope of the Online Safety Act 2021[46] include search, social media, app distribution, hosting, internet carriage and providers of equipment and operating systems.

The Act defines two classes of material (in the form of text, data, speech, music, other sounds, visual images moving or otherwise, any other form or a combination of forms):

- Class 1 material that is classified or is likely to be classified, as 'RC' under the National Classification Scheme
- Class 2 material that is classified or is likely to be classified, as either X 18+ or R 18+ under the National Classification Scheme.

The Act requires the development of separate industry codes targeting class 1 and class 2 material. Industry codes for specific sectors, addressing class 1 material, include measures related to age restrictions. For example, Compliance Measure 6(c) in Schedule 1 – Social Media Services Online Safety Codes (Class 1A and Class 1B material)[47] requires Tier 1 and Tier 2 social media services to, at a minimum, "take reasonable steps to prevent an Australian child that is known to be under the minimum age permitted on the service from holding an account on the service…". Further, it suggests the implementation of age estimation technology to determine a user's age as an example of a reasonable step.

The draft Phase 2 codes[48] published in October 2024 set out a non-exhaustive list of examples of age assurance measures that will be considered appropriate, which include:

- matching of photo identification;
- facial age estimation;
- credit card checks;
- digital identity wallets or systems;
- attestation by a parent or guardian of age or whether an Australian end-user is a child;

[46] Australian Government, "Online Safety Act 2021", Available: https://www.legislation.gov.au/C2021A00076/latest/text

[47] The eSafety Commissioner, "Schedule 1 – Social Media Services Online Safety Code (Class 1A and Class 1B Material)", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-06/Schedule-1%E2%80%93Social-Media-Services-Online-Safety-Code-%28Class-1A-and-Class-1B-Material%29.pdf?v=1733862184332.

[48] The eSafety Commissioner, "Draft Phase Two Codes - Consolidated Industry Codes of Practice for the Online Industry (Class 1C and 2 Material)", October 2024, Available: https://onlinesafety.org.au/phase-two-codes/

- other measures meeting the requirements of section 8 (Confirmation of age) of the Online Safety (Restricted Access Systems) Declaration 2022; and
- relying upon appropriate age assurance measures implemented in respect of the relevant end-user by: (1) another party (whether another industry participant, a third party vendor or another third party) and

A Restricted Access System is an access-control system that meets the requirements under the Online Safety (Restricted Access Systems) Declaration 2022 (Cth) (RAS Declaration). This sets out the minimum requirements for access-control systems used by social media services, relevant electronic services and designated internet services provided from Australia[49]. Its primary aim is to restrict children's access to R18+ content (i.e. a subset of class 2 material) online, upon receiving a notice from eSafety.

Rather than mandating specific technologies or processes, the RAS Declaration states that an access-control system must:

- require an application be made by a person to access the relevant material, declaring they are at least 18
- incorporate reasonable steps to confirm an applicant is at least 18
- give warnings about the nature of the material and safety information about how a parent or guardian may control access to the material
- limit access to the material unless certain steps are followed

The development of industry codes addressing class 2 material began on 1 July 2024[50] and consultation on draft codes finished in late November 2024. The eSafety Commissioner has not endorsed the draft codes and will undertake an assessment of whether submitted codes meet the statutory requirements after industry submits the codes for registration by February 28, 2025.

The eSafety Commissioner's Roadmap for Age Verification includes a recommendation that if a service allows pornography, "it should apply settings to prevent it from being accessed by and recommended to children. Among other things, this requires robust age assurance measures"[51]. The phase 2 codes position paper[52] provides further, more robust guidance on where and how the eSafety Commissioner expects to see age assurance deployed to reduce the risk of children's access to pornography. These include providing protections across every level of the technology stack, such as age assurance measures, filters, parental controls, safety settings and others. Another

[49] The eSafety Commissioner, "Development of Phase 2 Industry Codes under the Online Safety Act – eSafety position paper", July 2024, Available: https://www.esafety.gov.au/sites/default/files/2024-07/Development-of-Phase-2-Industry-Codes-under-the-Online-Safety-Act-eSafety-position-paper_0.pdf

[50] The eSafety Commissioner, "Industry codes and standards," Available: https://www.esafety.gov.au/industry/codes

[51] The eSafety Commissioner, "Roadmap for age verification and complementary measures to prevent and mitigate harms to children from online pornography", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Roadmap-for-age-verification_2.pdf

[52] The eSafety Commissioner, "Development of Phase 2 Industry Codes under the Online Safety Act – eSafety position paper", July 2024, Available: https://www.esafety.gov.au/sites/default/files/2024-07/Development-of-Phase-2-Industry-Codes-under-the-Online-Safety-Act-eSafety-position-paper_0.pdf

element of this guidance is leveraging digital ecosystems for privacy-protecting, dataminimising age assurance and complementary safety measures. eSafety believes that existing internet ecosystems can effectively leverage existing enduser information gathering processes for privacy-protecting, data-minimising age assurance and complementary safety measures. The last element is building on pre-existing regulatory schemes which aim to protect and prevent children from accessing class 2 material. These schemes include the Restricted Access Systems (RAS) declaration, the Basic Online Safety Expectations (BOSE) determination, the Phase 1 Codes, and the Phase 1 Standards.

A minimum age of 13 years old is common for accessing several social media services, including BeReal[53], BlueSky[54], Discord[55], GoodReads[56] and Pinterest[57]. This age limit is specified in their terms of use, but it is currently rarely enforced by any means other than self-declaration. Until recently, this also applied to the most popular social media services in Australia. However, the parliament has passed new legislation in November 2024, known as the Online Safety Amendment (Social Media Minimum Age) Act 2024[58]. This defines 'age-restricted social media platforms' which will have an age limit of 16 and are to including SnapChat, TikTok, Instagram and X, among others. The new laws will come into effect no later than 12 months from passage of the bill.

2.2. Consumer Attitudes

Considering that user journeys will be impacted by the deployment of age assurance technologies, a key focus in the literature is on consumer attitudes of the technology. Prominent studies of consumers in Australia and the UK are described below.

Boichak, Humphry and Hutchinson[59] studied Australian teenagers aged 12-17 and their parents, using focus groups, co-design workshops and a national survey of 1200 participants conducted between 2022 and 2023. Their findings suggest that age verification is generally supported, with 72% of young people and 86% of parents believing that more effective age limits would improve online safety for young people. However, participants think it likely would not work. They considered other approaches as better options to keeping people safe online, including more safety education, face-to-face dialogue and accountability from social media companies. Concerns about data protection and privacy were raised by both children and adults, specifically around sharing identity documents with online services to prove age and the risk of data breaches and leaks of sensitive information.

The Family Online Safety Institute (FOSI) conducted research which includes includes a cross-country comparison of views on age assurance held by parents and children in the US, UK and

[53] https://bereal.com/terms/
[54] https://bsky.social/about/support/tos#who-can-use
[55] https://discord.com/terms/#2
[56] https://www.goodreads.com/about/terms
[57] https://policy.pinterest.com/en/terms-of-service
[58] Australian Government, "Online Safety Amendment (Social Media Minimum Age) Bill 2024", Available: https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bId=r7284
[59] J. Humphry, O. Boichak and J. Hutchinson, "Emerging Online Safety Issues – Co-creating Social Media with Young People – Research Report," The University of Sydney, Sydney, 2023.

France[60]. This consisted of two parts, firstly a qualitative part with seventy-one parents and children across the US, UK, and France. The second part was a quantitative survey of 3000 parents and children evenly distributed across the three countries. The report has 10 key findings:

1) Parents are highly engaged with their children's digital lives and are invested in facilitating a safe, positive online experience.
2) Children, like parents, want safe and positive online experiences, and children understand that parents monitor online activity with good intentions.
3) Parents see themselves as having the most responsibility for managing their children's access to age-appropriate content, more so than technology companies or the government.
4) Even as parents feel this strong sense of responsibility, they also want more involvement from relevant partners to help safeguard their children.
5) Children also desire an active role in the processes that will shape their digital lives, even if they are not always comfortable discussing their online activities with parents.
6) Age assurance is seen by parents and children as being more about restricting access to content, rather than ensuring safe and beneficial online experiences.
7) There is no clear 'winner' or standout approach when respondents are asked about their preference for current age assurance methods.
8) This ambivalence appears to come down to a question of balancing invasiveness vs. effectiveness.
9) The applied use of biometrics appears to be a promising method of age assurance, as parents and children view it as effectively assessing age.
10) Parents seek age assurance solutions that are effective yet convenient, and they gravitate toward settings that achieve both.

The eSafety Commissioner researched the attitudes of young people towards age assurance and the age-based restriction of access to online pornography[61]. This mixed methods research comprised of an online survey of 1004 participants followed by online focus groups, both with young people aged 16-18. One key finding was that participants were generally in favour of the regulation of online pornography for people under the age of 16. However, they thought that age assurance would be of limited efficacy and expressed concerns about its implementation. Despite this, the young people surveyed thought that pornography sites, dating sites and social media services should use age assurance tools to restrict underage access to online porn.

[60] Family Online Safety Institute (FOSI), "Making Sense of Age Assurance: Enabling Safer Online Experiences", 2022, Available: https://cdn.prod.website-files.com/5f47b99bcd1b0e76b7a78b88/636d13257232675672619f45_MAKING%20SENSE%20OF%20AGE%20ASSURANCE%20FULL%20REPORT%20-%20FOSI%202022_compressed.pdf

[61] The eSafety Commissioner, "Questions, doubts and hopes. Young people's attitudes towards age assurance and the age-based restriction of access to online pornography", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Questions-Doubts-and-Hopes.pdf

Another study by the eSafety commissioner focused on adults' perceptions of age verification for limiting access to pornography[62]. Using a survey of 1200 adults, the study identified broad support for age verification as a safeguard for children, even though the general community was unfamiliar with it conceptually and in practice. There was ambivalence and scepticism on how the technology would work in practice. Participants were concerned about the security and processing of personal data as part of any age verification system. They considered the government was best placed to process their data to ensure data security and to ensure that the system worked in practice. The study identified the need for further communication and education to build knowledge and awareness in several areas. Two of these areas include, firstly, the effectiveness of age verification tools and, secondly, what makes a secure and privacy-preserving tool for ensuring online pornography remains accessible to adults only.

Recently polls have been conducted by Resolve[63] and YouGov[64] to garner public sentiment on the Online Safety Amendment (Social Media Minimum Age) Bill 2024. These polls showed high levels of support for the age restriction, such as 77% of respondents to the YouGov survey. However, the findings also showed doubts whether the age restriction will be efficacious.

In the UK, digital regulators have commissioned several studies into public perceptions of age assurance. One of these is Ofcom's 2022 research into adult user's attitudes to age verification on adult sites[65]. Through an online survey of 2158 adults following by focus groups, it was found that there is broad support for age verification measures to prevent under-18s from accessing online pornography. Also, participants were more likely to accept age verification measures where they expected those measure to be in place. Furthermore, using a credit card was the preferred means for proving age for paid access to pornography. The study also found serious concerns among participants about how user data may be processed and/or stored for the purposes of age verification, with a very low level of trust in the data privacy practices of adult sites. These privacy concerns could be addressed by increased transparency in data management practices, having a choice of methods to verify age and using an independent third-party for the age check rather than the porn sites themselves.

Ofcom commissioned a follow-up survey focused on trust in age assurance measures[66]. They sought to understand the experiences of people aged 16 years old and over accessing pornographic content online and passing any age checks, if encountered, through a survey of 5242 participants. An additional focus was their attitudes towards proving their age on adult sites and the importance of different factors in encouraging them to comply. One key finding was that, of those participants

[62] The eSafety Commissioner, "Public perceptions of age verification for limiting access to pornography", 2021, Available: https://www.esafety.gov.au/research/public-perceptions-age-verification-for-limiting-access-pornography
[63] The Sydney Morning Herald, "Australians like banning teens from social media", 2024, Available: https://www.smh.com.au/politics/federal/australians-like-banning-teens-from-social-media-they-just-don-t-think-it-ll-work-20241210-p5kx9l.html
[64] YouGov, "Support for under-16 social media ban soars to 77% among Australians", 2024, Available: https://au.yougov.com/politics/articles/51000-support-for-under-16-social-media-ban-soars-to-77-among-australians
[65] Ofcom, "Adult Users' Attitudes to Age Verification on Adult Sites", 2022, Available: https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/vsp/attitudes-to-age-verification/2022-adult-attitudes-to-age-verification-adult-sites.pdf
[66] Ofcom, "Barriers to Proving Age on Adult Sites", 2023, Available: https://www.ofcom.org.uk/online-safety/protecting-children/barriers-to-proving-age-on-adult-sites/

that had never been asked to prove their age to access pornographic content online before, 29% said they would comply with the age check and 55% said they would leave the site at the age check. Of those who choose not to prove their age to access pornographic content online:

- 86% had personal data concerns,
- 24% did not think the age check would be accurate and/or reliable.

Ofcom and the UK's Information Commissioner's Office (ICO) commissioned a joint study to explore parents' and children's attitudes towards potential age assurance methods[67]. The research used in-depth interviews followed by deliberative focus groups. There are several relevant key findings from this work. Firstly, most parents felt that services should have age assurance measures, but it can sit in tension with their desire for control and flexibility over what their children do online. Secondly, most children had circumvented current age assurance methods themselves (typically self-declaration on social media platforms) or knew someone who had. Thirdly, many families felt the type of platform the age assurance method was being used on was critical context for which method felt the most appropriate. Overall, however, parents and children felt that hard identifiers such as a passport or driving licence were the most effective age assurance method. Fourthly, both parents and children had concerns about the amount of effort required to use methods. Finally, some parents and children raised concerns about the amount of data sharing required.

2.3. Parental Consent and Parental Control tools

Smirnova et. al. conducted a rapid evidence review of parental controls in everyday life[68]. The evidence reviewed as part of this research consisted of studying user experiences and perceptions of these technologies. They found that parents use controls to limit the time children spend online, filter content or restrict access to it, limit the people who can contact their child, switch off device functions and limit access to specific applications and/or websites. They also found that, to function effectively, such technical measures must address the needs of both children and parents. The evidence suggests that parental control measures that were developed based on identifying family values were perceived more positively by their users.

Stoilova et. al. conducted a follow up study using the same evidence base, focusing on analysing the context and outcomes of use of parental control tools[69]. As before, the evidence included consists of research studying user experience and perceptions of the tools. This review of the effectiveness of parental controls reveals mixed results: some uses of parental controls bring benefits, for example to children's safety, but others have no effect or limit children's opportunities and some have adverse results, for example to family communication.

[67] Ofcom and The ICO, "Families' attitudes towards age assurance", 2022, Available: https://www.gov.uk/government/publications/families-attitudes-towards-age-assurance-research-commissioned-by-the-ico-and-ofcom

[68] S. Smirnova, S. Livingstone and M. Stoilova, "Understanding of user needs and problems: a rapid evidence review of age assurance and parental controls", 2021, Available: https://eprints.lse.ac.uk/112559/

[69] M. Stoilova, M. Bulger and S. Livingstone, "Do parental control tools fulfil family expectations for child protection? A rapid evidence review of the contexts and outcomes of use", 2023, Available: https://doi.org/10.1080/17482798.2023.2265512

In addition to the findings, these studies reveal the need for further functional and non-functional testing of the technical effectiveness of parental consent and parental control tools.

2.4. Children's Rights and Best Interests of the Child

While age assurance technologies are designed to protect children online, they may have a negative impact on children's rights if not implemented carefully. Over recent years, there has been growing awareness of the need to consider children's rights in the digital world.

The United Nations Convention on the Rights of the Child (CRC) was adopted in 1989.[70] It formally codifies children's rights, setting out the freedoms and protections all countries must offer children and young people under 18 years old. It is the basis upon which much domestic legislation in relation to children rests around the world. In 2021, the Council on the Rights of the Child adopted General Comment 25, which makes explicit that children's rights apply in the digital world and provides guidance on how to apply children's rights to the digital world.[71] General Comment 25 (GC25) sets out four principles to guide the implementation of all other rights under the Convention. These are summarised below:

A. **Non-discrimination.** All children should have equal and effective access to the digital environment in ways that are meaningful to them and States parties should take all measures necessary to overcome digital exclusion. States parties should take proactive measures to prevent discrimination, including on the basis of sex, disability, socioeconomic background, ethnic or national origin, language and discrimination against minority or Indigenous children. GC25 also explicitly calls for the prevention of discrimination against children deprived of liberty or in other vulnerable situations.

B. **Best interests of the child.** The best interests of the child is a dynamic concept that requires an assessment appropriate to the specific context. The digital environment was not originally designed for children, yet it plays a significant role in children's lives. In considering the best interests of the child, states parties should have regard for all children's rights, including the rights to seek, receive and impart information, to be protected from harm and to have their views given due weight and ensure transparency in the assessment of the best interests of the child.

C. **Right to life, survival and development.** Opportunities provided by the digital environment play an increasingly crucial role in children's development. Risks relating to content, contact, conduct and contract encompass, among many other things, violent and sexual content, cyberaggression and harassment, gambling, exploitation and abuse, including sexual exploitation and abuse and the promotion of or incitement to suicide and other life-threatening activities. States parties should

[70] UN General Assembly, "Convention on the Rights of the Child," 1989, Available: https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child.

[71] UN Committee on the Rights of the Child, "General comment No. 25 (2021) on children's rights in relation to the digital environment," CRC/C/GC/25, 2021. Available: https://digitallibrary.un.org/record/3906061/files/CRC_C_GC_25-EN.pdf.

identify and address the emerging risks that children face in diverse contexts, including by listening to their views on the nature of the risks that they face.

D. **Respect for the views of the child.** Children reported that the digital environment afforded them crucial opportunities for their voices to be heard in matters that affected them. The use of digital technologies can help to realize children's participation at the local, national and international levels. States parties should involve all children during the development of legislation or during the undertaking of other activities, which affect them. They should ensure that digital service providers actively engage with children, applying appropriate safeguards and give their views due consideration when developing products and services.

In addition to the above principles, GC25 highlights the importance of respecting the **evolving capacities of the child** as an enabling principle that addresses the process of their gradual acquisition of competencies, understanding and agency. This process has particular significance in the digital environment, where children are mor likely to be unsupervised.

On the adoption of GC25, the 5Rights Foundation, who acted as the Chair of the Steering Committee on General Comment 25, published a child-friendly version of the document.[72] This provides a summary of GC25 in accessible language, highlighting that the digital world must take children's ages into account when providing for their needs.

Livingstone, Nair, Stoilova, van der Hof & Caglar combined legal and social research methods to comprehensively examine the legal, technical and practical challenges of age assurance from the perspective of children's rights.[73] The authors find that current approaches vary in effectiveness and are often ineffective, with different approaches being taken in different sectors. They call for clear guidelines on the security, transparency and inclusiveness of age assurance methods with specific attention to those methods which utilise artificial intelligence. The authors advocate for a child rights-respecting approach to age assurance, emphasising the need for privacy-preserving approaches and consideration of children's evolving capacities.

In their analysis of age assurance in the lives of children and families, they find that little research has asked how age assurance is managed in the domestic context. Given the diversity of families, it is unlikely that age assurance will have uniform impacts in all domestic contexts. Where policymakers rely on parental management of children's digital activities, outcomes are likely to be iniquitous given parents' different resources, competencies, etc. However, there is little evidence exploring the use of age assurance across diverse family groups at present. Age assurance could ease the task parents face of raising children in a rapidly changing digital world. However, the authors argue that it is ultimately not clear whether age assurance can be designed in ways that respect children's rights holistically without stimulating new and creative workarounds.

Having said this, the authors go on to highlight that to safeguard children's rights in the digital environment, it is necessary to know when users are likely to be children, unless digital services are

[72] 5Rights Foundation, "In our own words: Young people's version of General Comment No. 25 on children's rights in relation to the digital environment," 2024. Available: https://5rightsfoundation.com/wp-content/uploads/2024/09/In-our-own-words-young-peoples-version-of-GC25.pdf.

[73] S. Livingstone, A. Nair, M. Stoilova, S. van der Hof and C. Caglar, "Children's rights and online age assurance systems: The way forward," *The International Journal of Children's Rights*, vol. 32, no. 3, pp. 721–747, 2024. Available: https://doi.org/10.1163/15718182-32030001.

made appropriate for all ages by design. Age assurance may be necessary to safeguard children's rights, but age assurance tools themselves should be designed in a way that protects children's rights. They find that although age assurance remains controversial, there are strong grounds for age assurance as a norm, together with privacy-by-design and that it is plausible that age assurance could be designed in ways that respects children's rights.

The UK Council for Internet Safety (UKCIS) Digital resilience Working Group, chaired by Vicki Shotbolt and Dr Richard Graham, was established to develop and coordinate a digital resilience strategy aiming to enable the development of digital skills, emotional understanding and effective responses to online problems. The Working Group produced the Digital Resilience Framework and an online hub to support the dissemination, application and development of a resilience-based approach to online safety.[74] The framework suggests that supporting the development of digital resilience is an effective way to ensure children are safer online. Resilience adapts and grows through activation, in response to context, experience and learning. The authors stress that this does not mean children should simply be expected to cope with bad situations, which would lead to a toxic environment. Instead, children should be supported to understand when they are at risk online, know how to seek appropriate help, learn from their experience, adapt their future choices, and recover when things go wrong by receiving the appropriate level of support.

2.5. Effectiveness of Age Assurance

The US National Institute of Standards and Technology (NIST) Face Age Technology Evaluation (FATE) Age Estimation is the most prominent example of technical testing of age assurance systems[75]. It provides a comparison of the accuracy of a range of face age estimation systems, submitted by providers on a voluntary basis up to four times a year. It also describes the variance of accuracy of each system across different demographics / features, including gender and skin tone, to assess bias in performance. However, their evaluation focuses solely on testing the criteria of accuracy and bias, of one kind of age assurance: face age estimation. It also uses a fully automated testing approach which does not provide insight into real-world performance and the user experience. Another limitation is that the dataset used for testing consists of images from USA immigration visas, arrest mugshots, border crossings and immigration offices. These differ to images taken when users are browsing online services or physical retail stores.

In 2024, two significant theoretical evaluations – without any technical testing – were conducted on a range of theoretical approaches to age assurance. These evaluations did not assess the actual systems that are available on the market.

[74] UK Council for Internet Safety, "Digital Resilience Framework," 2019. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831217/UKCIS_Digital_Resilience_Framework.pdf.

[75] National Institute of Standards and Technology, "Face Analysis Technology Evaluation (FATE) Age Estimation & Verification", Available: https://pages.nist.gov/frvt/html/frvt_age_estimation.html

Sas and Mühlberg[76] reviewed 9 age assurance methods, including self-declaration, age declaration coupled with email confirmation, vouching, AI profiling, biometric analysis, capacity testing, hard identifiers, digital identities and proxies for official documentation. They also considered age proof transmission methods, including direct collection by online service providers, connection with a third-party account and variations of using age tokens. Age-token approaches included age tokens directly transmitted to service providers, the "double-blind" method, age tokens on a centralised digital wallet, age tokens on decentralised wallets, age tokens on the user's terminal and age tokens at browser-level. These were all assessed for the likelihood of occurrence of several risks of age assurance:

- User identification
- Loss of online anonymity
- Privacy intrusion
- Commercial profiling
- Victim targeting
- Identity theft
- Data fraud
- Restriction of user's autonomy
- Restriction of user's fundamental rights
- Exclusion and marginalisation
- Biases and inaccuracy
- Feasibility challenges
- Circumvention

The assessment was performed using interviews with researchers, civil society organisations, age assurance system providers and regulatory authorities. This was followed by desk research and analysis of relevant legal frameworks and age assurance literature.

The report highlights the potential privacy and inclusivity concerns of age assurance systems and the impacts of their deployment on user's fundamental rights. However, promising avenues are also identified, such as privacy-preserving techniques using double-blind transmission methods. The scope of this study did not include a technical evaluation of age assurance technologies available in the market today. Risks such as biases and inaccuracy, exclusion and marginalisation and feasibility challenges require a technical assessment of system in the market.

Shaffique and van der Hof also performed a theoretical evaluation of age assurance methods[77]. Using desk research and analysis, ten main methods of age assurance were assessed: (1) Self-declaration; (2) Hard identifiers; (3) Credit cards; (4) Self-sovereign identity; (5) Account holder

[76] M. Sas and J. T. Mühlberg, "Trustworthy Age Assurance?" The Greens Cluster: Social & Economy. In The European Parliament., 2024.

[77] M. R. Shaffique and S. van der Hof, "Research report: Mapping age assurance typologies and requirements," Directorate-General for Communications Networks, Content and Technology, Better Internet for Kids (BIK), European Commission, 2024.

confirmation; (6) Cross-platform authentication; (7) Facial age estimation; (8) Behavioural profiling; (9) Capacity-testing; and (10) Third-party age assurance service. Ten key requirements of age assurance systems were also defined and explored: proportionality, privacy, security, accuracy, functionality, inclusivity, participation, transparency, notification mechanisms and considering the child's perspective. The study found that age assurance is a complex matter, including that different age assurance methods have different strengths and weaknesses. For example, there is sometimes a tension between the level of assurance in the user's age and the level of privacy, where methods that may offer a higher level of assurance may require further personal data from the user. Another factor is that some methods may be easy to use, but that may also make them easy to circumvent. It is, therefore, difficult to determine the right approach to age assurance for any given situation. As with the previous report, this study also does not include any technical testing. Therefore, some requirements considered in this study require further investigation through technical testing of systems in the market to provide robust research evidence. Some of the relevant requirements include accuracy, inclusivity, functionality and participation.

Another prominent assessment of age assurance technologies is Enex TestLab's 2022 evaluation commissioned by the eSafety Commissioner[78]. It is notable for including technical testing of two age assurance systems, alongside theoretical evaluation of these and several other systems. The sample size used for the technical testing was 15 participants, using publicly available demo versions of age assurance technologies, which may not be as effective as production versions. These limitations may impact confidence in some findings from the study.

In the UK, Ofcom's draft guidance (due to be updated in January 2025) for services providers publishing pornographic content[79] defines four key technical criteria and two principles for effective age assurance. Alongside the criteria, they provide a theoretical evaluation of age assurance systems that justify them.

The technical criteria are:

- Technical Accuracy: how an age assurance method can correctly determine the age of a user under test lab conditions.
- Robustness: the degree to which an age assurance method can correctly determine the age of a user in unexpected or real-world conditions.
- Reliability: the degree to which the age output from an age assurance method is reproducible and derived from trustworthy evidence.
- Fairness: the extent to which an age assurance method avoids or minimises bias and discriminatory outcomes.

[78] The eSafety Commissioner, "Appendix 8: Independent assessment of age assurance and safety technologies, Roadmap for age verification - background report", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Appendices-to-background-report.pdf

[79] Ofcom, "Guidance for service providers publishing pornographic content - Consultation on draft guidance on age assurance and other Part 5 duties", 2023, Available: https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/272586-consultation-guidance-for-service-providers-publishing-pornographic-content/associated-documents/consultation-guidance-for-service-providers-publishing-pornographic-content-online/?v=368673

The principles are:

- Accessibility: this covers the principles that the age assurance should (a) be easy to use and (b) work effectively for all
- Interoperability: re-using the result of an age check across multiple services allowing different providers of age assurance methods to share this information in line with data privacy laws.

These criteria and principles align with characteristics, criteria and requirements discussed elsewhere in the literature. The draft guidance specifically raises the lack of evidence of the effectiveness of age assurance systems in practice (whether deployed in lab environments or production environments).

Two important studies address the measurements of age assurance systems. The UK Information Commissioner's Office (ICO) commissioned part 1 of a study into the criteria and metrics required to assess the effectiveness of age assurance techniques and to understand the potential for consistency, comparability and standardisation of measurement[80]. Key metrics were defined and classified by the type of age assurance output produced; either continuous where the output is the age computed by the system or binary where the output is either 'yes' or 'no' indicating that the age meets a threshold or not. For continuous approaches, metrics include:

- Mean Absolute Error (MAE): The central value of the absolute errors (i.e. difference between output age and real age, ignoring whether it is higher or lower) of the sample.
- Standard Deviation (SD): The amount of variation or spread over the distribution of absolute errors in the sample.

For binary approaches, the metrics include

- True Positive Rate (TPR): the sensitivity of the technology's ability to correctly detect people who are over the age threshold.
- False Positive Rate (FPR): the technology's probability of false alarm (i.e., incorrectly identifying someone as being over the age threshold).
- Positive Predictive Value (PPV): the proportion of the sample correctly identified as being over the age threshold given that they have been predicted as being over the age threshold.

The ICO study did not cover measurement of the overall effectiveness of age assurance systems. It instead focused primarily on the criterion of accuracy, while also describing some considerations for inclusion, security and privacy.

Follow-up research was commissioned by Ofcom and the ICO to further explore the measurement of accuracy levels achievable by different age assurance systems[81]. The research provided self-

[80] The UK Information Commissioner's Office (ICO), "Measurement of Age Assurance Technologies", 2022, Available: https://ico.org.uk/media/about-the-ico/documents/4021822/measurement-of-age-assurance-technologies.pdf

[81] ICO and Ofcom, "Measurement of Age Assurance Technologies Part 2 – Current and short-term capability of a range of Age Assurance measures", 2023, Available: https://www.drcf.org.uk/publications/papers/measurement-of-age-assurance-technologies

reported accuracy levels for a range of age assurance technologies from providers that participated in the study. The study also proposed the expression of a single 'headline' accuracy metric for all age assurance systems, which should be accompanied by further specific metrics including MAE, TPR, FPR, etc. Future work was identified to establish ranges of accuracy by performing technical assessment of age assurance systems. This research also has certain limitations, including:

- As companies' accuracy figures were self-declared, the study's hypothetical indicators of confidence should be considered illustrative.
- Technical accuracy is only one dimension of age assurance systems and the report does not cover other aspects of the overall effectiveness of these technologies.
- Difficulties in acquiring adequate, independent data sets for testing age assurance technologies pose an additional challenge for measuring technical accuracy.

2.6. The eSafety Commissioner's Call for Evidence Responses, Consultation and Cross-Sector Workshops

As part of its work on age assurance, The Australian eSafety Commissioner conducted a call for evidence[82], two rounds of stakeholder consultations[83]and several cross-sector workshops[84].

According to these pieces of eSafety research, more than three in four Australian adults support government implementation of age assurance for online pornography. However, there are concerns about effectiveness, privacy, and security. These themes – and concerns about accessibility, fairness and bias – were echoed by young people and multi-sector stakeholders.

These considerations informed the development of assessment criteria which an independent test lab applied to review age assurance technologies available on the market, including biometric (age and voice) estimation and identity document (ID)-based tools. They also reviewed a recent European age assurance pilot and international standards for age assurance.

The independent assessment found the age assurance market is immature but developing. Each technology has benefits and trade-offs. For example, ID-based solutions can provide a high level of certainty but risk excluding those without access to ID, whereas facial estimation technology is promising but may offer a lower level of certainty, and may vary in accuracy based on skin tone,

[82] The eSafety Commissioner, "Appendix 2: Call for evidence request and thematic summary of submissions, Roadmap for age verification - background report", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Appendices-to-background-report.pdf?v=1733502339463

[83] The eSafety Commissioner, "Appendix 5: Consultation Summaries, Roadmap for age verification - background report", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Appendices-to-background-report.pdf?v=1733502339463

[84] The eSafety Commissioner, "Appendix 7: Cross-sector workshop summary, Roadmap for age verification - background report", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Appendices-to-background-report.pdf?v=1733502339463

gender, and physical differences. Consumer choice to select the option users are comfortable with, and which works for them, is a key lesson from the European pilot.

For these and other reasons explored in these pieces of research, age assurance technologies should be trialled in Australia, based on lessons from pilots conducted elsewhere, before being mandated. While eSafety should be involved in the development, implementation, and evaluation of any such pilot, they did not at the the time have the resources, capabilities, or expertise to lead its delivery.

2.7. Australia Signals Directorate (ASD): The Information Security Manual (ISM)

The Australian Signals Directorate (ASD) produces the Information Security Manual (ISM)[85]. The ISM is a cyber security framework that an organisation can apply, using their risk management framework, to protect their information technology and operational technology systems, applications and data from cyber threats. It is a set of guidelines published by the Australian Cyber Security Centre (ACSC) to help organizations protect their information and systems from cyber threats. It is primarily targeted at Australian government agencies and the software systems they operate and/or procure from suppliers.

The ISM draws from National Institute of Standards and Technology (NIST) Special Publication (SP) 800-37 Rev. 2, Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy[86]. Broadly, the risk management framework used by the ISM has six steps: define the system, select controls, implement controls, assess controls, authorise the system and monitor the system.

The manual also defines several Cyber Security Principles, followed by several Cyber Security Guidelines, with the latter subdivided to target specific organisational roles, processes or infrastructure elements. These subdivisions contain guidance and recommended controls to implement the cyber security principles.

2.8. Australia's Digital ID System

Australia's Digital ID System[87] is relevant to age assurance systems, as a digital identity may be able to prove an individual's age. Although an individual's age is an attribute of their identity, it is not necessarily the case that establishing the full identity of an individual in a global context is needed to gain age assurance[88]. In many cases, establishing an individual's age should not establish their

[85] Australia Signals Directorate (ISM), "The Information Security Manual (ISM)", Available: https://www.cyber.gov.au/resources-business-and-government/essential-cyber-security/ism

[86] National Institute of Standards and Technology (NIST), "NIST SP 800-37 Rev. 2 Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy", 2018, Available: https://csrc.nist.gov/pubs/sp/800/37/r2/final

[87] Australian Government, "Australia's Digital ID System," Available: https://www.digitalidsystem.gov.au/

[88] ISO/IEC DIS 27566 Introductory Text

full identity. As such, while the process of age assurance may in some instances be connected to identity verification, it can also be performed in ways other than via identity verification. The approach to assessment of age assurance systems can, therefore, be informed by existing approaches to the assessment of digital identity systems, such as that specified in Australia's digital ID system.

This system is made up of two parts: (a) the voluntary accreditation scheme for digital ID service providers and (b) the Australian Government Digital ID System.

The voluntary accreditation scheme is open to all government and private sector digital ID service providers across the economy. Accreditation demonstrates that a provider meets strict rules and standards for:

- privacy protection
- security
- usability
- accessibility
- risk management
- fraud control and more.

These services are also subject to additional privacy safeguards. These are set out in law, with civil penalties for non-compliance. Accreditation is only mandatory if a provider wants to join the Australian Government Digital ID System.

Accredited providers will be able to display a Trustmark. This shows they provide accurate, trustworthy digital ID services that protect people's personal information and that they are regulated.

Since 1 December 2024, the Digital ID Regulator is responsible for the Accreditation Scheme and accrediting digital ID providers.

The Australian Government Digital ID System is designed to provide a secure, convenient and voluntary way for people to verify who they are online. It is delivered and supported by six agencies:

- Department of Finance
- The System Administrator
- Services Australia
- The Australia Competition and Consumer Commission
- Office of the Australian Information Commissioner
- The Treasury's Data Standards Body
- Australian Taxation Office

Some accredited providers are participating in the Australian Government Digital ID System, thus allowing their use to access government online services.

There are also many government services who use the system to verify their users. By December 2026 private businesses will be able to apply to join the Australian Government Digital ID System.

The eSafety Commissioner stated[89] that before the use of specific age assurance technologies is prescribed, stakeholders reported to them that measures need to be in place to alleviate concerns about privacy and security, and also satisfy the implementation factors raised above. These include the need for independent oversight, strong governance, transparency, trustworthiness, fairness, and respect for human rights. To promote international harmonisation, this work should be aligned with relevant international standards which are in place or under development.

There is substantial work already well underway to develop such a framework for Australia's Digital Identity System. The Australian Government should build on this work to establish a similar regulatory accreditation regime to the Trusted Digital Identity Framework for age assurance

Establishment of such a regulatory scheme should include consideration of a strong, independent regulator or accreditation body with functions including:

- accreditation
- compliance and enforcement related to accreditation-enabling capabilities, such as:
  - register of accredited providers
  - application portals for prospective providers
  - any enabling IT infrastructure for the regulatory regime
- general regulatory functions – reporting, publication of guidance etc.

Based on eSafety Commissioner's consultation across government, at this stage, there is likely no existing regulator or accreditation body that has the full breadth of experience and capability to provide all the necessary functions, particularly in relation to this type of digital accreditation. However, building on the work of equivalent accreditation regimes in government such as the Trusted Digital Identity Framework could provide a good basis for starting discovery work on how an accreditation scheme could operate.

In addition to this, further criteria may be required specifically for the accreditation of age assurance systems. This is because the wide array of age assurance systems works in various ways, relying on either a verified date of birth, the analysis of an individual's biological or behavioural features that vary with age or verified information which indirectly implies than an individual is over or under a certain age. This is distinct from digital identity, where only the former option is relevant (i.e. reliance on a verified date of birth). The following additional criteria, as per the literature review and DITRDCA's guidance, are also needed:

[89] The eSafety Commissioner, "Roadmap for age verification and complementary measures to prevent and mitigate harms to children from online pornography", 2023, Available: https://www.esafety.gov.au/sites/default/files/2023-08/Roadmap-for-age-verification_2.pdf

- Accuracy (how well the technology can detect a user's age)
- Interoperability (how well the technology can be used across multiple online platforms)
- Reliability (how consistently the technology can produce the same result)
- Minimisation of bias (how well the technology avoids racial or other bias)
- Human rights protections (i.e. accessibility for all users, including people with disability, as well as applicable rights under the *UN Convention on the Rights of the Child*)

Therefore, digital identity systems accredited under voluntary accreditation scheme may need to be further assessed against the additional criteria. This is an area for further exploration with the agencies responsible for the Digital ID system:

1) Department of Finance
2) The Office of the System Administrator
3) Services Australia
4) The Australia Competition and Consumer Commission
5) The Office of the Australian Information Commissioner
6) The Data Standards Body
7) Australian Taxation Office

3. Materials and Methods

This trial will use primarily quantitative methods, along with supplementary qualitative methods, to assess the systems in scope against the specified criteria. There are four pillars to the project methodology.

The first pillar is the development of an ethical framework, including activities relating to data protection, child safeguarding, impartiality and inclusion of Aboriginal Australians and Torres Strait Islander peoples. This will inform all trial activities and deliverables.

The second is the assessment methodology, including the evaluation criteria and test strategy, which will be derived from and informed by all relevant ISO standards.

The third pillar is stakeholder engagement, including the recruitment of user participants, the recruitment of technology providers, vendor interviews and strategies to inform all relevant stakeholders.

The fourth and final pillar is project management and risk assessment.

The pillars are visualised below and each one is described in detail in the following four sections.

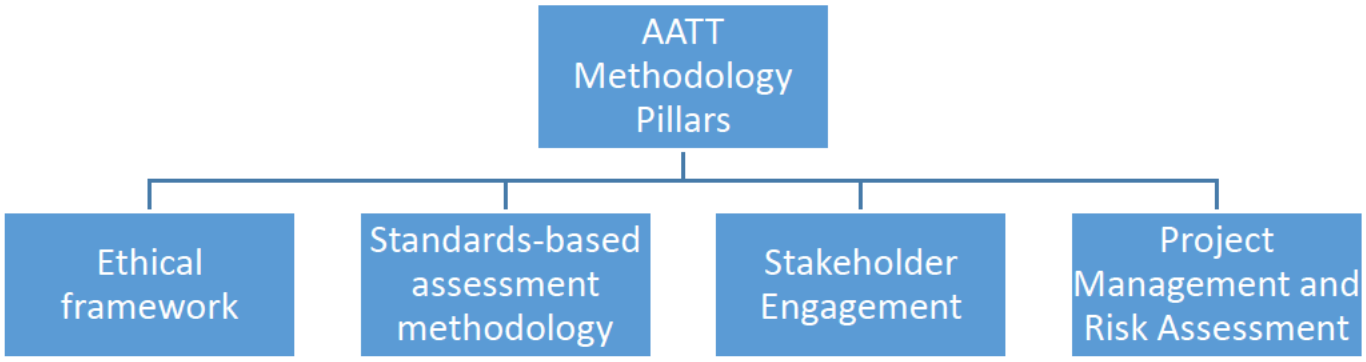

Figure 1: Four pillars of the AATT methodology

4. Test Strategy

4.1. Introduction

4.1.1 Overall Scope

The scope of the test effort includes technologies which provide:

- Age Assurance (AA), including:
  - Age verification (AV)
  - Age inference
  - Age estimation (AE)
- Parental controls
- Parental consent

for the following age gates:

- 18+ age gate
- 16+ age gate
- 13+ age gate

Out of scope:

1. Exact age
2. 13-16 age range (as this is covered by the gates above)

4.1.2 Audience

This test strategy provides guidance to the testing team executing the technology trial and stakeholders wishing to understand the process used in the evaluation.

4.1.3 References

The test strategy for this project is aligned to ISO/IEC 29119 and uses the following standards as reference:

- ISO/IEC 25010:2023 Systems and software Quality Requirements and Evaluation (SQuaRE) - Product Quality Model
- ISO/IEC 25040:2011 Systems and software Quality Requirements and Evaluation (SQuaRE) – Evaluation process
- The ISO 29119 Software and systems engineering – Software testing series
- The ISO/IEC 30107 Biometric Presentation Attack Detection series

- ISO/IEC DIS 27566-1:2025 Age assurance systems – Part 1: Framework
- IEEE 2089.1-2024 IEE Standard for Online Age Verification
- ISO 9241-11:2018 Ergonomics of human-system interaction — Part 11: Usability: Definitions and concepts

4.2 Vendor Interviews

Each participant vendor or platform will be invited to participate in a face-to-face or virtual interview with the Age Assurance Technology Trial team. The interview will be structured to elicit the vendor's approach to securing age assurance. Interviews will be on-the-record and recorded, but it is not expected that vendors would be asked to reveal anything that is secret or not openly available on the information pages about their product (even if it might be challenging to find). We may quote extracts from the transcripts in the final report. We intend to share a summary of the transcript with the vendor and, subject to fact checking, intend to make this publicly available.

Vendors that are unwilling or unable to complete a face-to-face interview will be provided with a questionnaire. We intend to publish a list of any vendors that are participants in the trial but declined to participate in the interview process.

Each interview will be bespoke to the vendor, but the types of questions that may be asked include:

Introduction

Thank you for participating in this interview as part of the Australian Age Assurance Technology Trial. The purpose of this session is to gain a deep understanding of your system, how it operates and the safeguards it has in place. We are looking to learn about your approach, capabilities and any limitations to assess your system's suitability and effectiveness in this field.

Section 1: Background and Overview

1. Can you provide an overview of your system and its primary functionality?
2. What is it that you do to ensure age assurance?
3. What inspired the development of your technology and what key problem(s) does it aim to solve?
4. What industries or use cases are currently utilizing your system?
5. Have you carried out any assessments of the impact your technology may have on fundamental rights, including the rights of children?

Section 2: Privacy and Data Protection

6. What types of data does your system collect, process and store?
7. How do you decide what data is collected?
8. For what specific / discrete purposes do you collect data?
9. Have you implemented any specific measures to comply with Australian privacy laws, including the Privacy Act and the Children's Privacy Guidelines?

10. Do you have measures in place to handle data deletion requests or cases where a user withdraws consent for their data to be held and / or processed?
11. Do you employ any anonymization or pseudonymization techniques?
12. Do you have measures in place to limit the impact of your system / technology on the user's digital footprint?

Section 3: Security Measures

13. What security protocols are in place to protect user data, both in transit and at rest?
14. Have you conducted independent security audits or penetration tests? If so, could you share the outcomes or certifications obtained?
15. Do you have measures in place to protect your system from misuse or attacks, such as spoofing or fraudulent attempts to bypass age verification?
16. How quickly can you respond to and address vulnerabilities or breaches?
17. How do you ensure that your system is fail safe?

Section 4: Accuracy and Effectiveness

18. Can you describe the accuracy rates of your system and how they are measured (e.g., false positives/negatives)?
19. How is your system testable?
20. What external validation or third-party testing has been conducted to verify your claims of accuracy?
21. How does your system handle edge cases, such as where an individual's age is estimated as on / just above the particular age threshold?
22. Do you have mechanisms in place to ensure that your system continually improves in accuracy over time?

Section 5: Accessibility and Inclusivity

23. How do you ensure your system is accessible to users with disabilities?
24. How do you ensure your system is accessible to those with limited technical literacy?
25. How do you measure any discrepancies in performance across different demographic groups, and what measures do you take to mitigate these discrepancies?
26. Have you taken any measures to account for the particular cultural context of Australia, such as consulting with First Nations peoples?
27. How does your system address children from looked after care (i.e. who either do not live with or do not have parents)?
28. Do you have mechanisms in place for users to report issues, provide suggestions for improvement, or raise complaints? Could you describe these?

Section 6: Transparency and User Trust

29. What information, if any, do you offer users to help them understand why or how age decisions are made?
30. Do you publish white papers, explainer videos, or other resources in accessible languages?
31. Do you provide users with access to a record of their data and how it was processed?
32. Have you taken steps to communicate the workings of your system to end-users, especially minors and parents, in an understandable way?

33. Are there any user-facing tools or dashboards that provide insights into your system's decisions?

Section 7: Configurability and Scalability

34. How configurable is your system for different use cases or compliance requirements in Australia?
35. Can your system integrate seamlessly with existing platforms and systems, such as e-commerce, gaming or social media sites?
36. How scalable is your system for organizations with varying sizes and levels of user activity?

Section 8: Safeguards and Ethical Considerations

37. What safeguards have you implemented to ensure your system is not overly intrusive or restrictive for users?
38. Can your system operate in a way that respects the autonomy of older teens while still ensuring the safety of younger children?
39. How do you address the evolving capacity of children to make their own decisions?
40. In considering the role of parents, how do you manage the boundaries of individuality of the parents and of their children?
41. Does your system support children to access age appropriate content to develop their own individuality, resilience and communities of interest?
42. How do you manage the ethical expectations of your stakeholders?

Section 9: Research and Continuous Improvement

43. What research has been conducted to develop and validate your system? Are there any peer-reviewed studies or white papers available?
44. How do you stay up to date with advancements in age assurance technologies and ensure your system remains state-of-the-art?
45. Are there mechanisms in place for continuous feedback and iteration based on real-world deployment?

Section 10: Closing and Additional Insights

46. In your opinion, what is the biggest strength of your system compared to competitors?
47. What are the most significant challenges or limitations your system faces?
48. Is there anything we have not covered that you believe is crucial to understanding your system or its role in the Australian Age Assurance Technology Trial?

Conclusion

Thank you for providing detailed insights into your system. This information will contribute to assessing and understanding age assurance technologies in the context of the trial. If we have follow-up questions, would you be open to providing further details?

4.3 Testing Objectives

The technology trial seeks to evaluate whether the technology provided by trial participants, whether individually or in combination, meets the Australian government's requirements for a range of online services to implement age assurance and parental control and consent.

The quality criteria for the technology trial are outlined in the tender and described in Section 4.3.1. The risk assessment and test design processes summarised in this document use ISO/IEC 25010 quality attributes and ISO/IEC 30107 biometric security criteria as points of reference.

The goal of the testing conducted within the technology trial is not intended to replace any detailed software testing process which would normally be undertaken by a company during the acquisition and deployment of any specific age assurance technology which may be selected to promote user safety and/or comply with relevant regulatory frameworks. Rather, the goal is to assess that the capability of technologies available within market at the present time.

4.4 Evaluation Scope and Approach

4.4.1 Evaluation/Quality criteria in scope

1) **Accuracy**: how well the technology can detect a user's age. Assessing the variance of accuracy across different environmental conditions and contexts is in scope to a certain degree, including but not limited to:
   - Some, but not all, lighting conditions
   - Some, but not all, audio conditions
   - Some, but not all, end user devices
   - Some, but not all, operating systems
2) **Interoperability**: how well the technology can be used across multiple online platforms
3) **Reliability**: how consistently the technology can produce the same result
4) **Ease of use**: how simple the technology is to operate, including how the system offers functionality appropriate to the capacity and age of a child or adult, up to and including those of retirement age, who may use the service
5) **Minimisation of bias**: how well the technology avoids racial or other bias, recognising that the complete elimination of bias is unattainable.
6) **Protection of privacy**: how well the technology protects users' personal information
7) **Human rights protections** i.e. accessibility for all users, including people with disability, as well as applicable rights under the *UN Convention on the Rights of the Child*
8) **Data security**: how well the technology safeguards users' personal information from unauthorised access, breaches or theft through, for example, the use of security by design principles and resistance to presentation attacks
9) **Circumvention**: Resistance to certain kinds of attacks – Clause 9 of ISO 27566-1, including:

- Biometric presentation attacks: where individual presents pictures, replayed videos or 3D masks to the system.
- Spoofing attack: when an individual is attempting to try to fool the age estimation method, e.g., by trying to look older than they really are while wearing a hat, glasses, a fake beard or a fake moustache.

10) **Technology Readiness Level (TRL):** According to the Australian Government Department of Defence, the use of TRLs enables consistent, uniform discussions of technical maturity across different types of technology[90]. TRLs are based on a scale from 1 to 9 with 9 being the most mature technology. The New South Wales (NSW) Government's Invest NSW initiative provides a tool to calculate the TRL level for a technology system[91]. The table of TRL levels is set out below.

TRL	Definition
TRL 1	**Basic Research**: Initial scientific research has been conducted. Principles are qualitatively postulated and observed. Focus is on new discovery rather than applications.
TRL 2	**Applied Research**: Initial practical applications are identified. Potential of material or process to solve a problem, satisfy a need or find application is confirmed.
TRL 3	**Critical Function or Proof of Concept Established**: Applied research advances and early stage development begins. Studies and laboratory measurements validate an
TRL 4	**Lab Testing/Validation of Alpha Prototype Component/Process**: Design, development and lab testing of components/processes. Results provide evidence that performance targets may be attainable based on projected or modelled systems.
TRL 5	**Laboratory Testing of Integrated/Semi-Integrated System**: System Component and/or process validation is achieved in a relevant environment.
TRL 6	**Prototype System Verified**: System/process prototype demonstration in an operational environment (beta prototype system level).
TRL 7	**Integrated Pilot System Demonstrated**: System/process prototype demonstration in an operational environment (integrated pilot system level).
TRL 8	**System Incorporated in Commercial Design**: Actual system/process completed and qualified through test and demonstration (pre-commercial demonstration).
TRL 9	**System Proven and Ready for Full Commercial Deployment**: Actual system proven through successful operations in operating environment and ready for full commercial deployment.

[90] https://www.dst.defence.gov.au/sites/default/files/basic_pages/documents/TRL%20Explanations_1.pdf
[91] https://www.investment.nsw.gov.au/assets/Grants-and-rebates/MVP-Technology-Readiness-Level-Tool.xlsx

4.4.2 Criteria Out-of-Scope

1. Volume and stress testing of each system. We will assess responsiveness from a user experience perspective. But it is not feasible to stress test the system to identify, for example, the number of age checks that can be successfully performed per hour.
2. The variance of an age assurance system's accuracy in every possible environmental condition and context is not feasible in the timeframe of the AATT. In-scope environmental conditions and contexts are set out in the previous subsection. As a result:
    a. Some lighting conditions will be out-of-scope. We will test common lighting conditions but not all.
    b. Some audio conditions will be out-of-scope. We will test common audio conditions but not all.
    c. Some end user devices will be out-of-scope. We will test common end user devices but not all.
    d. Some operating systems will be out-of-scope. We will test some common operating systems but not all.
3. Technical testing for protection of privacy, such as the correct implementation of data encryption algorithms and protocols.
4. Technical testing for security mechanisms, such as the correct implementation of de-identification protocols or access controls.
5. Technical testing of security vulnerabilities in the age assurance system, such as penetration testing. This is distinct from the circumvention criterion in which some biometric presentation attack detection tests are in-scope.
6. Technical testing of fraud attacks – distinct from the circumvention criterion listed above – where users make deliberate, concerted efforts to evade the age assurance check which are beyond reasonable expectations for providers to mitigate. Examples include adults assisting a child to provide a fake age by completing the age check on their behalf.

4.4 Evaluation Matrix

The ISO/IEC 25010[92] standard, part of the Systems and Software Quality Requirements and Evaluation (SQuaRE) series, provides a robust framework for evaluating software and system quality. This analysis aligns the standard's product quality model with the specific requirements of the Age Assurance Technology Trial (AATT). By integrating ISO/IEC 25010 into the evaluation design, the trial ensures consistency, precision, and adherence to international best practices.

[92] ISO 25010:2023 Systems and software engineering — Systems and software Quality Requirements and Evaluation (SQuaRE) — Product quality model, 2023, https://www.iso.org/standard/78176.html

This table below details how ISO/IEC 25010's nine quality characteristics and sub-characteristics are mapped to the trial's core contexts: accuracy, reliability, interoperability, minimisation of bias, ease of use, privacy protection, data security, and human rights protections.

Final Evaluation Criteria	Sub-criteria	Mapping to ISO 25010	Mapping to ISO 25040	Mapping to IEEE 2089.1	Mapping to ISO 27566-1
Accuracy	FPR, FNR, TPR, TNR	Functional correctness	Specification of quality metrics	Accuracy, classification errors	Functional effectiveness
Interoperability	API success rate, data exchange capability	Interoperability	Specification of the evaluation plan	Interoperability	Functional interaction
Reliability	Fault tolerance, MTBF	Reliability	Execution of evaluation tests	Fault recovery	Risk identification
Ease of use	Usability score, accessibility testing	Interaction capability	Quality requirements validation	Accessibility considerations	Interaction inclusivity
Minimisation of bias	Parity analysis, demographic fairness	Interaction capability	Specification of the evaluation plan	Bias mitigation measures	Inclusivity and fairness
Human rights protections	Data minimisation, ethical compliance	Security, flexibility	Evaluation report conclusions	Human rights impact	Ethical protections
Protection of privacy	Encryption, purpose limitation	Security	Specification of quality metrics	Privacy by design	Privacy and confidentiality

Data security	Audit trails, data breach prevention	Security	Execution of evaluation tests	Security effectiveness	Security resilience
Circumvention	Resistance to bypass attempts	Reliability, security	Execution of evaluation tests	System robustness	Functional robustness

Table 1 Mapping ISO 25010 to the trial's evaluation criteria

The **evaluation matrix** for the trial is described in Table 2 below. It is designed to systematically assess systems and software quality within the AATT based on the ISO/IEC 25040[93] standard. The matrix incorporates the product quality model (ISO/IEC 25010) and aligns it with project-specific requirements (e.g., accuracy, privacy, security, and usability). This structure ensures that all critical quality aspects are evaluated comprehensively and objectively.

ISO/IEC 25010 Characteristic	**Sub-characteristic**	**Evaluation Metric**	**Weight (%)**	**Threshold**	**Measurement Method**
Functional Suitability	Completeness	% of age scenarios covered	15	≥ 95%	Test coverage analysis
	Correctness	% of accurate verifications	20	≥ 98%	Accuracy testing
	Appropriateness	% of tasks successfully performed	10	≥ 90%	User testing
Performance Efficiency	Time behaviour	Response time for verification	10	≤ 2 seconds	Load testing
	Resource utilisation	CPU/memory usage during peak operation	5	≤ 75%	System profiling

[93] ISO 25040:2024 Systems and software engineering — Systems and software Quality Requirements and Evaluation (SQuaRE) — Quality evaluation framework, 2024, https://www.iso.org/standard/83467.html

Compatibility	Co-existence	Interference with other systems	5	No observable impact	Integration testing
	Interoperability	% of APIs successfully integrated	10	≥ 95%	API testing
Interaction Capability	Ease of use	Average usability score	10	≥ 85%	User surveys, usability testing
	Inclusivity	% of users achieving tasks	5	≥ 90%	Accessibility testing
	Engagement	User satisfaction score	5	≥ 80%	User feedback surveys
Reliability	Maturity	Mean Time Between Failures (MTBF)	10	≥ 1,000 hours	System monitoring
	Fault tolerance	% of fault recovery scenarios passed	10	≥ 95%	Fault injection testing
Security	Confidentiality	% of encryption protocols passing tests	15	≥ 99.9%	Security testing
	Integrity	% of transactions with no data corruption	10	≥ 99%	Data integrity checks
	Accountability	% of audit trails complete	10	≥ 98%	Audit trail analysis
Flexibility	Scalability	Performance with 10x traffic increase	10	No more than 20% degradation	Stress testing

	Adaptability	% of environments supported	10	≥ 90%	Compatibility testing
	Configurability	Time to update configurations	5	≤ 30 minutes	Configuration testing

Table 2 The AATT Evaluation Criteria

4.5 Test Approach

Step 1: Practice Statements

The test approach begins with the 'functional claim' provided by the participating age assuring provider, relying party (that deploys age assurance on their online service) or intermediary (which provides functions to support the age assurance process). This claim will be set out in their **practice statement**[94]**,** which is the documentation of the practices, procedures and controls employed by an organization to fulfil a service. It will include information about how their system works and how it fulfils the evaluation criteria. Assessing the practice statement will lead to the identification of the key areas to test as described in Step 2 below. Information expected to be provided in the practice statement includes (but is not limited to):

1) Age eligibility requirements: which age-related eligibility requirements the system supports.
2) Age assurance components: which age assurance components (e.g. kinds of age verification, age estimation and/or age inference) are used by the system.
3) Binding process: how the system undertakes binding of the age assurance result to the correct individual.
4) Privacy and data protection: how the age assurance provider approaches protecting the privacy of users, including the data protection laws and obligations
5) Ease of use: how the system offers functionality appropriate to the capacity and age of a child or adult, up to and including those of retirement age, who may use the service.
6) Security: how the system addresses security requirements, including secure-by-design principles
7) Human rights protections: the extent to which the system is accessible and inclusive to users, does not unduly restrict access of users who should have access and provides sufficient and meaningful information for a user to understand its operation.

[94] Clause 3.1.13, ISO DIS 27566-1:2025 Age assurance systems – Part 1: Framework

Step 2: Evaluation Process

Assessing the practice statement will lead to the identification of the areas that require evaluation. Using the ISO 29119 Software Testing series, the evaluation process will focus on the following two test levels[95] to structure the test activities required:

- system testing
- acceptance testing

to structure the test activities required. The high-level test types are set out as follows. Detailed, low-level test designs will be created as part of the evaluation activities in Work Package 4.

Automated[96] functional testing[97] will be used to evaluate the accuracy of each participating technology. Where feasible, functional tests will include coverage of presentation attack detection features based on ISO/IEC 30107.

Automated non-functional testing[98] will focus on core quality attributes such as minimisation of bias and reliability.

Automated testing will consist of the following steps, described in further in the next section of this report:

1. Gather inputs e.g., the test dataset,
2. Set up communications between the test lab and the system being tested i.e. target of evaluation,
3. Conduct the tests i.e. construct and perform API calls to the system being tested,
4. Record the results of testing.

Manual[99] usability[100] and acceptance testing[101] will be used to cover features which are not suitable for automation.

Manual functional testing will be used to test the **interoperability[102]** aspects of each technology by a combination of manual tests, such as to confirm that a given technology works on various device platforms. This will also cover the **interoperability of parental consent and parental control systems.** In addition to typical manual functional testing, this will involve the creation of artificial accounts known as 'avatars' where required, for example on mobile device operating systems.

[95] Clause 4.2.4.2, ISO 29119-1:2022 Software testing - Part 1: General concepts
[96] Clause 4.4.7, ISO 29119-1:2022 Software testing – Part 1: General concepts
[97] Annex A.2.5, ISO 29119-4:2021 Software testing – Part 4: Test Techniques
[98] A list of non-functional testing types is set out in Figure 2, Clause 4.2.5, ISO 29119-1:2022 Software testing – Part 1: General concepts
[99] Clause 4.4.7, ISO 29119-1:2022 Software testing – Part 1: General concepts
[100] Annex A.2.15, ISO 29119-4:2021 Software testing – Part 4: Test Techniques
[101] Clause 4.2.4.2, ISO 29119-1:2022 Software testing – Part 1: General concepts
[102] Interoperability testing is described further in Annex A.2.7, ISO 29119-4:2021 Software testing – Part 4: Test Techniques

Static reviews[103] will focus on evaluation of features relating to privacy, data security, compliance with human rights requirements and technology readiness assessment. It will also cover these requirements for **parental consent and parental control systems.** Dynamic testing of these features for each participating technology is beyond the scope of the current trial, however dynamic testing of these features is recommended for any technology being deployed.

Deployments of AA, Parental Consent and Parental Control systems on online services will be tested using a blend of the appropriate test approaches listed above, depending on the criteria to test and type of system deployed.

Figure 2 provides an overview of the overall test approach.

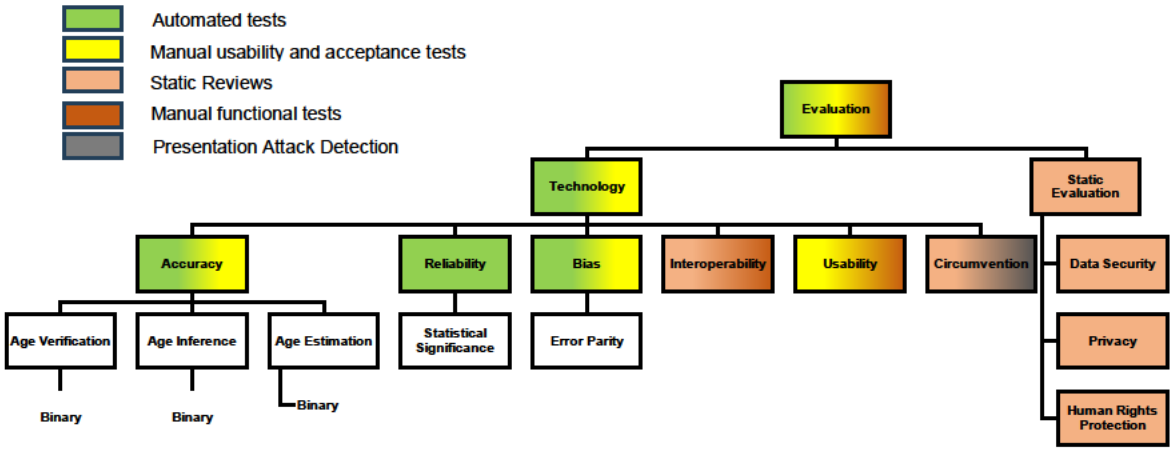

Figure 2: Test approach overview

Figure 3 summarises the application of test activities to relevant effectiveness/quality criteria. For many criteria, two test approaches are applicable and will be used, but one will be considered primary and the other secondary. A test approach is considered primary if it is better suited to fully test the criterion. Choices for primary and secondary approaches are described as follows:

- Accuracy: manual usability & acceptance tests can be used to assess accuracy; however manual testing limits the breadth and depth of coverage in terms of the total number of tests and the number of subgroup divisions of participants that can be tested. Automated testing significantly increases the test coverage which can be achieved; therefore, this will be used to test accuracy.
- Interoperability: static reviews can describe theoretical analysis gained from reviewing technical specifications, but manual functional tests will provide more meaningful results from live testing.

[103] Clause 4.1.5, ISO 29119-1:2022 Software testing – Part 1: General concepts

- Ease of use: static reviews can describe theoretical analysis, but manual usability & acceptance tests will provide more meaningful results from live testing with users.
- Minimisation of bias: manual usability & acceptance tests can be used to assess accuracy, which can then be investigated for any variance amongst subpopulations. However manual testing limits the breadth and depth of coverage in terms of the total number of tests and the number of subgroup divisions of participants that can be tested. Automated testing significantly increases the test coverage which can be achieved; therefore, this will be used to test minimisation of bias.
- Circumvention: static reviews can describe theoretical analysis, but presentation attack detection tests will provide more meaningful results from live testing of age assurance systems.

Each high-level test type is described in the following sub-sections.

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

✓ = Primary O = Secondary

Figure 3: Effectiveness/Quality criteria test coverage

4.5.1 Automated Testing

Functional & Non-functional

The focus for this aspect of testing will be to confirm that key features of each age assurance technology in scope functions accurately, reliably, minimises bias and is acceptably resilient to presentation attacks when used with the expected Australian usage conditions.

Test automation allows for many tests to be conducted consistently across a range of input data and age assurance systems. This allows for assessment of the accuracy of each system when used in a variety of expected usage conditions by a range of different users from different demographics

groups. In this way, reliability and minimisation of bias can also be assessed. The key evaluation metrics for these tests will be:

- False Positive Rate (FPR),
- False Negative Rate (FNR),
- True Positive Rate (TPR),
- True Negative Rate (TNR),
- Classification Accuracy,
- Outcome Error Parity (OEP).

Important considerations:

- It is only possible to perform automated testing of AA services that can be communicated with via an application programming interface (API) or through a software development kit (SDK).
- Ideally, the AA system would be deployed in the test lab, rather than hosted by the provider. This allows observing the AA system in the controlled environment of the lab. However, installation of the AA system in a self-contained environment may not always be feasible.
    - In the case where the AA system is not deployed in the test lab i.e. it is hosted on external infrastructure such as a cloud service, the test data will leave the perimeter of control of the test lab during the tests. This presents a risk to the project as providers may then train their system on the test data. We must, therefore, enter into a legal agreement with providers that ensures that they will not record and/or store the test data during or after the testing process.
- It is also possible to perform automated testing with the AA system hosted by the provider in their environment. The provider will need provide access from our test lab via an API.
- If AA system is unable to provide suitable interface for automated testing, evaluation may be limited to manual testing and static reviews. This may restrict the ability to properly assess key aspects such as reliability and minimisation of bias, which require many repeated tests.
- Suitable test data is a key requirement for automated testing[104]. This is discussed in more detail in section 4.5.10.
- Techniques such as the use of the Fitzpatrick Scale[105] of skin tones will be used for designing the dataset to sufficiently perform bias testing.
- Generally, each kind of age assurance system will require different test data as follows:

[104] A-1.1.2 Ethical Data Collection Protocol sets out further detail on data minimisation and the categories of data that the AATT will collect.

[105] Fitzpatrick TB. The validity and practicality of sun-reactive skin types I through VI. Arch Dermatol. 1988 Jun;124(6):869-71. [PubMed]

(1) Age Verification: test data will include samples of the verified date of birth (e.g. images of identity documents held by the participant and images of the user that bind them to the identity document) that enables calculating the user's age from that date to the current date.
(2) Age Estimation: test data will include samples of the biological information (e.g. images of the face, audio recording of the voice, video recording of hand gestures or gait, etc.) or behavioural information (e.g. typing patterns, etc.) that vary with age.
(3) Age Inference: test data will include samples of the verified information (e.g. credit card details, etc.) that indirectly implies the individual is over or under a certain age.

4.5.2 Automated testing process

The overall process that will be run for the automated testing of each age assurance system:

1) Gather inputs – create and prepare the test dataset for testing in line with the trial's ethical data collection protocol[106]. Test datasets could include photos, videos, audio files. They will also include demographic information including but not limited to ground truth age, gender, ethnicity, skin tone. Specific data variables for the datasets will be required for each age assurance method – these will be defined once participating providers are confirmed. Example of such data variables include images of photo IDs, sensor quality, image lighting, etc. Test data preparation will include modification of input data to simulate expected usage conditions (e.g. low light, poor quality image capture).
2) Set-up & establish communications between test lab and AA system. This may involve deploying the AA system in the test lab and/or implementing API communications functionality on the AA system.
3) Conduct the tests by constructing & performing API calls to the AA system.
4) Record results of testing, including:
   a) Age output from the AA system.
   b) Time taken to output result.
   c) Data and metadata captured by the AA system.

4.5.3 Presentation Attack Detection

Functional testing will include specific testing of each system's ability to resist circumvention or perform "Presentation Attack Detection" (PAD), including:

1) Presentation attacks: where, for voice age estimation systems as an example, the individual plays a pre-recorded audio clip performed by an adult.

[106] See A-1.1.2 Ethical Data Collection Protocol.

2) Spoofing attack: when an individual is attempting to try to fool the age estimation method, e.g., by trying to look older than they really are while wearing a hat, glasses, a fake beard or a fake moustache.

The key difference is that spoofing attacks involve the actual presence of the individual, but some aspect of their presence is manipulated to deceive the system (e.g., wearing a mask or using altered facial features). In contrast, presentation attacks involve using an external object or "payload," such as a photo, video or fake fingerprint, that does not represent the individual directly.

It is not feasible to physically test (using PAD) all circumvention methods for all AA systems, due to the project's timeline and available resources. Therefore, we will take a risk-based approach, selecting the highest impact circumvention methods per AA method to test**.** As outlined below, we have defined "highest impact" as those methods which are most readily available, according to factors such as the cost and technical literacy required to perform the attack. PAD will be supplemented by on-paper evaluation of circumvention of each AA method that goes beyond the current state-of-the-art as per recent studies[107] [108].

The ISO/IEC 30107 Biometric Presentation Attack Detection series does not categorise different kinds of attacks. It allows testing bodies to define custom categorisation of attacks. This recognises the fact that different kinds of attacks may require different test protocols and resources. Furthermore, the kinds of attacks will develop over time, so providing a categorisation of attacks aids in developing uniform test strategies to cover each category.

There is no consensus or agreed standard for categories of presentation attacks. Two examples of categories include the iBeta Quality Assurance[109] presentation attack detection levels and the FIDO Alliance's spoof presentation attack levels[110]. They differ in the number of levels they define; iBeta define 2 levels whereas FIDO Alliance define 3 levels. But they use the same criteria to categorise, which include the time, expertise and resources required to perform a presentation attack. We will therefore use the same criteria.

The evaluation will include circumvention testing leveraging the extensive experience of the ACCS from its auditing of national identity schemes. The report will note where a solution has had independent testing on its circumvention detection (eg under ISO 30107-3).

[107] M. Sas and J. T. Mühlberg, "Trustworthy Age Assurance?" The Greens Cluster: Social & Economy. In The European Parliament., 2024.
[108] M. R. Shaffique and S. van der Hof, "Research report: Mapping age assurance typologies and requirements.," Directorate-General for Communications Networks, Content and Technology, Better Internet for Kids (BIK), European Commission, 2024.
[109] https://www.ibeta.com/iso-30107-3-presentation-attack-detection-confirmation-letters/
[110] Appendix A, https://fidoalliance.org/specs/biometric/requirements/Biometrics-Requirements-v4.0.1-fd-20240522.html#TriagePAD

The circumvention evaluation will aim to assess the extent to which each age assurance technology is vulnerable to Presentation and Injection Attacks that children in Australia are considered likely to be able to use today. The team will use tools and techniques that are publicly available via the internet and on smartphone devices, including paid-for tools, and it shall research fraud methods publicised on social media sites. The testing team will necessarily employ a risk-based approach to its circumvention testing but is confident that this approach will ensure that the testing team can report on the effectiveness of each tested solution.

Within this framework, circumvention criteria will explicitly assess resistance to AI-driven threats such as deepfakes and synthetic media. Liveness detection techniques will be tested for effectiveness against AI-generated manipulations. We will also design and implement adversarial scenarios to simulate real-world attacks. This will position the evaluation to address emerging risks effectively. We recognise the speed of development of AI and deepfake technologies and note that all approaches will need to monitor for new attacks and continuously develop defences against them.

The specific presentation attacks to test are dependent on the age assurance method being tested. Therefore, they will be defined along with the associated test protocols when the participating providers have been confirmed.

4.5.4 Usability and Acceptance testing

Overall Approach

Manual usability and acceptance testing will involve constructing a digital survey that requires mystery shoppers/users[111] , i.e. usability and acceptance (UA) testers, to undertake age checks by a subset of AA systems. UA testers will answer usability questions about each system after completing its age check. To avoid overburdening UA testers, only a subset of AA systems will be tested by each person, up to a maximum of 6. This is because each person will only be able to complete a small number of AA checks before experiencing fatigue. This could lead to abandonment of the process or negatively biased evaluations of systems tested later in the sequence.

Figure 4 on the following page shows the user journey for one participant completing the maximum of 6 AA checks.

[111] See Section 6.4 Call for Participation for further details.

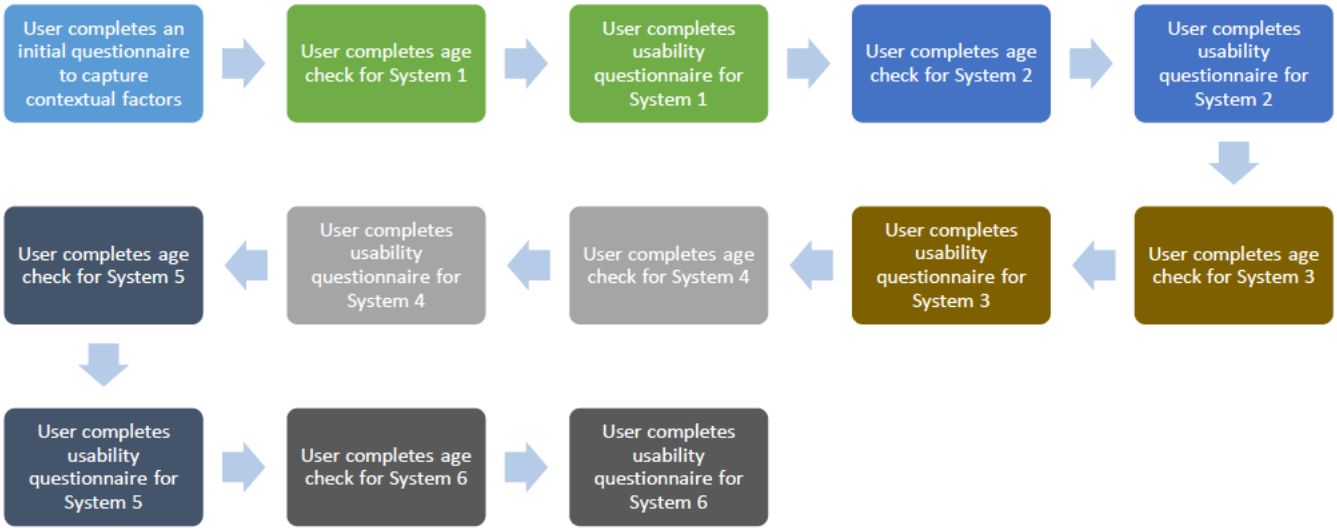

Figure 4: User journey for digital survey used for usability and acceptance testing

There are three approaches proposed:

A. In-person focus groups.
This method is where participants travel into the test lab to undertake the usability and acceptance tests whilst being observed by the host. As it is observed, it is a more reliable method. It is challenging for UA testers to travel into the test lab, particularly those from minority subpopulations, therefore the total number of participants in this case would be smaller than other approaches.

B. Remote.
This method is where participants are provided an online survey to complete remotely. It allows for a larger number of participants to be reached more easily than with in-person testing. It is possible to obtain a statistically significant sample size that is representative of the Australian population, as defined in Section 4.5.10. However, this approach is less reliable as it is not observed so participants could, for example, rush it through. Mitigation techniques for this can be employed, such as keeping track of time and discouraging rushed responses. Another challenge is that producing the remote survey that integrates with several age assurance systems and directs each user through the subset of systems assigned to them is a challenging and lengthy task, which we estimate will take approximately 2 months.

C. Hybrid observation.
This method involves gathering participants into focus groups that are run via online conferencing software. Each participant is provided an online survey, but the observer guides the focus group participants through the user journey, asking usability questions and recording the responses. This option allows for more participants than the in-person approach and it may be possible to obtain a statistically significant sample size that is

representative, as defined in Section 4.5.10. This approach also leads to greater reliability in the results when compared with the remote option, as it will include human observation.

The detailed design of UA testing will be specified during the early stages of Work Package 4 "Evaluation Activity", guided by the approaches set out above. However, we provide below the evaluation criteria to assess usability and provide an example of the questionnaire to be used during testing.

4.5.5 Usability and Acceptance criteria and questionnaire design

ISO 9241-11:2018 Ergonomics of human-system interaction — Part 11: Usability: Definitions and concepts defines several criteria that can be used the trial to assess ease of use. These can be used to inform the questionnaire that users will complete after each age check.

Key criteria for ease of use include:

- Satisfaction: the extent to which the user's physical, cognitive and emotional responses that result from the use of a system, product or service meet the user's needs and expectations
- Effectiveness: the accuracy and completeness with which users achieve specified goals.
    - Note that this is how 'effectiveness' is defined under ISO 9241 and its context of human-system interaction. This is distinct from the 'overall' effectiveness of age assurance systems, which is considered to mean how well the technology performs against several relevant criteria as defined in Section 4.3.3 Evaluation Criteria.
    - Note also that we will capture the accuracy of the age check as part of the UA testing, but this is the secondary test approach for assessing accuracy rather than primary. The primary test approach for assessing accuracy is Automated Functional Testing as described in Section 4.5.1.
- Efficiency: resources used in relation to the results achieved

To assess these criteria, a draft questionnaire with five questions along with their range of possible answers is included below. For each question, the factor being assessed is also stated.

1. [Effectiveness] Were you able to complete the age check?
    a. Yes, without any issues
    b. Yes, but with some issues
    c. No
2. [Efficiency] How would you rate the amount of effort needed to complete the age check?
    a. Likert scale: 1 (Too Much Effort) to 5 (Minimal Effort)
3. [Efficiency] How would you describe the time it took to complete the age check?
    a. Quicker than expected
    b. Roughly as expected
    c. Longer than expected
4. [Satisfaction] How confident did you feel in your ability to use the age assurance system to complete the age check?
    a. Likert scale: 1 (Not Confident) to 5 (Very Confident)
5. [Satisfaction] How would you rate your overall experience using the age assurance system?
    a. Likert scale: 1 (Very Dissatisfied) to 5 (Very Satisfied)

4.5.6 Manual Functional Testing: Interoperability testing

Using manual functional tests, the interoperability criteria we plan to evaluate for an AA system include:

- Which devices are supported?
- Which operating systems are supported?
- Which browsers are supported?
- Which interoperability standards are supported?
- Which interoperability and reusability approaches does the system implement (e.g. age tokens)?
- With which online services does the AA system's interoperability mechanism work currently?

This information can be provided directly from the age assurance provider via issuing them a survey, which can then be assessed and validated with manual functional tests.

Comprehensive testing (of all devices/OS/software) is not feasible for this trial due to the timeline and available resources.

4.5.7 Manual Functional Testing: Avatar tests for Parental Consent and Parental Controls

Parental consent and parental control systems are unlikely to support automated testing, as they are primarily driven by user interfaces. These systems will be tested using a type of manual functional test, 'avatar tests.' An avatar is an artificial identity, which in this case will be created as an artificial account on an online service or a device or operating system, to test specific functions.

The manual functional testing of these systems will cover the **interoperability** criterion. The testing of example systems, such as Android or iOS family accounts, will include for example:

- Which devices are supported?
- Which operating systems are supported?
- Which functions of the digital service can be restricted?
- Does the system integrate with other digital services (e.g. app stores or online services like social media apps)? If yes, which ones?
- What kind of restrictions can be put in place, both on the digital service itself and any other services it integrates with?
    - Which are default and which are opt-in?
    - How granular are they?
    - Can they be calibrated for children's evolving capacities as they mature
- How can restrictions be removed?
- What monitoring information is provided to the parent/guardian and the child?

During the trial, we will create two avatars on each parental consent and parental control system in-scope. One avatar will represent a child user and one will represent its parent/guardian. After creation, they will be linked together as parent and child on the digital service. Then, the restrictions available for application by the parent account, both on the digital service and any

integrated online services, will be explored and applied. Each restriction will then be tested by using the child account.

4.5.8 Static reviews

Static reviews will be used to evaluate the suitability of AA systems in terms of how well their features support the following qualities in the context of usage in Australia.

The quality criteria and the specific factors to evaluate under each of them, are described as follows:

1) **Protection of privacy:** how well the technology protects users' personal information, including through following data minimisation practices both in the capture of information from the user and the sharing of information with the relying party. We recognise that privacy is a key concern for users and a variety of stakeholders and that the assessment of privacy protection is a considerably complex task. It is not feasible to perform a comprehensive privacy assessment in this trial, therefore we will take a cautious approach to the assessment of privacy which shall be informed by the following considerations:
   a) Privacy factors can be assessed from manually gathering information, such as the privacy policy and data required from the user, from the age assurance provider.
   b) Some key privacy factors associated with age assurance systems are defined in the ISO 27566-1 Age Assurance Standards – Framework, Clause 8:
      i) Data minimization
         (1) Collection limitation
         (2) Non-disclosure of age-related data:
         (3) Compliance with legal obligations
         (4) Purpose limitation
         (5) Access control
      ii) Data disposal
      iii) Avoidance of adding to digital footprint
      iv) User awareness
      v) Audit Logs
   c) Importantly, we will also use the Australian Privacy Principles[112], as far as is feasible, for the assessment in-scope systems. We will focus on the following principles:
      i) Open and transparent management of personal information (APP 1)
      ii) Anonymity and pseudonymity (APP 2)
      iii) Collection practices, including data minimisation (APP 3)
      iv) Notification of the collection of personal information (APP 5)
      v) Use or disclosure of personal information, including the use of personal information for purposes other than age assurance (APP 6)
      vi) Consent, including the higher standards that apply to any collection, use or disclosure of sensitive information (APP 3 and APP 6)

[112] Office of the Australian Information Commissioner, "Australian Privacy Principles", 2022, Available: https://www.oaic.gov.au/privacy/australian-privacy-principles/read-the-australian-privacy-principles

vii) Limitations around direct marketing (APP 7)
viii) Cross-border disclosure of personal information (APP 8)
ix) Use of government related identifiers (APP 9)
x) Quality of personal information (APP 10)
xi) Security of personal information (APP 11)

2) **Human rights protections**: In addition to privacy, the extent to which the age assurance is accessible for all users to evaluate potential impact on freedom of expression. In addition, an assessment of efforts that have been made to respect other relevant fundamental rights, including children's rights as set out in the *UN Convention on the Rights of the Child.* Human rights protections can be assessed from gathering information, such as operating procedures and system requirements, from the age assurance provider. Key factors include:
   a) The percentage of the Australian population that hold the necessary documentation required by the age assurance system e.g. holders of valid passport or driving license,
   b) Efforts that have been taken to make the age assurance system to internet users with particular needs,
   c) Which languages the age assurance system supports,
   d) The complexity of the age assurance process and the availability of transparent information for users.
3) **Data security**: if user data is stored and, if so, if it is secure and or de-identified. Data security factors can be assessed from gathering information, such as security policies and certifications, from the age assurance provider. Key factors are defined in the ISO 27566-1 Age Assurance Standards – Framework, Clause 9:
   a) Security by design and default – which may be demonstrated by security certifications such as ISO 270001 or IRAP assessments aligned to the ASD Information Security Manual.
   b) Freshness, Reuse and Forwarding of age assurance result
      i) Freshness of an age assurance result: An age assurance result shall be protected from unplanned reuse.
      ii) Forwarding of an age assurance result: An age assurance result shall be protected from unplanned forwarding to a third party.
      iii) Planned memorization or reuse of an age assurance result: An age assurance provider or a relying party may provide for the planned memorization or reuse of an age assurance result.
4) **Technology Readiness Level (TRL):** The AATT will use the TRL calculator provided by The New South Wales Government[113], which divides the TRL into 3 factors: technology, product development and product definition/design.

Static reviews: Step-by-step process

- Step 1: Desk research to gather necessary inputs for the evaluation including: academic literature, industry literature and documents from providers (e.g. system requirements, privacy policy, etc.).
- Step 2: Analyse the method against the specific characteristics/criteria using the inputs.
- Step 3: Record the results of analysis against the characteristics/criteria.

[113] https://www.investment.nsw.gov.au/assets/Grants-and-rebates/MVP-Technology-Readiness-Level-Tool.xlsx

4.5.9 Deployments of in-scope systems across the Tech Stack

Age assurance, parental consent and parental control systems may be deployed at various points on the tech stack i.e. key points on the user journey from first accessing the device to finally accessing a piece of content.

The key points on the tech stack are:

1) Device and Operating System
2) Optionally, App Store
3) Network Access (ISP or Mobile Network Operator)
4) Optionally, Search service
5) Online Service:
    a) App or
    b) Website or
6) Optionally, User Account
7) Content

The effectiveness of an age assurance, parental consent and parental control system may vary in accordance with the point at which it is deployed on the tech stack.

The testing of systems on different points on the tech stack will be conducted either:

- Using static evaluation, if at a particular point on the tech stack there no live deployments in practice or none participate in the trial,
- Using a blend of test approaches described above if a live deployment exists and participates in the trial. The blend of test approaches will depend on the type of system to test and the criteria to test, as described earlier in this report.

4.5.10 General data requirements

To ensure an ethical approach to data gathering, incorporating privacy and human rights protections, the protocols set out in various Work Package 1 deliverables associated with the following activities will be followed:

- A-1.1.2 Approach to privacy impact assessment
- A-1.1.3 Data collection ethical protocol

These are described further in Section 7 below.

In designing an evaluation proposal for sampling age groups and sub-population demographics, our approach prioritises achieving statistical significance while managing the project's cost-effectiveness. The desired statistical validity directly influences the number of trial participants required to ensure confidence in key evaluation measures, such as classification accuracy (e.g., false accept rate, false reject rate, failure to acquire rate), binding accuracy (linking the age assurance output to the correct individual), and outcome error parity (minimizing bias across demographic groups).

Using Australia's population of 26 million as a baseline, we propose an initial sample size calculation based on a confidence interval of 95% (Z-score = 1.96) and a margin of error of 0.03. Using the Sample Size Calculator provided by Australian Bureau of Statistics[114], this results in a minimum sample size of approximately 1067 participants for population-wide analysis. For specific sub-population categories, such as age or demographic groups, we propose a slightly wider margin of error of 0.05, which reduces the required sample size to 384 participants per subgroup.

In our proposed approach, we start by calculating the overall sample size required for population-wide analysis using standard statistical methods. With a 95% confidence interval (corresponding to a Z-score of 1.96), we ensure that the evaluation results have a high degree of reliability, meaning there is only a 5% chance that the true results fall outside the calculated range. The margin of error represents the acceptable level of uncertainty in the results. By setting this margin at 0.03 (or 3%), we limit the range of potential deviation in the population-wide evaluation metrics. These parameters lead to a required sample size of 1067 participants for the entire population. This ensures that the analysis can support robust conclusions about age assurance system performance across Australia.

For sub-population categories, such as specific age brackets (e.g., 10–12, 13–15) or demographic groups (e.g., Aboriginal and Torres Strait Islander peoples), we adjust the sampling approach to account for the practical challenges of recruiting participants. By applying a wider margin of error of 0.05 (or 5%), the required sample size decreases to approximately 384 participants per subgroup. While this slightly increases uncertainty, it still provides a statistically meaningful representation of these sub-populations, allowing for balanced insights while optimizing resource use. This flexible, stratified approach ensures representational fairness and cost-efficiency, aligning with project goals.

Recruiting sufficiently large sample sizes, such as 1067 participants for population-wide analysis or 384 participants for each sub-population, requires a strategic and multi-faceted approach to ensure representational fairness, feasibility, and cost-effectiveness. Our approach to addressing this challenge includes:

1. **Partnering with Community Organizations and Stakeholders**
   Collaborations with community organizations, schools, universities, and advocacy groups can provide access to diverse populations, including hard-to-reach subgroups such as Aboriginal and Torres Strait Islander peoples or specific age brackets (e.g., 10–12, 13–15). These organizations often have established relationships and trust within their communities, facilitating recruitment.

2. **Leveraging Digital and Social Media Platforms**
   Digital platforms allow for targeted outreach campaigns to recruit participants. Tools such as social media advertising, email outreach, and recruitment websites can be tailored to

[114] Australian Bureau of Statistics, "Sample Size Calculator", 2024, Available: https://www.abs.gov.au/websitedbs/D3310114.nsf/home/Sample+Size+Calculator

demographics based on age, location, and other factors. Incentives, such as vouchers or compensation, can encourage participation.

3. **Using Existing Databases and Networks**
   Where ethically permissible, we would leverage existing participant databases from prior research or studies. Partnering with institutions such as research councils, market research firms, or governmental organizations can provide access to pre-screened participants who meet the study's demographic requirements.
4. **Implementing a Tiered Recruitment Strategy**
   To ensure proportional representation while managing recruitment efforts, we would use a tiered approach:
   a. **General Population Sampling**: Focus recruitment efforts broadly across urban and rural areas using random sampling techniques.
   b. **Sub-Population Sampling**: Employ stratified sampling to ensure specific subgroups are represented adequately, focusing additional efforts on minority or underrepresented populations.
5. **Offering Flexible Participation Options**
   Providing participants with flexibility in how they engage with the study can increase recruitment rates. For instance, participants could be involved through in-person assessments, online platforms, or mobile app interactions, depending on their preferences and the study's logistical constraints.
6. **Collaborating with Educational Institutions**
   Schools and universities are excellent sources for recruiting participants in specific age groups, particularly younger demographics. Engaging with parent-teacher associations, student organizations, and academic networks can streamline recruitment for youth participants.
7. **Conducting Localised Outreach Campaigns**
   Localised campaigns in areas with high population densities or target demographics can help meet recruitment goals. Advertising in local newspapers, radio stations, or community boards can generate interest and reach specific groups effectively.
8. **Employing Incentives and Rewards**
   To motivate participation, we would offer incentives such as gift cards, charitable donations on behalf of participants, or small cash payments. Clear communication about the purpose of the study and its benefits to the community or society can further encourage engagement.

9. **Monitoring Recruitment Progress**

Recruitment will be closely monitored to ensure quotas for both overall and sub-population samples are met. Adjustments, such as increasing outreach efforts in underrepresented areas, will be made as needed to balance demographic representation

As a guiding principle for the test dataset design, we are aiming for a margin of error of 3% across the entire Australian population and wider 5% margin of error on specific subpopulations where necessary. In practice, we may encounter cases where the margin of error increases beyond 5%. In these cases, the margin of error will be reported together with the associated test results. If the margin of error exceeds 20%, we will not report the results of testing.

4.5.11 Combination of systems & successive validation

Interoperability between systems is already included in the evaluation criteria. To explore the potential advantages of combining multiple age assurance methods, the evaluation framework will also incorporate a dedicated methodology for testing the combinations of age assurance systems. Experimental scenarios will be designed to assess how methods complement one another, either in sequence or in parallel, under laboratory conditions and real-world conditions such as social media registration or accessing restricted content. The analysis will include technical compatibility, operational challenges, and combined system performance metrics, such as accuracy improvement and enhanced user satisfaction.

An important consideration for evaluation of the effectiveness of combined systems is that such systems do not produce a cumulative output i.e. one system's output is not used as an input to the next one in the sequence. One system may trigger another one, for example if an age estimation check assesses that the user is under-25, this may trigger an age verification check. But the under-25 age result is not used as an input to the age verification system.

4.6 Test Environment

4.6.1 Overview

The test environment and all associated testing practices will be set up to follow guidelines, principles and frameworks as specified in the Evaluation Proposal. This includes following the framework in the Information Security Manual (ISM) as produced by the Australian Signals Directorate.

The test environment is described here at a high-level, which will guide the low-level design to be produced as part of Work Package 4 evaluation activities, once it is clear which systems will participate in the AATT.

The trial will ensure that all appropriate measures are taken to ensure privacy and data security, including through conducting Privacy Impact Assessments (PIAs)and following other relevant Work Package 1 protocols.

4.6.2 Hardware/Software Requirements

Infrastructure
The testing environment will be hosted on a secure cloud platform (for example, AWS, Microsoft Azure or Google Cloud). Environments will include isolated and secure network configurations with the use of "Private Clouds". For any on-premises systems, dedicated machines will be housed in restricted access locations with appropriate physical security.

Hardware
Servers or virtual machines with adequate processing power and memory will be used to simulate high-volume tasks, including encryption/decryption operations and data analysis. With the use of cloud-based services, this can be scaled up as necessary at low cost.

Software Platforms
Modern programming languages such as Python and JavaScript will be used to build test infrastructure, as both provide a multitude of reusable testing libraries and are used extensively in the commercial setting. It is expected that a custom-developed test infrastructure may be built on top of these base libraries, to model the concepts specific to AA testing. Environments such as Linux or Docker containers will be used for running the task software. Where required compatibility with vendor-provided APIs or SDKs for testing will be developed.

Security Features
All hardware and software will support end-to-end encryption (TLS), secure authentication protocols (for example, OAuth 2.0) and role-based access control to ensure data integrity.

4.6.3 Test Data

Input Data
Where possible, only anonymized and aggregated data will be used to protect user identities and any Personal Identifiable Information (PII) will be removed or hashed before testing. Where this may not be possible, to determine accurate results, appropriate measures, as set out in A-1.1.3 Data Collection Protocol, will be in place to protect the data.

Data Security
Input and result data will be encrypted both in transit and at rest using modern encryption algorithms. Access to the data will be restricted to authorized personnel and systems only.

Data Retention
A formal data destruction policy will be implemented to ensure all collected input and result data are securely deleted at the conclusion of the trial, including overwriting residual data where applicable.

4.6.4 Test Tools

Test Case Management
Tools such as Atlassian's Jira or OpenText ValueEdge will be used to document, track and manage test cases. Tickets will categorise appropriately and priority levels assigned to case tickets.

Defect Tracking

All defects will be logged and monitored using a dedicated tool such as Jira/ValueEdge. All defects will be categorised by provider and/or by test infrastructure. Defect tracking of participant systems may be important in establishing usability levels and whether the participant system is considered ready. Defects of the testing infrastructure will be managed in a similar way.

Automation
Automated testing tools such as Selenium or Postman will be used for API testing and functional verification. Custom Python scripts will handle repetitive test setups and data preparation tasks.

4.7 Test Design

Once technology trial participants have been confirmed, detailed test plans and test designs will be produced for each of the age assurance mechanisms and parental control and parental consent mechanisms in scope. These plans and test designs will provide specific guidance on how to evaluate each system, following the approach outlined in this test strategy.

Providers will by necessity have some input into the test designs, but this will be kept to a minimum to ensure independence and impartiality of the AATT. The key input to the test designs from providers will be the practice statements described in Section 4.3.5. Test designs can be produced once the functional claim in the practice statement is assessed, to understand how the system works and which areas need testing. There will also be engagement with the provider to set up communications between the test lab and the system to test, however this will not impact evaluation results under any of the evaluation criteria.

4.8 Mapping of Relevant Aspects of ISO/IEC 25010

The ISO/IEC 25010 standard, part of the Systems and Software Quality Requirements and Evaluation (SQuaRE) series, provides a robust framework for evaluating software and system quality. This analysis aligns the standard's product quality model with the specific requirements of the Age Assurance Technology Trial (AATT). By integrating ISO/IEC 25010 into the evaluation design, the trial ensures consistency, precision, and adherence to international best practices. This report details how ISO/IEC 25010's nine quality characteristics and sub-characteristics are mapped to the trial's core contexts: accuracy, reliability, interoperability, minimisation of bias, ease of use, privacy protection, data security, and human rights protections.

4.8.1 Quality Characteristics

The ISO/IEC 25010 model categorises product quality into nine high-level characteristics:

1. **Functional Suitability**: Measures how well the software meets stated and implied needs.
2. **Performance Efficiency**: Evaluates system performance regarding responsiveness, resource utilisation, and throughput.
3. **Compatibility**: Focuses on interoperability and co-existence with other systems.
4. **Interaction Capability**: Includes inclusivity, usability, and user engagement.
5. **Reliability**: Ensures stability and fault tolerance during operation.

6. **Security**: Encompasses confidentiality, integrity, and accountability of information.
7. **Maintainability**: Evaluates ease of modification and support over time.
8. **Flexibility**: Covers adaptability, scalability, and configurability.
9. **Safety**: Addresses operational safety, risk management, and fail-safe mechanisms.

4.8.2 Sub-characteristics

Each characteristic is broken into sub-characteristics that provide granular quality dimensions. For example:

- **Functional Suitability**: Functional completeness, correctness, and appropriateness.
- **Security**: Confidentiality, integrity, and non-repudiation.
- **Project Contexts in Use**: The AATT project evaluates systems with unique operational and ethical requirements. These include:
  - **Accuracy**: Precision in verifying user age.
  - **Interoperability**: Seamless integration with diverse platforms and technologies.
  - **Reliability**: Stable operation in varying scenarios.
  - **Ease of Use**: Accessible design for various users, including children or adults up to and including those of retirement age.
  - **Minimisation of Bias**: Avoidance of systemic biases in age verification algorithms.
  - **Privacy Protection**: Ensuring compliance with legal frameworks (e.g., GDPR) and maintaining user trust.
  - **Data Security**: Protecting sensitive information from breaches or misuse.
  - **Human Rights Protections**: Aligning with ethical standards, including child safety online and data minimisation.

4.8.3 Mapping Table

The table aligns ISO/IEC 25010 characteristics and sub-characteristics with project requirements while also mapping to ISO/IEC 25040, IEEE 2089.1, and ISO/IEC 27566-1:

Final Evaluation Criteria	Sub-criteria	Mapping to ISO 25010	Mapping to ISO 25040	Mapping to IEEE 2089.1	Mapping to ISO 27566-1
Accuracy	FPR, FNR, TPR, TNR	Functional correctness	Specification of quality metrics	Accuracy, classification errors	Functional effectiveness
Interoperability	API success rate, data exchange capability	Interoperability	Specification of the evaluation plan	Interoperability	Functional interaction

Reliability	Fault tolerance, MTBF	Reliability	Execution of evaluation tests	Fault recovery	Risk identification
Ease of use	Usability score, accessibility testing	Interaction capability	Quality requirements validation	Accessibility considerations	Interaction inclusivity
Minimisation of bias	Parity analysis, demographic fairness	Interaction capability	Specification of the evaluation plan	Bias mitigation measures	Inclusivity and fairness
Human rights protections	Data minimisation, ethical compliance	Security, flexibility	Evaluation report conclusions	Human rights impact	Ethical protections
Protection of privacy	Encryption, purpose limitation	Security	Specification of quality metrics	Privacy by design	Privacy and confidentiality
Data security	Audit trails, data breach prevention	Security	Execution of evaluation tests	Security effectiveness	Security resilience
Circumvention	Resistance to bypass attempts	Reliability, security	Execution of evaluation tests	System robustness	Functional robustness

4.8.4 Addressing Identified Gaps

- **Minimisation of Bias:** ISO/IEC 25010 lacks explicit provisions. IEEE P7000 standards and custom metrics for fairness analysis can be applied to mitigate this.
- **Ethical Considerations:** Augment with frameworks addressing human rights and ethical design, as described above in Section 4.5.8.

4.9 Test Execution

The initial general approach to test execution, followed by the kinds of reports that will be produced to ensure sufficiency of an audit trail, is defined below. The approach is divided into the different kinds of tests and the different systems under test. These will be refined further during the beginning of the testing process.

4.9.1 Automated Tests

1. Entry and Exit Criteria: Define conditions for starting and stopping tests.
    a. Entry criteria:
        i. Dataset gathered.
        ii. Test environment ready – system to test is either deployed in the test lab or accessible from it.
        iii. Test scripts created and tested.
    b. Exit criteria:
        i. The age check completes successfully.
        ii. A classification of the user's age being equal to and above or below, each threshold is produced. The thresholds are 13+, 16+ and 18+
        iii. Metadata of the test is also recorded.
2. Execution Plan: Schedule testing activities.
    a. Timeline (this is subject to change):
        i. Age Verification systems to be tested first in M3 (January) and M4 (February).
        ii. Then Age Estimation systems to be tested in M4 (February) and M5 (March).
        iii. Then Age Inference systems to be tested in M5 (March) and M6 (April).

4.8.2 Manual usability and acceptance testing

1. Entry and Exit Criteria:
    a. Entry Criteria:
        i. Participants recruited and assigned a maximum of 6 AA systems per participant.
        ii. Test environment ready – the survey, including integration with each AA system and the build of all questionnaires, is deployed and tested. This will require the team members leading evaluation activity and the user participants to have the necessary access to the AA systems to test.
    b. Exit Criteria:
        i. The survey, including all age checks, completes successfully.
        ii. A classification of the user's age being equal to and above or below, each threshold is produced. The thresholds are 13+, 16+ and 18+
        iii. The user input to all questionnaires has been recorded.

2. Execution Plan (this is subject to change):
    a. Testing of all participating age assurance systems to be conducted between M3 (January) and M6 (April)

4.9.3 Manual functional testing

1. Entry and Exit Criteria:
    a. Entry Criteria:
        i. Any avatars required are created.
        ii. Test environment ready – the age assurance or parental consent or parental control system is either deployed in the test lab or accessible from it via a user-interface.
        iii. Any other online services to test for interoperability are accessible from the test lab.
    b. Exit Criteria:
        i. For age assurance systems:
            1. A classification of the user's age being equal to and above or below, each threshold is produced. The thresholds are 13+, 16+ and 18+.
            2. The result of successfully performing the age check on a service is recorded, along with any metadata.
        ii. For parental consent and parental control systems, the result of the restriction being tested on the host digital service or another integrated online service is recorded, along with any metadata.
2. Execution Plan (this is subject to change):
    a. Testing of all participating age assurance systems to be conducted between M3 (January) and M6 (April)
    b. Testing of all participating parental consent and parental control systems to be conducted between M4 (February) and M6 (April)

4.9.4 Presentation Attack Detection

1. Entry and Exit Criteria: Define conditions for starting and stopping tests.
    a. Entry Criteria:
        i. Dataset gathered and/or avatars created if required for the test.
        ii. Test environment ready – system to test is either deployed in the test lab or accessible from it.
        iii. Test scripts created and tested if required for the test.
    b. Exit Criteria:
        i. System produces an output indicating either
            1. Attack detected or
            2. The user's age (i.e. attack not detected).

2. Execution Plan (this is subject to change):
    a. Testing of all participating age assurance systems to be conducted between M3 (January) and M6 (April)
    b. Testing of all participating parental consent and parental control systems to be conducted between M4 (February) and M6 (April)

4.9.5 Static Evaluation

1. Entry and Exit Criteria: Define conditions for starting and stopping tests.
    a. Entry Criteria:
        i. Literature gathered, including practice statements from participating providers, academic sources and industry sources.
    b. Exit Criteria:
        i. Result of static evaluation recorded per criteria.
2. Execution Plan (this is subject to change):
    a. Testing of all participating age assurance systems to be conducted between M3 (January) and M6 (April)
    b. Testing of all participating parental consent and parental control systems to be conducted between M4 (February) and M6 (April)

4.9.6 Defect Management

For all the above kinds of tests, defect management will be handled by a Defect Management Policy to be defined at the beginning of the evaluation activity in Work Package 4. This will outline the process for reporting, triaging and resolving defects, including the following steps:

1. Defect to be created in management system (such as JIRA).
2. Mandatory fields and attributes filled in by reporter.
3. All new tickets to be triaged and prioritised by selected Defect Triage Lead.
4. Triage Lead re-assigns to appropriate party for fixing.
5. Evaluation Trial Manager to be notified and defect tracked.

4.9.7 Test Reports

Using ISO 29119-3:2021 Software testing – Part 3: test documentation, we intend to produce the following documentation for the testing process:

- Test completion report: this provides a summary of the testing that was performed.
- Test Results: a record of whether a specific test case has passed or failed; i.e. if the actual results correspond to the expected results or if deviations were observed or if planned execution of the test case was not possible.
- Test Incident Report: a test incident is any issue that is noticed during testing that requires investigation, such as when an actual result deviates from the expected result of a test or

when the system behaves differently to how a tester expected. Test incidents are recorded in test incident reports. There will be one incident report for each unique incident (incident reports may also be known as defect reports, bug reports, fault reports, etc.).

- Test execution log: this records details of the execution of one or more test procedures as a series of events.

All these reports collectively provide a transparent, traceable record of testing throughout the project. They ensure:

1. Traceability: Every test result can be linked back to specific test cases, procedures and data.
2. Accountability: Issues related to data, including anomalies or changes, are documented.
3. Reproducibility: Future testers can replicate results using the same data and procedures.
4. Compliance: Documentation for test designs, processes, implementation and results demonstrate adherence to standards.

These reports will provide the final project report with a clear audit trial, ensuring confidence in the results.

4.10 Test Governance

Roles and Responsibilities: The RACI matrix for all team members associated with test activities are defined in Figure 5 below.

Role	Stakeholder	Test Age Verification	Test Age Estimation	Test Age Inference	Test Parental Consent and Parental Controls	Test Tech Stack & TRLs
Test Lead	Adrian Ugray	I	R	I	I	R
Test Lead	Jason Smart	R	I	I	I	I
Test Lead	Jonathon Cleaver	R	R	I	I	I
Test Lead	Ji Yu Jan	I	R	R	I	I
Test Lead	Seung Roh	I		I	I	I
Test Lead	Stan Potums	I	R	R	I	I
Test Lead	Tracey Rawlinson	I	I	I	R	I
Test Lead	Surya Ramessh	C	C	C	C	C
WP4 Lead	Mark Pedersen	A	A	A	A	A
WP1 Lead	George Billinge	C	C	C	C	C
WP2 Co-lead	Asad Ali	C	C	C	C	C
WP2 Co-lead	Koliya Wedanage	C	C	C	C	C

WP3 Lead	Iain Corby[115]	I	I	I	I	I
WP5 Lead	Rhianne Kiddle	I	I	I	I	I
WP6 Lead	Keith Robinson	I	I	I	I	I
Project Co-director	Tony Allen	A	A	A	A	A
Project Co-director	Andrew Hammond	A	A	A	A	A

Figure 5: RACI Matrix. R=Responsible, A=Accountable, C=Consulted, I=Informed

Review and Approval Process: The test strategy, plans and results will be reviewed and approved using the following process:

1. Prepare Draft (1-5 days)
    - Responsible: Test Lead (i.e. author of the document).
    - Action: Create a draft of the test strategy, plan or results document, ensuring all necessary details are included (e.g., scope, test coverage, results).
2. Internal Review (1-2 days)
    - Responsible: Test Leads, WP4 Lead, WP1 Lead WP2 Co-Leads, Project Co-Directors.
    - Action: Team members review the document for accuracy, completeness, incorporation of ethical framework and alignment with AATT goals.
    - Output: Collect feedback via comments or a review form.
3. Feedback Incorporation (1-2 days)
    - Responsible: Test Lead (i.e. author of the document).
    - Action: Revise the document based on feedback. Clearly note any changes made.
4. Final Review and Approval (1 day)
    - Responsible: WP4 Lead, Project Co-Directors.
    - Action: Review the revised document for final approval. Stakeholders ensure:
        i. Requirements are covered.
        ii. Results are accurate.
        iii. Risks are addressed.
    - Output: Document is formally approved and ready for use. The approved document should be stored with version control for reference and audit purposes.

[115] We are including some reclusion methods for Iain Corby due to the conflict of interest arising from his role at the Age Verification Providers Association (AVPA). We will not inform him of activities in a way that could undermine confidence in the trial.

5. Data Protection and Ethical Framework

Age assurance and parental control technologies may impact the fundamental rights of internet users. The design, evaluation and deployment of these technologies is subject to intense public debate and scrutiny. Transparent ethical frameworks will therefore be implemented throughout the lifecycle of the AATT to give all stakeholders confidence that the trial is conducted in a principled, ethically rigorous manner.[116]

The AATT will be conducted in line with several guiding ethical principles: Respect, Transparency, Accountability, Fairness, Privacy and Safeguarding Children. The Project Ethics Committee will meet on an at least monthly basis to review trial activities and principles, ensuring that the guiding ethical principles are being observed.[117] These principles will be operationalised through several activities and deliverables, primarily sitting within Work Package One: Data, Ethics and Impartiality. Summaries of the AATT's approach to these issues are set out below.

5.1 Privacy and data protection

The impact of age assurance technologies on privacy and data protection are commonly cited concerns during research into user attitudes.[118] The trial will evaluate the potential impact of different age assurance technologies on user privacy, but it is also vital that the trial be conducted in a way that respects individuals' right to privacy. This includes ensuring individuals, including children and other individuals of different capacities, can make informed choices about how their personal information is collected and processed. Failing to include sufficient privacy safeguards during the trial risks harms such as identity theft, discrimination or surveillance. Such failures would significantly undermine confidence in the AATT.

The age assurance technology trial will involve the collection and processing of individual's personal information, including potentially sensitive information. This information may be exposed to algorithmic systems during evaluation activities. As such, strict safeguards will be implemented to respect the privacy of participants, with transparency and accountability mechanisms ensuring individuals are able to exercise their fundamental rights. Data collection will be limited to solely the data that are expressly required for the purposes of the trial and all data collected will be destroyed

[116] See A-1.1.1 Ethics Handbook for further detail.
[117] For terms of reference, see A-1.1.1 Ethics Handbook.
[118] https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/vsp/attitudes-to-age-verification/2022-adult-attitudes-to-age-verification-adult-sites.pdf?v=328580#:~:text=o%20From%20a%20personal%20perspective,online%20activities%20(figure%201).; https://www.drcf.org.uk/publications/papers/families-attitudes-towards-age-assurance-research-commissioned-by-the-ico-and-ofcom/.

once they are no longer needed. In addition, personal information will be pseudonymised and strict information management and security protocols will be followed throughout the course of the AATT.[119] Participants will be offered clear information about the data collection activities in comprehensible language, along with a single point of contact to ask questions, raise concerns or withdraw from participating in the trial.[120] Where particular efforts need to be made to ensure that historically marginalised communities, such as Aboriginal Australians and Torres Strait Islander People, are represented in the trial. First Nations communities will be involved in decision-making processes that affect them, ensuring their autonomy and perspective remain central to trial activities. Ongoing efforts to build relationships with First Nations communities will be respected, with full transparency being provided on the trial's scope, methodology and outcomes.[121]

5.2 Safeguarding children

As the AATT is evaluating technologies designed to protect children, some children will be involved in the trial. Respecting the rights and wellbeing of children, whether participating in the trial or more broadly, is a priority of the trial team. Children share all the fundamental rights of adults but may have diminished autonomy or differing capacities to exercise or advocate for their rights. As such, additional measures will be implemented to ensure that children participating in the trial are kept safe and feel supported at all stages, in line with the Australian Government's National Principles for Child Safe Organisations.[122]

Children participating in the trial will be informed of their rights in accessible language, offered opportunities to participate in decisions affecting them and have their views taken seriously. Child-focused processes will be implemented to respond to complaints and concerns regarding children's wellbeing and steps will be taken to ensure that team members working with children are supported to reflect child safety and wellbeing in practice.[123]

5.3 Impartiality

The AATT presents several risks to impartiality, whether real or perceived.[124] Both real or perceive risks to impartiality or conflicts of interest may undermine confidence in the outcomes trial. Transparent governance processes have therefore been implemented to identify and seek to mitigate threats to impartiality and to identify and mitigate real or perceived conflicts of interest. Key risks are identified in the initial impartiality report.[125] They include risks concerning government influence on the outcomes of the trial, the selection of age assurance technology vendors, potential of conflicts of interest and evaluation methodologies or approaches to reporting that favour one technology over another. Mitigation strategies have been identified and

[119] See A-1.1.2 Approach to Privacy Impact Assessment, A-1.1.3 Data Collection Ethical Protocol for further information.
[120] See A-1.3.1 Human Test Subjects Protocol.
[121] See A-1.3.2 Application of AIASTIS Code of Ethics for Aboriginal and Torres Strait Islander Research.
[122] https://www.childsafety.gov.au/resources/national-principles-child-safe-organisations.
[123] See A-1.2.1 Child Safeguarding Policy for further detail.
[124] Impartiality is defined for the purposes of this trial as "the presence of objectivity," in line with ISO/IEC 17065:2012.
[125] See A-1.4.1 Initial impartiality report.

implemented for each identified risk, newly identified risks to impartiality will be monitored, reported and addressed throughout the course of the trial.

Real or perceived conflicts of interest of AATT team members must be reported in the conflict of interest register.[126] Where appropriate, strict recusal procedures will be in place for members with identified conflicts during specific decision-making processes. The Project Ethics Committee will review potential conflicts and approve appropriate recusal measures. Where appropriate, the ACCS Impartiality Committee, who are independent of the AATT trial team, will be consulted to approve measures to mitigate real or perceived conflicts of interest. All conflicts, risks to impartiality and steps taken to mitigate these, will be published on the trial website. These oversight mechanisms and the trial's commitment to transparency will be fundamental to building confidence in the trial.

5.4 Transparency and Open Data

As part of ensuring transparency, academic rigour and repeatability, the AATT will make use of the Open Science Framework (OSF) platform[127]. This provides tool support to manage several aspects of the research project lifecycle. The key features of OSF that will be utilised in the trial are:

- Pre-registration: the AATT's aims and methods will be registered into the OSF. Importantly, these will not be editable once registration is complete. This counters problems like overfitting, p-hacking, cherry picking or hypothesizing after results are known (sometimes called "HARKing").
- Results data sharing: the AATT's test results will be stored on the OSF and made publicly available. This will enable results to be examined in detail by others interested in the study, for reasons such as repeating the tests, conducting further analysis of the results or conducting future research based on the results.
    - Importantly, test results will be made available publicly after (a) obtaining consent from test subjects and (b) sufficient pseudonymisation or anonymisation of test subject data. We will ensure that results data cannot be linked back to any individuals that acted as test subjects. This is integrated into the project's approach to data protection and ethics, described further in Section 7.

Following approval of the Evaluation Proposal Report (this deliverable), the AATT will be entered into OSF, beginning with the pre-registration step.

5.5 Managing Potential Research Bias

Managing and minimising research bias is a necessary part of the approach to ensuring the trial's results are reliable. Research bias refers to systematic errors that may arise during a study's design,

[126] See A-1.4.2 Conflict of Interest Register; A-1.4.2.1 Conflict of Interest Policy.
[127] The Open Science Framework, https://osf.io/

execution, or analysis, potentially resulting in misleading conclusions. It can emerge at any point in the research process and significantly affect the study's reliability and validity.

The UK's Critical Appraisal Skills Program defines the following kinds of research biases[128]:

- Placebo effect: This is a psychological phenomenon where a patient experiences an improvement in symptoms due to the belief that they are receiving treatment. This can inadvertently distort results of clinical trials where a 'placebo group' believes they are receiving the treatment under study.
- Hawthorne effect: This refers to the alteration of people's behaviour when they are aware they are being observed. This awareness can cause individuals to work harder, skewing the results of studies, particularly those involving human performance.
- Measurement bias: Occurs when data or information is not accurately recorded in a research study. This can stem from errors in data collection, inconsistent measurement tools, or subjective interpretation of data, leading to skewed and unreliable results.
- Publication bias: This is the tendency for researchers and editors to handle the reporting of experimental results that are positive (i.e., showing a significant finding) differently from results that are negative (i.e., supporting the null hypothesis) or inconclusive, leading to a misleading bias in the overall published literature.
- Observer/Experimenter bias: Is when the person conducting the research allows their expectations or beliefs to influence the results of the experiment. This can lead to distorted data, as the researcher may subconsciously favour results that confirm their own preconceptions or hypotheses.
- Reporting bias: Is a type of bias where researchers selectively report or omit information based on the outcome of the research or personal beliefs, which can distort the findings and undermine the integrity of the study.
- Sampling bias: Is when the selection of participants for a research study is not representative of the full population. The skewed sample could lead to a misrepresentation of the data and flawed conclusions.
- Recall bias: This occurs when the participants in a research study may not remember previous events or experiences accurately or they may subconsciously alter their memories. This can lead to skewed data and impact the credibility of the research results.
- Selection bias: Occurs when the method of selecting participants or groups for a study produces an outcome that is not representative of the total population. For instance, if the sample group is not randomised or certain groups are excluded, it could produce skewed or incomplete results.
- Confirmation bias: This is the tendency to favour, seek out, interpret and remember information in a way that confirms one's pre-existing beliefs or hypotheses, whilst giving

[128] UK Critical Appraisal Skills Programme (CASP), "Different Types of Bias in Research", https://casp-uk.net/news/different-types-of-research-bias/

disproportionately less consideration to alternative possibilities. This bias can lead to flawed conclusions as it may prevent researchers from accurately assessing all relevant data in a neutral manner.

In the table below, each type of research bias is assessed to identify whether it applies to this trial and, if it does, how it will be mitigated.

Type of Bias	**Applicable to AATT?**	**Mitigation**
Placebo effect	No, as there will not be any use of placebos	N/A
Hawthorne effect	Yes, during manual usability and acceptance testing with user participants	The survey and questionnaires for manual usability and acceptance tests will be designed to minimise psychological impact on user participants
Measurement bias	Yes	All tools and processes to and measure test results will be tested and internally validated prior to commencing evaluation
Publication bias	Yes	Publications from the trial containing results will only be published after being reviewed and approved by the trial's ethics committee. Also, all experiments will be registered in the Open Science Framework (OSF) and all results will be published after being appropriately anonymised.
Observer/Experimenter bias	Yes	Test designs will be reviewed internally before test implementation. The review process will include review and approval from the trial's ethics committee.
Reporting bias	Yes	Test results and findings will only be published after being reviewed and approved by the trial's ethics committee
Sampling bias	Yes	The sample for creating the test dataset and for manual usability and acceptance tests

		will be representative as described in Section 4.
Recall bias	Yes, during manual usability and acceptance tests	The user journey for manual and user acceptance tests is designed to capture information from user participants immediately after testing one of the systems assigned to them.
Selection bias	Yes	The sample for creating the test dataset and for manual usability and acceptance tests will be representative as described in Section 4.
Confirmation bias	Yes, when analysing practice statements from providers and then designing tests	Provider participants will have minimal input into the testing process. Their engagement will be limited to providing a practice statement to understand how their system works and how communications between the test lab and their system can be set up in order to perform tests. The test review and approval process includes ethical review and approval from the trial's ethics committee. This will ensure the minimisation of confirmation bias.

6 Stakeholder Engagement

6.1 Stakeholder Advisory Board

The project has established a Stakeholder Advisory Board to create a forum for representatives of key stakeholder groups to provide input. It is chaired by Professor Jon Rouse APM.

The trial itself is independent, so the Board is only advisory, but will provide the opportunity for a wide range of experts and people with an interest in age assurance technology and its applications to offer advice and challenge to the project team.

The board will publish minutes of its proceedings to ensure transparency and its membership will be listed on the project website.

6.2 Public and Participant Communications

The project has adopted a policy of transparency by default so as the trial progresses, all relevant documentation will be made available on the document repository in the project website, unless there is a compelling reason not to do so. The specific results of the trial will not be published prior to the final report's publication, but other papers relating to the process, such as testing approaches and plans will be available.

There will be an ongoing opportunity to provide feedback on any published documents which will be shared with the relevant members of the trial team, subject to supervision by the project's Ethics Committee to prevent inappropriate interventions.

The project intends to publish regular newsletters to anyone who signs up on the website to receive these.

Participants that are providers may be invited to discuss draft testing plans for their system and will then be shown provisional results, with time allowed for in the project plan to undertake remedial testing if it is agreed that something went awry.

To engage younger audiences and their guardians effectively, child-friendly materials such as infographics and explainer videos will be developed. Interactive sessions, such as focus groups and Q&A, will ensure clear communication of findings. This approach will foster greater understanding and inclusion among those directly impacted by age assurance technologies.

6.3 Recruitment of Age Assurance Providers and Relying Parties

A critical success factor for the trial is to persuade providers of a wide range of age assurance methods to put them forward for evaluation. The project team will look for opportunities to raise awareness of the trial and to build sufficient confidence in its approach that suppliers will be willing to participate.

There will need to be a particular effort to test methods which are not currently operating in a production environment. A good example is App-store based age assurance, where an app-store manages the process of checking a user's age and then makes that age attribute available to apps and websites to facilitate the application of age-restrictions. This is not in existence at present and the leading app stores are not supporting its development. In such examples, the project team will be as creative as possible to deliver sufficient evidence to allow these alternatives to be considered alongside existing systems.

The project will also seek to encourage relying parties which already implement age assurance to any extent to participate in the trial. This may include the use of third-party age assurance providers as part of wider system, for example by first monitoring user behaviour for contra-indicators that suggest self-declared age is inaccurate and then referring the user for a more extensive age assurance check.

As well as laboratory-based testing, the project intends to assess the user-experience of any operational method of age assurance. Working with a specialist test-purchasing service – also known as 'mystery shopping' - it will recruit a diverse set of test users who will be assigned tasks to test and then provide feedback across a range of methods.

6.4 Call for Participation

The Trial process will begin with a formal "Call for Participation" leading to "expressions of interest" from potential participants.

The success of the trial is dependent on being able to consider the full range of methods, to the extent they are sufficiently developed to be susceptible to testing. The aim of the call for participation is to encourage organisations to put forward a wide range of methods for testing as part of the trial. Even where a method does not yet exist above TRL 3, it needs to be submitted as an expression of interest to allow for desktop testing.

The call for participation will describe what the trial is seeking as follows:

- age verification processes that involve finding, validating and binding a date of birth from a record either somewhere or on something and then binding that to the correct individual;

- age estimation systems that involve the analysis of features or behaviours of humans that vary with age (this is not just about face age estimation);
- age inference techniques that involve any other facts or information about individuals from which it is reasonable to infer their age;
- control systems aimed at the parents or legal guardians of children to pre-set their online experience including any processes that deal with the evolving capacity of children to manage their own experiences as they age up;
- processes that seek and manage consent of parents or legal guardians at the point children encounter an age related eligibility requirement, including systems that manage consent revocation;
- platforms or services with end-to-end customer lifecycle experience management including in-app or in-service indicator and signal management when children are identified or suspected;
- deployments of multi-level successive validation approaches or those that are positioned in the tech stack to provide signals through app stores or at search level to enable providers of age restricted goods, services, content, venues or spaces to manage access through use of those signals.

To be selected for participation, it will be made clear that technology needs to:

- be available for deployment in the Australian context (but participants do not have to be based in Australia)
- have a technology readiness level of 4 or above (the higher the better). We will reinforce that we are interested in learning about tech at a readiness level of 1-3, but these systems will not be tested.
- have a practice statement applicable to your technology that is developed in accordance with clause 11 of ISO/IEC DIS 27566-1 - Age Assurance Systems - Part 1: Framework

Participants will also be advised that the trial team will providing tools to assist in the preparation of practice statements.

Expressions of interest will be captured in a Google form which will be sent to any organization that has completed the form on the project website indicating they might be interested in participating or who responds to the call for participation.

When the project website is live mid-January, the form will be available to complete online there as well. The call for participation will be formally issued on January 6th, 2025, with a deadline of January 25th.

EoI Contact details		
Field Label	**Field type**	**Required field**
Text: Please use this form to express an interest in submitting your age assurance system to the Age Assurance Technology Trial. If you wish to submit multiple but separate methods, please submit an additional form for each method. If you wish to include a combination of methods used successively (a waterfall approach) or in combination, please use one form.	Text to display (HTML)	-
Company name	Single line text Field	Yes
Contact (First name, Last name)	Name field	Yes
Lead contact Email	Email field	Yes
Lead contact Phone	Phone number field	Yes
Home country	Country field	Yes
Australian Office contact email if available	Email field	No
Australian Office contact phone if available	Phone number field	No
Select your area(s) of technology software testing: Age Verification Age Estimation Age Inference Parental Consent Parental Controls Alternative stack systems	Radio select button that allows for multi-select? Please confirm if they can choose more than one. [Asad: yes, more than one option should be allowed]	Yes
Technology Readiness Level (see https://www.gao.gov/assets/gao-20-48g.pdf) 1 Basic principles observed and reported 2 Technology concept formulated 3 Experimental proof of concept 4 Technology validated in lab 5 Technology validated in relevant environment (industrially relevant environment in the case of key enabling technologies) 6 Technology demonstrated in relevant environment (industrially relevant environment in the case of key enabling technologies) 7 System prototype demonstration in operational environment 8 System complete and qualified 9 Actual system proven in operational environment (competitive manufacturing in the case of key enabling technologies; or in space)	Radio select button for single selection of a number between 1 and 9	Yes
Brief Description of method (s)	Multi-line text field	Yes

7 Project Management and Risk Assessment

7.1 Quality Control Mechanisms

The AATT deploys a rigorous approach to Project Management, encompassing the tools, guidelines and templates for planning, managing and most importantly delivering the project. The structured Quality Management approach uses a PM² Project Management Methodology, making use of the PM² template set for projects, including the approach to Risk Management, Project Change and Deliverable Acceptance.

The approach to Quality Control is part of the overall management of quality in accordance with ISO 17065 Accreditation and deployment of laboratory testing in accordance with ISO 17025 Accreditation.

Document Protocol

There is a protocol for each document produced as part of the AATT, whether that be a Deliverable, Report or Plan. So, as part of the Quality Control Process at the beginning of each document, there will be key data including information on the Work Package Lead, Task Leader, Document Version and Document Sensitivity level. There is also a list of Document 'Approvers' and 'Reviewers' associated with each Project Document, who have an action either to Approve or Review the document (or both), according to their role within the Project. For instance, the 'Task Leader' for any given Project Task, is always required to Review the document, as is the Work Package Lead for which the task belongs.

Document History

In terms of Document History, to request a change to a particular document, the Team Member in question must contact the Document Author or Project Owner, who has the authority to approve that change.

The Quality Control Mechanisms are central to Milestone 3 and Milestone 4 of the Project, the Delivery of a Preliminary Report in [M6]and Completion of the Final Report in [M8]. For the Preliminary Report, there will be an extensive quality control focus, whereby the Report will be proofread, sense checked and its accuracy validated, by a dedicated sub-set of the Project Team.

When it comes to Final Report Production, the quality control associated with that will include the necessary pre-publication checks and clearances that are required to include:

- The Department;
- eSafety Commissioner and Office of the Australian Information Commissioner (OAIC);

- Ethics Review in accordance with AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research;
- Peer Review by Prof. Toby Walsh at the University of South Wales.

7.2 Risk Management Plan

The Project has a Risk Management Plan[129] which defines and documents the Risk Management Process for the Age Assurance Technology Trial. It describes how risks will be identified and assessed, what tools and techniques can be used, what the evaluation scales and tolerances are, the relevant roles and responsibilities, how often risks need to be revisited, etc. The Risk Management Plan also defines the risk monitoring and escalation process as well as the structure of the *Risk Register* which is used to document and communicate the risks and their response actions.

The purpose of that document is:

- To outline the risk approach and process to be used for the project;
- To identify the roles and responsibilities related to risk management;
- To specify the methodology, standards, tools and techniques used to support risk management.

The Risk Register currently identifies 7 Key Risks. A selection of the main risks include:

01. **Data Ethics associated with Working with Human Test Subjects, including Aboriginal and Torres Strait Islander peoples (WP1 - 6)**. There is the possibility that the Technology Trial may not address the critical risks associated with data, ethics and impartiality that will arise throughout the project when it comes to working with human test subjects.
STRATEGY - PREVENT. The creation of key project documentation and processes, including an Ethics Handbook (A-1.1.1), a Data Collection Ethical Protocol (A-1.1.3), a Human Test Subjects Protocol (A-1.3.1)and Application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research for Data Collection Phase (A-1.3.2) will address any issues relating to the data ethics of working with human test subjects.
02. **Exclusion of Aboriginal and Torres Straight Islander peoples (WP1 -6).** The Technical Trial may risk excluding certain demographics, including Aboriginal people, from participation.
STRATEGY - PREVENT. The project needs to ensure that multi-ethnic diverse communities are included in the demographic spread of human test subjects. This will be achieved through the application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research and initial and ongoing Equality, Diversity and Inclusion Monitoring.

[129] The latest version of this controlled document is stored in AATT SharePoint WP 6 – Programme Management, Risks & Quality Control – T6.3 – Risk Management.

03. **Lack of public trust in the project.** There is the risk that the general public will not have trust in the age assurance technology trial and its goals and objectives, which would reduce project credibility.
    STRATEGY - ACCEPT. This is a risk that cannot be avoided; public trust can be subjective. However, Work Package 3 deals with Communications, including creation of a Project Website and blog and aims to secure transparency and maintain public confidence in the project. The sub-contractor who will build the website has a wealth of experience and impressive portfolio in this field.

7.3 Project Compliance and Monitoring

As part of the compliance with the AATT's Principal Contract Requirements, there is a requirement for all Project Team Members to keep and update a Timesheet, which they submit to the Project Finance Team (WP6 Project Management Leads) at the end of each month. The Finance Team and The Department must approve any expenses.

Each Project Subcontractor has a Contract and is given a Purchase Order (PO) each month, setting out estimated allocation of hours for them for that month. Timesheets for everyone within a particular Subcontractor (for example for each Team Member within the KJR Team) are collated together and an invoice is submitted monthly for appropriate reimbursement of time and expenses.

Project Compliance and Work Package 6: Programme Management, Risks & Quality Control

Project Compliance is also central to Work Package 6 of the AATT, with Task 6.5 focused on assurance for contract compliance, accounting for the spending of public money, accounting and audit. Various activities are associated with this from the onset of the Project, including identification of contract compliance issues relevant to the Project and as described above, completion of sub-contracting arrangements, contracts and banking payments (including ethics, AML and sanctions compliance in M2. There will also be Accounting for Expenditure at the half-way point of the Project [M4].

Task 6.5 also includes adherence to standards, including existing ISO/IEC 17065 accreditation and the Protective Security Policy Framework, Privacy Act 1988, any Legislative Requirements, Chief Executives Instructions, Archives Act 1983, Public Governance, Performance, Accountability Act 2013and any requirements of the Australian National Audit Office. Project Compliance would not be complete without full adherence to these relevant regulations and laws.

Task 6.6 is linked with T6.5 above and is the Performance Review & Project Evaluation. This Task involves internal and external review of contract performance, including assurance from project legal advisors on compliance, any external audit of expenditure required (as outlined in T6.5) and an analysis of the timelines and acceptability of project deliverables.

Contract Management Meetings

Project Compliance in the day-to-day management of the AATT is vital to achieving consistency and ensuring the appropriate level of monitoring required. A variety of meetings are held and are ongoing, including fortnightly Project Team meetings, monthly Contract Management meetings with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA). There is also a weekly Project Directors' meeting, whereby the two Project Directors convene to update on a birds-eye view of the AATT, including tasks and deliverables in progress, actions and any other important developments that they need to be made aware of.

8 Appendices

8.1 Glossary of Terms

Term	Definition
Acceptance testing	Testing of a software system's functions by end-users to validate the system's functionality and usability
Accuracy	How well the age assurance system can detect a user's age
Age Assurance	The set of processes and methods used to verify, estimate or infer the age or age range of an individual.
Age Assurance Provider	Entity responsible for providing the result of an age assurance to a relying party.
Age assurance result	information produced by an age assurance system indicating that an individual is a certain age, over or under a certain age or within an age range
Age Assurance Solution	Equivalent to Age Assurance System.
Age Assurance System	A system that uses age assurance methods to determine an individual's age and provide a result about that age.
Age Estimation	Age assurance method based on analysis of biological or behavioural features of humans that vary with age
Age gate	A mechanism used to restrict access to content, products or services based on a user's age. It typically involves verifying or attesting that a user meets the minimum age requirement before granting access.
Age Inference	Age assurance method based on verified information which indirectly implies that an individual is over or under a certain age or within an age range
Age restriction	Equivalent to age-related eligibility decision
Age Verification	Age assurance method based on calculating the difference between a verified year or date of birth of an individual and a subsequent date
Age-related eligibility decision	action by a relying party to determine access to goods, content, services, venues or spaces based on an age limit or an age band.
Authoritative party	Entity that is recognized to have the right to create and manage a record that contains a set of attributes that allows an individual to be uniquely identified within a given context
Automated Testing	Automated testing uses tools to perform tests with none or minimal human intervention.
Avatar	A virtual representation or model of a user or system entity used during testing activities. The avatar is often used to simulate real users or interactions within a system, especially in the context of user experience testing or automated testing.

Bias	A systematic error or deviation introduced into a process, measurement or outcome, leading to results that do not accurately reflect the intended objectives or population
Binding	Property that relates a result of age assurance to the correct individual.
Circumvention	Attacks on age assurance systems that manipulate it to produce an incorrect result. This specifically includes biometric presentation attacks and spoofing attacks.
Class 1 material	Under the Online Safety Act 2021, this is material that is classified or is likely to be classified, as 'RC' according to the Australian Classification Board ratings.
Class 2 material	Under the Online Safety Act 2021, this is material that is classified or is likely to be classified, as either X 18+ or R 18+ according to the ACB ratings.
Classification Accuracy	The accuracy is the proportion of the sample that has been correctly classified as being over or under the age threshold.
Data security	how well the age assurance system safeguards users' personal information from unauthorised access, breaches or theft through, for example, the use of security by design principles and resistance to presentation attacks
Ease of use	how simple the age assurance system is to operate, including how the system offers functionality appropriate to the capacity and age of a child or adult, up to and including those of retirement age
Entry criteria	The set of conditions or requirements that must be met before the testing process can begin.
Exit criteria	The conditions or requirements that must be met to conclude the testing process
False Negative Rate (FNR)	The technology's miss rate (i.e., incorrectly identifying someone as being under the age threshold). It is the proportion of the sample who have been predicted as being under the threshold among those who are over the age threshold.
False Positive Rate (FPR)	The technology's probability of false alarm (i.e., incorrectly identifying someone as being over the age threshold). It is the proportion of the sample who have been predicted as being over the threshold among those who are not over the age threshold.
Minimisation of bias	how well the age assurance system avoids racial or other bias
Functional testing	Testing of a software system's functions to validate the implementation of its functional requirements
Human rights protections	how an age assurance system is accessible and inclusive to users, does not unduly restrict access of users who should

	have access and provides sufficient and meaningful information for a user to understand its operation.
Identity document	physical or digital document issued by an authoritative party containing identifying attributes of an individual.
Individual	Human being, i.e., a natural person, who acts as a distinct indivisible entity or is considered as such
Interoperability	how well the age assurance system can be used across multiple online platforms
Manual testing	Humans performing tests by entering information into a test item and verifying the results
Material	Under the Online Safety Act 2021, this is encompasses various forms of content, including films, computer games, publications and other types of audio, visual or audio-visual content.
Non-functional testing	Testing of a software system's functions to validate the implementation of its non-functional requirements, such as performance and security.
Online Platform	a service that allows end-users to access material using a carriage service; or a service that delivers material to persons having equipment appropriate for receiving that material, where the delivery of the service is by means of a carriage service This does not include a broadcasting service; or (a datacasting service (within the meaning of the Broadcasting Services Act 1992).
Outcome Error Parity (OEP)	A measure of the variance of an accuracy metric across subdivisions of the sample, such as gender skin tone.
Parental Consent	Consent from a person holding parental authority over a child
Parental Control	Parental control systems allow an adult responsible for a person under the age of 18 a degree of control over what content the child can see or hear.
Practice statement	Documentation of the practices, procedures and controls employed by an organization to fulfil a service
Presentation attack	Where an individual presents an external physical or digital object, such as a picture, pre-recorded audio or video clip or 3D masks to the age assurance system to circumvent it.
Presentation Attack Detection (PAD)	Automated discrimination between bona-fide presentations and biometric presentation attacks.
Protection of privacy	how well the age assurance system protects users' personal information, including data minimisation techniques
Reliability	how consistently the age assurance system can produce the same result
Relying party	Entity that relies on the results of age assurance to make an age-related eligibility decision.

Spoofing attack	When an individual attempts to fool the age assurance system, by presenting themselves to the system with artificial alterations such as wearing a fake beard.
Static Review	Evaluation of a test item where no execution of the code takes place and can be performed manually.
Successive validation	Type of age assurance process where multiple independent age assurance methods are used sequentially to establish an age assurance result
System testing	Testing of a software system's functional and/or non-functional performance against a set of requirements
Technology Readiness Level (TRL)	The technical maturity of a technology. They enable consistent, uniform discussions of technical maturity across diverse types of technology
Test case	A test case is a set of input values, execution conditions, expected results and procedures used to determine whether a specific feature or functionality of a system is working correctly.
Test data / Test dataset	data created or selected to satisfy the input requirements for executing one or more test cases
Test Item	Work product to be tested
Test procedure	Sequence of test cases in execution order, with any associated actions required to set up preconditions and perform wrap up activities post execution.
Test script	Document specifying one or more test procedures
Testing	Set of activities conducted to facilitate discovery and evaluation of properties of test items
True Negative Rate (TNR) – Also known as Specificity	The technology's ability to correctly detect people who are not over the age threshold. It is the proportion of the sample who have been predicted as being under the threshold among those who are under the age threshold.
True Positive Rate (TPR) - Also known as Sensitivity	The technology's ability to correctly detect people who are over the age threshold. It is the proportion of the sample who have been predicted as being over the age threshold among those who are over the age threshold.
User	Equivalent to Individual
User journey	The sequence of steps a user takes to accomplish a specific goal while interacting with a product, service or system.

8.2 Detailed Gantt Chart

The project plan, including a detailed Gantt Chart and full description of all work packages is available online[130].

8.3 Risk Matrix

The AATT's risk register is covered as part of Deliverable D-6.3 Risk Management Plan. The risk register is copied from that deliverable in Figure 6 below.

Risk Description & Causes			Mitigation & Contingency Actions		
KEY RISKS					
01. Data Ethics associated with Working with Human Test Subjects, including Aboriginal and Torres Strait Islander peoples. (WP1 - 6). There is the possibility that the Technology Trial may not address the critical risks associated with data, ethics and impartiality that will arise throughout the project when it comes to working with human test subjects.			STRATEGY: PREVENT. The creation of key project documentation and processes, including an Ethics Handbook (A-1.1.1), a Data Collection Ethical Protocol (A-1.1.3), a Human Test Subjects Protocol (A-1.3.1), and Application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research for Data Collection Phase (A-1.3.2) will address any issues relating to the data ethics of working with human test subjects.		
Likelihood 7/10	***Impact 8/10***	***Assessment 56/100***	***Likelihood 5/10***	***Impact 7/10***	***Assessment 35 /100***
02. Exclusion of Aboriginal and Torres Straight Islander peoples (WP1 -6). The Technical Trial may risk excluding certain demographics, including aboriginal people, from participation.			STRATEGY: PREVENT. The project needs to ensure that multi-ethnic diverse communities are included in the demographic spread of human test subjects. This will be achieved through the application of the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research, and initial and ongoing Equality, Diversity and Inclusion Monitoring.		
Likelihood 7/10	***Impact 9/10***	***Assessment 63/100***	***Likelihood 5/10***	***Impact 3/10***	***Assessment 15/100***
03. Lack of public trust in the project. There is the risk that the general public won't have trust in the age assurance technology trial and its goals and objectives, which would reduce project credibility.			STRATEGY: ACCEPT. This is a risk that can't be avoided; public trust can be subjective. However, Work Package 3 deals with Communications, including creation of a Project Website and blog, and aims to secure transparency and maintain public confidence in the project. The sub-contractor who will build the website has a wealth of experience and impressive portfolio in this field.		
Likelihood 6/10	***Impact 7/10***	***Assessment 42/100***	***Likelihood 3/10***	***Impact 4/10***	***Assessment 12/100***
MANAGERIAL RISKS					
M01. Project Time Line (WP6). As there are a number of interdependencies between the Work Packages, including requirements for completion of certain milestones before further activity can progress, this runs the risk of project over-run if milestones are missed. Failure to meet timelines would reduce alignment with progress in the age assurance space, as well as being unprofessional.			STRATEGY: REDUCE. The Project will be managed through the PM2 Quality Management Suite and in accordance with ACCS's Integrated Management System. The fortnightly Project Team Meetings, as well as the Monthly Contract Meetings, will maintain impetus and reduce the risk of project over-run.		
Likelihood 5/10	***Impact 7/10***	***Assessment 35/100***	***Likelihood 2/10***	***Impact 7/10***	***Assessment 14/100***
M02. Undertaking this project with Australian and UK sub-contractors. As a variety of different sub-contractors are involved in the technology trial, we may see some risk in project management owing to individuals moving at different speeds.			STRATEGY: PREVENT. This risk will be prevented by maintaining a well-planned Project Plan. Everybody involved in the project in their different capacities are well aware of the fact this is an 8 month project and a pro active working attitude and efficiency is key.		
Likelihood 5/10	***Impact 4/10***	***Assessment 20/100***	***Likelihood 2/10***	***Impact 4/10***	***Assessment 8/100***
M03. Engagement and Communications (WP3). Participants need to be recruited for the technology trial, including test subjects and age assurance providers, but there runs the risk of an insufficient number and types of participants being found.			STRATEGY: REDUCE. Maintaining a comprehensive and thorough Project Plan, including the establishing of a Project Advisory Board, hosting of an initial Project Stakeholder Event to set out the project plan, and outreach to at least six schools geographically spread across Australia to secure test subject participation, will massively reduce this risk.		
Likelihood 8/10	***Impact 7/10***	***Assessment 56/100***	***Likelihood 4/10***	***Impact 8/10***	***Assessment 32/100***
ENVIRONMENTAL, SOCIAL, GOVERNANCE (ESG) AND OTHER RISKS					
ESG01. The Call for Participation, seeking test subjects, including children, poses the risk that children may not be appropriately safeguarded in the technology trial.			STRATEGY: PREVENT. Creation of a thorough and well thought out Project Plan, taking into account the ethics of having children as participants, will prevent this risk. The recruitment process includes establishing the consent mechanisms (T1.1), safeguarding children (T1.3) and the ethical considerations surrounding this (T1.3).		
Likelihood 6/10	***Impact 9/10***	***Assessment 54/100***	***Likelihood 3/10***	***Impact 6/10***	***Assessment 18/100***

Figure 6 Risk Register

[130] https://ageassurance.com.au/wp-content/uploads/2024/11/D6.1-Project-Plan.pdf

From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 3 February 2025 6:34 PM
To: Julie Inman Grant
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

We're here until Friday evening.

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 03 February 2025 7:31 AM
To: Tony Allen s 47F @accscheme.com>
Subject: RE: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

OFFICIAL

How long are you in town? I'm in Canberra tomorrow night through Thursday and also in Canberra and Melbourne four days next week. I'm training for a triathlon at the end of February so that makes me slightly less fun....Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 3 February 2025 6:26 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Hi Julie,

I'm having a much harder time keeping track of myself!

I appreciate that you're really busy, but if you'd like to come out and join the team for a drink whilst we're here in Sydney, you would be very welcome.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 03 February 2025 7:22 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: RE: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

OFFICIAL

Tony – Thanks for sending the final through – its an impressive piece of work. Frankly, I'm having a hard time keeping track of you – UK, Netherlands, DC, Florida, now Australia. I hope you're circadian rhythms are coping okay! Glad to hear you are meeting with my team and releasing the paper this week. We also appreciate how consultative you have been.

All the best,

Julie

From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 3 February 2025 10:31 AM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Hi Julie,

Thank you for all of your comments and suggestions for the Evaluation Proposal Report. You will now find attached the approved version which has gone to print and that we plan to publish on Thursday 6th February.

I'm looking forward to meeting with some of the team there again later today.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 18 January 2025 2:37 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Thanks Tony for being so consultative - all in between Supreme Court visits in the brutal cold! I'll revert back when I'm in the office on Monday and look forward to seeing you on your upcoming trip to Australia. Julie

Get Outlook for iOS

From: Tony Allen s 47F @accscheme.com>
Sent: Saturday, January 18, 2025 11:57:18 AM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 47E(d) @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

Dear Julie,

Thank you to you and the team for your very valuable input to the Evaluation Proposal for the Age Assurance Technology Trial.

I am pleased to be able to share a revised proposal document and, for your ease, a tracked changes version of the document too.

The attached document has also been reviewed and input provided from colleagues at the Department for Infrastructure and the Office of the Australian Information Commissioner. In addition, we have taken into account comments from s 47F at the University of New South Wales as a part of his independent validation process.

We have now released an embargoed copy of the report to s 47F, Chair of the Stakeholder Advisory Board, for him to circulate to the Board and invite comments and discussion at their meeting on 29th January. We have advised him that we would welcome any editorial, technical or requests for greater explanatory information type comments from the Stakeholder Advisory Board. We do not intend, at this stage, to make any further changes that would affect the underlying independent validation of the approach to the Trial.

It remains our intention to publish the final version of this document on 6th February.

Thank you again for all of your input and support with this project.

Best Regards

Tony

From: Julie Inman Grant
Sent: Sunday, January 12, 2025 10:11 PM
To: Tony Allen
Cc: s 22; s 47E(d); s 22
Subject: eSafety Input on AATT evaluation paper [SEC=OFFICIAL]

OFFICIAL

Dear Tony

The broader eSafety team has now had the chance to review the Evaluation Proposal and provide some comments and proposed edits. Thanks again for the opportunity to do so.

By way of brief overview:

- The team has added comments providing references to specific sections of the AV Roadmap Background Report and Phase 2 Codes Position Paper, which provide some language as requested re the intersections between the Social Media Act and other components of the OSA, as well as types of class 1 material.
- This is noted in a comment in the paper relating to the Ethics Committee but for easy reference, the relevant point of contact from the OAIC is s 22 @oaic.gov.au).
- We would be happy to set up a meeting to brief s 47F on the Phase 2 Codes and can provide a summary of all the age assurance related measures in the current iteration of the draft codes once the MOU has been finalised. s 22 can assist with scheduling.

The team is happy to set up a time to discuss further if you have any follow up questions before publication at the end of the month. For your visibility, I am on leave this week, but s 22 (copied) will be acting Commissioner in my absence and can action any further queries.

All the best,
Julie

Julie Inman Grant
Commissioner

s 22

Executive Assistant: s 22 @esafety.gov.au

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

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From: s 22
Sent: Friday, 7 February 2025 2:07 PM
To: s 47F @illuminatetech.co.uk>; Tony Allen s 47F @accscheme.com>; s 47F illuminatetech.co.uk>
Cc: s 22 ; s 47F
Subject: Follow up - AATT & eSafety Briefing - Phase 2 Codes and SMMA Timeline [SEC=OFFICIAL]
Attachments: Phase 2 Codes and SMMA - Timeline.pdf

OFFICIAL

Hi s 47F Tony,

Thank you (and your team members) for attending the briefing session at eSafety on Monday, 3 February.

For your reference, please see attached our current timeline for the development of the Phase 2 Codes and the Social Media Minimum Age.

We should also have an update for you regarding the MoU next week.

If you have any questions, please feel free to let me know.

Cheers,

s 47E(d)

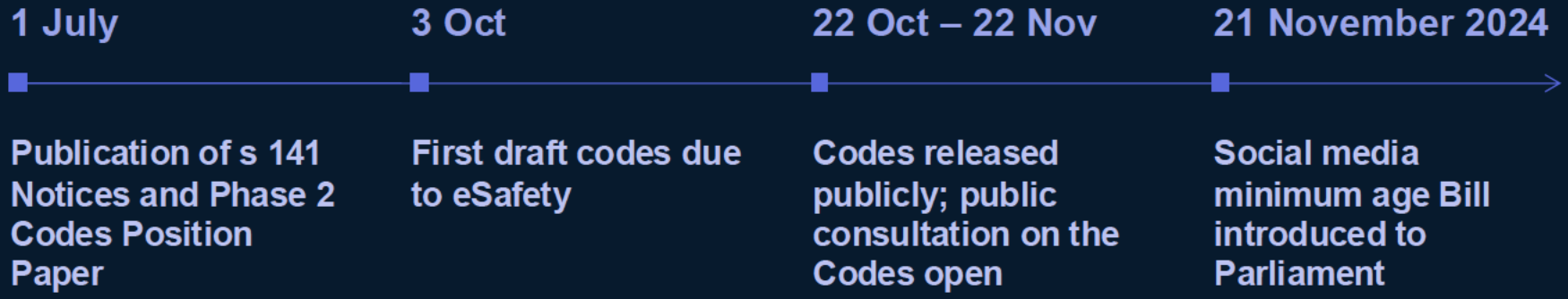
s 47E(d)

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past, present and future.

Timeline

Phase 2 Codes and Social Media Minimum Age

eSafety FOI 25143
Document 46 of 75



Timeline

Phase 2 Codes and Social Media Minimum Age

December 2024

10th - Social media minimum age bill receives Royal Assent

13th - Commissioner grants extension request for deadline to submit Phase 2 Codes

28 Feb 2025

Final Codes due to eSafety for review for registration

April 2025

Age Assurance Trial Preliminary Report due

June 2025

AAT Final Report and Summary due

Timeline

12 December 2025

Date by which social media minimum age civil penalty provisions must take effect

Other relevant events in 2025 (no defined timeframe)

- Potential publication of legislative rules relating to the social media minimum age which can specify
  - inclusions or exclusions of services from the restriction
  - restrictions on the type of information which can be gathered for the purpose of complying with “reasonable steps”
- eSafety Commissioner decision to register Phase 2 Codes or proceed to Standards
- Australian Federal Election and caretaker period
- eSafety will develop guidance about ‘reasonable steps’ to ensure age-restricted users do not hold accounts on age-restricted platforms

From: Tony Allen s 47F @accscheme.com>
Sent: Tuesday, 11 February 2025 4:41 PM
To: s 22
Cc: s 22 r
Subject: Re: Follow up - AATT & eSafety Briefing - Phase 2 Codes and SMMA Timeline [SEC=OFFICIAL]

Some people who received this message don't often get email from tony.allen@accscheme.com. Learn why this is important

Hi s 22

That's great. I am just travelling at the moment (finally on my way back to the UK), but I'll get this done when I'm in the office so you should get an Adobe link within the next 24 hours. If you don't receive it, please check your junk mail or contact me.

Best Regards

Tony

From: s 22 @eSafety.gov.au>
Sent: 10 February 2025 10:05 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Follow up - AATT & eSafety Briefing - Phase 2 Codes and SMMA Timeline [SEC=OFFICIAL]

Hi Tony

With thanks to our legal team, please find an updated clean copy **attached** with the stray reference to ACCS expunged.

We have nominated you as the 'contact person' for the schedule, but haven't completed all the details (phone number, postal address), nor altered the signature block for execution by a UK rather than Australian company if you're able to adjust before executing.

We are happy to use Adobe sign if you are able to set it up – please feel free to use my email address as the authorised signatory.

Kind regards
s 22

s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: Tony Allens 47F @accscheme.com>
Sent: Monday, 10 February 2025 2:40 PM
To: s 22 @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Follow up - AATT & eSafety Briefing - Phase 2 Codes and SMMA Timeline [SEC=OFFICIAL]

Hi s 22

I am content with this MoU.

I have just one amendment, you use the acronym ACCS in the names of the parties and I think this should be AVID (in the legal sense of this document).

Other than that, the document is absolutely fine.

How would you like to approach execution of it. If you have an e-signing platform, we could use that or we use Adobe sign if you would like us to set it up for e-signing. I just need to know the email address of the authorised signatory at your end.

Best Regards

Tony

From: s 22 @eSafety.gov.au>
Sent: 09 February 2025 10:54 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Follow up - AATT & eSafety Briefing - Phase 2 Codes and SMMA Timeline [SEC=OFFICIAL]

OFFICIAL

Hi Tony

We hope your workshops and stakeholder meetings in Australia last week were productive! Thanks again for your time last Monday.

Following on from s 22 's email below, eSafety has prepared a draft MoU to facilitate information sharing between Avid Certification Services Ltd and eSafety during the course of the Age Assurance Technology Trial. Please see **attached** for your consideration.

Please let s 22 or me know if you have any suggested amendments – also happy to discuss on a call. Once you have taken a look we can attend to any amendments and/or execution on our end.

Kind regards,
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: s 22 @esafety.gov.au>
Sent: Friday, 7 February 2025 2:07 PM
To: s 47F @illuminatetech.co.uk>s 47F @illuminatetech.co.uk>; Tony Allen s 47F @accscheme.com>s 47F @accscheme.com>; s 47F @illuminatetech.co.uk> s 47F @illuminatetech.co.uk>
Cc: s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 47F @kjr.com.au>; s 47F @kjr.com.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 47F @kjr.com.au>; s 47F @holdingredlich.com>; s 47F @gmail.com>; s 47F @kjr.com.au>; s 47F @kjr.com.au>
Subject: Follow up - AATT & eSafety Briefing - Phase 2 Codes and SMMA Timeline [SEC=OFFICIAL]

OFFICIAL

Hi s 47F Tony,

Thank you (and your team members) for attending the briefing session at eSafety on Monday, 3 February.

For your reference, please see attached our current timeline for the development of the Phase 2 Codes and the Social Media Minimum Age.

We should also have an update for you regarding the MoU next week.

If you have any questions, please feel free to let me know.

Cheers,

s 22

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MEMORANDUM OF UNDERSTANDING

between

The Commonwealth of Australia as represented by the eSafety Commissioner
ABN 36 342 015 855
Level 5, 65 Pirrama Road, Pyrmont, NSW, 2009

and

Avid Certification Services Ltd
Company number 14865982
Unit 321 Broadstone Mill, Broadstone Road, Stockport, Cheshire, England, SK5 7DL

(each a **Party**, collectively the **Parties**)

---

1. Purpose of the Memorandum

1.1 This Memorandum of Understanding (**MoU**) establishes a framework for cooperation between the eSafety Commissioner (**eSafety**) and the AVID Certification Services Ltd (**AVID**) with respect to the age assurance technology trial being conducted by AVID under contract to the Australian Government.

1.2 The purpose of this MoU is to facilitate the sharing of information between the Parties on a confidential basis, ensuring that such cooperation does not encroach upon the independence, remit, jurisdiction, or statutory responsibilities of either Party.

1.3 Except as set out in clause 6 (Confidentiality), this MoU is a voluntary statement of the intention of the Parties at the time of signing this MoU, and is not intended to create, and does not create, any legally binding obligations between the Parties. However, both Parties will act and cooperate in good faith in accordance with the terms of this MOU. The Parties agree that clause 6 is intended to be legally binding and survive termination or expiry of this MoU.

---

2. Background

2.1 eSafety is Australia's national independent regulator for online safety, with statutory responsibilities under the *Online Safety Act 2021* (Cth) to improve and promote online safety for Australians.

2.2 AVID is an independent certification body specialising in the accreditation and validation of age assurance technologies to ensure compliance with recognised standards and best practices.

2.3 This MoU reflects the mutual recognition of the importance of collaboration to support the effective development and deployment of age assurance technologies while maintaining each Party's operational independence and statutory obligations.

---

3. Interpretation

3.1 In this MoU, unless the contrary intention appears:

a. words importing a gender include any other gender;

b. words in the singular include the plural and words in the plural include the singular;

c. clause headings are for convenient reference only and have no effect in limiting or extending the language of provisions to which they refer;

d. words importing a person include a partnership and a body whether corporate or otherwise;

e. a reference to dollars is a reference to Australian dollars;

f. a reference to any legislation or legislative provision includes any statutory modification, substitution or re-enactment of that legislation or legislative provision;

g. if any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;

h. a reference to an Item is a reference to an Item in the Schedule;

i. the Schedule forms part of this MoU;

j. if any conflict arises between the terms and conditions contained in the clauses of this MoU and any part of the Schedule (and Attachments if any), the terms and conditions of the clauses prevail;

k. if any conflict arises between any part of the Schedule and any part of an Attachment, the Schedule prevails; and

l. a reference to writing is a reference to any representation of words, figures or symbols, whether or not in a visible form.

3.2 Unless the contrary intention appears a term in bold type has the meaning shown opposite it:

Commencement Date	means the commencement date of this MoU, as specified in Item 1;
Commonwealth	means the Commonwealth of Australia;
Confidential Information	means: a. in respect of eSafety's confidential information: i. any information that is by its nature confidential that is provided by *AVID* to eSafety or that AVID otherwise accesses or becomes aware of as a result of this MoU, including eSafety's: A. Data; and B. Personal Information. i. information AVID knows or ought to know is confidential; b. in respect of AVID's confidential information, any information that is by its nature confidential that is provided by AVID to eSafety or otherwise specifically agreed by the Commission as being confidential.
Contact Officer	means the contact officer of each of the Parties, as specified in Items 2 and 3 respectively;
Expiry Date	Means the expiry date of this MoU, as specified in Item 1
MoU	means this Memorandum of Understanding;

Personal Information	has the same meaning as it has in the *Privacy Act 1988* (Cth);
Personnel	means a Party's officers, employees, agents, contractors and subcontractors (and, where relevant, each agent's, contractor's and subcontractor's personnel) relevant to this MoU, but unless the context otherwise requires, does not include the other Party;
Schedule	means the schedule to this MoU entitled 'MoU Details', and includes the Schedule as amended or replaced from time to time by agreement in writing between the Parties;

3.3 Any ambiguity or uncertainty arising out of this MoU is to be resolved in a way that is consistent with relevant legislation or any other laws giving rise to the Parties' respective operational independence, statutory duties and/or obligations.

3.4 This MoU is governed by, and is to be construed in accordance with the law for the time being in force in the State of New South Wales and the Parties submit to the non-exclusive jurisdiction of the courts of New South Wales.

---

4. Term

4.1 This MoU commences on the Commencement Date and operates until the Expiry Date.

4.2 Prior to the expiry of the Term, the Parties may, by mutual agreement, extend the Term by providing written notice to each other.

---

5. Scope of Cooperation

5.1 The Parties commit to cooperate in the following areas:

a. sharing non-personal, anonymised information about methodologies, findings, and insights from the age assurance technology trial being conducted by AVID on behalf of the Australian Government

b. exchanging technical expertise and research to support the development and improvement of age assurance technologies

c. collaborating on frameworks for assessing the effectiveness, privacy safeguards, and compliance of age assurance systems

d. sharing information about, or obtained through eSafety's:

   i. research

   ii. stakeholder engagement

   iii. regulatory processes or

   iv. other means

   which has relevance to the development, evaluation or implementation of age assurance systems and technologies and associated protective measures, and where such sharing is both lawful and appropriate in the circumstances.

5.2 Cooperation will be conducted in a manner that:

a. respects each Party's jurisdiction, independence, and statutory responsibilities

b. avoids any duplication of effort or conflicting actions.

---

6. Confidentiality

6.1 The Parties acknowledge that information shared under this MoU may include Confidential Information. Both Parties agree to:

a. treat shared information as confidential, using it only for purposes consistent with this MoU

b. prevent the disclosure of such information to third parties without the prior written consent of the other Party, except as required by law.

6.2 Any information sharing under this MoU will comply with applicable laws and regulations, including but not limited to privacy and data protection laws.

6.3 An obligation of a Party under this clause 6 will not be taken to have been breached to the extent that Confidential Information:

a. is disclosed in accordance with the provisions of this MoU by a Party to its Personnel for the sole purpose of, and only to the extent strictly necessary to, comply with its obligations, or to exercise its rights, under this MoU;

b. is made available by a Party to its management Personnel on a "needs to know basis";

c. is made available by a Party to its auditor or a professional adviser on a "needs to know basis" and in such circumstances where they are legally bound to comply with confidentiality and security requirements no less stringent than under the terms of this MoU;

d. is disclosed for use by any Minister of the Australian Government;

e. without limiting the application of this clause 6, is disclosed in order to respond to a request or direction of a House, or a request by a Committee, of the Parliament of the Commonwealth of Australia, for information;

f. is used by the Commissioner or disclosed to and used by another agency, where this serves the Australian Government's legitimate interests;

g. is authorised or required by law to be disclosed;

h. is in or comes into the public domain otherwise than due to a breach of this clause 6;

i. is in the possession of the receiving Party without restriction in relation to disclosure before the date of receipt from the disclosing Party; or

j. has been independently developed or acquired by the receiving Party.

6.4 Where a Party discloses Confidential Information to another person:

a. pursuant to clauses 6.3.a, 6.3.b, 6.3.c, or 6.3.f, the disclosing Party must:

i. notify the receiving person that the information is Confidential Information; and

ii. not provide the information unless the receiving person agrees to keep the information confidential; or

b. pursuant to clauses 6.3.d or 6.3.e, the disclosing Party must notify the receiving Party that the information is Confidential Information

c. pursuant to clause 6.3.g., the disclosing Party must notify the other Party in writing as soon as practicable prior to disclosure.

6.5 Except as otherwise may be agreed in writing, all Confidential Information shall remain confidential until it becomes available from a legal public source without restriction.

6.6 Nothing in this MoU derogates from any other obligation a Party may have at law, or under any deed or agreement, in respect to confidentiality, privacy, protection of Personal Information, security or information protection

6.7 This clause 6 shall survive the termination of this MoU.

---

7. Independence

7.1 This MoU does not:

a. create a partnership, agency, or employment relationship between the Parties

b. authorise one Party to act on behalf of the other or bind the other Party to any obligation.

7.2 Each Party retains full discretion to carry out its respective statutory functions and duties independently of the other Party.

---

8. Meetings and Communication

8.1 The Parties will hold regular meetings, as agreed, to:

a. discuss progress and findings from the age assurance technology trial

b. identify opportunities for further collaboration and information sharing.

8.2 Any communications or notices related to this MoU will be sent to the Contact Officers named at Items 2 and 3 of the Schedule. Either Party may change its Contact Officer by giving written notice to the other Party.

---

9. Review and Amendment

9.1 This MoU may be reviewed periodically, as mutually agreed by the Parties, to ensure its continued relevance and effectiveness.

9.2 Amendments to this MoU must be made in writing and signed by authorised representatives of both Parties.

---

10. Termination

10.1 Either Party may terminate this MoU by providing 30 days' written notice to the other Party.

10.2 Upon termination, the Parties will cease to share information under this MoU and will continue to respect the confidentiality obligations outlined in Clause 6.

---

11. Signatories

By signing below, the Parties acknowledge their understanding and intent to cooperate as outlined in this MoU.

For the eSafety Commissioner:

SIGNED, SEALED and DELIVERED for and on behalf of the Commonwealth of Australia as represented by the eSafety Commissioner by:)

s 22

Name of signatory

s 22

Signature

For Avid Certification Services Ltd:

SIGNED, SEALED and DELIVERED by Avid Certification Services Ltd in accordance with the requirements of section 127 of the *Corporations Act 2001* (Cth) by:)

Tony Allen

Name of Director

Tony Allen

Tony Allen (Feb 13, 2025 09:06 GMT)

Signature

And by:

s 47F

Name of Director/Secretary

s 47F

s 47F (Feb 13, 2025 09:07 GMT)

Signature of Director/Secretary

SCHEDULE 1 MOU DETAILS

1. Commencement and Term

Commencement Date

The date this MoU has been signed by both Parties.

Expiry Date

The date AVID delivers its Final Report on the Age Assurance Technology Trial to the Department of Transport, Infrastructure, Regional Development, Communications and the Arts.

2. eSafety Details

Name	Commonwealth of Australia as represented by the eSafety Commissioner	
Address:	Level 5, 65 Pirrama Road, Pyrmont NSW 2009	
Postal address (if different to office address):	PO Box Q500, Queen Victoria Building, NSW 1230	
Contact Officer	**Name:**	s 22
	Telephone number:	s 22
	Email address:	s 22 @eSafety.gov.au

3. AVID Details

Name	Avid Certification Services Ltd	
Address:	Unit 321B Broadstone Mill, Broadstone Road, Stockport, Cheshire, England, SK5 7DL	
Postal address (if different to office address):		
Contact Officer	**Name:**	Tony Allen
	Telephone number:	s 47F
	Email address:	s 47F @ACCScheme.com

From: Tony Allen s 47F @accscheme.com>
Sent: Friday, 21 February 2025 9:52 AM
To: s 22
Cc: s 22
Subject: Re: Memorandum of Understanding - eSafety AVID [SEC=OFFICIAL]

Hi s 22

Excellent. That's all in place and sorted now then.

Tony

From: s 22 @eSafety.gov.au>
Sent: 20 February 2025 10:49 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Memorandum of Understanding - eSafety AVID [SEC=OFFICIAL]

OFFICIAL

Hi Tony

Hope you're well! Just following on from s 22 's email below – I've received and signed the digital version (as attached).

Thanks!
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: s 22 s 22 @esafety.gov.au>
Sent: Wednesday, 19 February 2025 2:05 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>
Subject: Memorandum of Understanding - eSafety AVID [SEC=OFFICIAL]

OFFICIAL

Hi Tony,

I hope this email finds you well.

I wanted to reach out regarding the Adobe copy for electronic signature. s 22 has not received it yet.

We have scanned a copy that includes s 22 signature. Would you be willing to sign it and then scan it back to us?

Thank you for your assistance with this matter.

Kind Regards

s 22

s 22

eSafety acknowledges all First Nations people for there continuing care of everything Country encompasses – land, waters and community. We pay our respects to First Nations People, and to Elders past and present.

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From: s 22
Sent: Friday, 14 March 2025 5:07 PM
To: Tony Allen
Cc: s 22 s 47E(d)
Subject: AATT & eSafety - Phase 2 Codes Update, Proposed Meeting, Summit [SEC=OFFICIAL]
Attachments: FW: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Hi Tony,

We hope you and the whole Age Assurance Trial team are well.

Phase 2 Codes developments

Following on from our February meeting about the Phase 2 Codes, we wanted to provide you and the team with an update on the code development process.

On 28 February, eSafety received seven Phase 2 Codes developed by the online industry for assessment, as well as head terms to the Codes. We note that the Commissioner granted an extension for the return of the code relating to App Distribution Services which is now due by 28 March. The Phase 2 Codes submitted by industry are available online for perusal. We note they include measures which have been proposed by industry relating to age assurance.

Given this development, we thought it might be useful for our teams to reconnect and share updates, and perhaps establish a standing meeting for this purpose as well. Would members of the AATT team be available for a catch up in either the weeks commencing 24 or 31 March 2024? A timeslot of 7pm AEDT / 8am GMT might be kindest to all involved, with apologies that it is still fairly early on your end!

Global Age Assurance Standards Summit

On a slightly different but related matter, my colleague s 22 has also been in touch with the ACCS team about the Commissioner delivering a remote keynote at the Summit in April (email chain attached). Would you be able to provide us with any details about the proposed slot for the presentation at the Summit?

Many thanks and kind regards,
s 22

s 22

From: Tony Allen s 47F @accscheme.com>
Sent: Tuesday, 25 March 2025 11:35 PM
To: Julie Inman Grant
Cc: s 22
Subject: Re: Age Assurance Conference speech [SEC=OFFICIAL]

Hi Julie,

Sorry about any mixed messages from our team. As you can imagine, its all very fraught as we're just two weeks out!

Put simply, its up to you. You can present live on the Ring Central Events platform, pre-record or hold a Q&A. It is an early slot so the live option may be there as it won't be too late. I think s 22 and I agreed to a prerecord last year because the slot would have been 2am for her to do it live.

You have some options for slots. You are currently in on Thursday 10th at 09:30 CET. You will be immediately after Collective Shout, but you are not up against anyone else from the Department. The Australia National Delegation meeting is on Wednesday at 09:00 (CET). We could put you on at 09:00 CET on the Thursday (but then you would be up against Collective Shout) or alternatively there is a slot at 10.00 CET on the Tuesday (8th) available.

BTW, thank you for your response on the expectations of regulators issue with age assurance system designs. I'm keeping an eye on that.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 25 March 2025 2:35 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Age Assurance Conference speech [SEC=OFFICIAL]

OFFICIAL

Hi Tony - I honestly don't know how you are keeping so many balls in the air, Tony, so I'm sorry to bother you with something so trivial but we want to bottom out with you how I could provide value to your upcoming conference in Amsterdam. We have had a couple of contradictory asks so I thought I would ask you directly what would be ideal from your perspective. The first ask was for a pre-recorded video which we would have to move on quickly to script and get a crew in – unless you wanted to do the Q & A style like you did with s 22 last year. The other, more recent ask, was to deliver a live 25 minute address but I understand this would be in the same time slot (ie competing with) my colleagues at the Department, which I do not think would be ideal. While we have different roles and functions, if you'd like us both to speak, I think it would be better if it were "sequential" and part of one overall presentation rather than "duelling", so to speak!

I hope that makes sense and let me know your preference and we will aim to deliver!

All the best,

Julie

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From: s 47F @accscheme.com>
Sent: Tuesday, 1 April 2025 12:29 AM
Cc: s 47F
Subject: Urgent - Global Age Assurance Standards Summit

Importance: High

Hi,

As you are speaking at the Global Age Assurance Standards Summit – please can you ensure to register as soon as possible for the event if you haven't already - https://events.ringcentral.com/events/global-age-assurance-standards-summit-2025
We need to create your profile as a speaker to attach you to the session so you can receive your link to join the session as a speaker – you cannot speak at the event unless you have been created as a speaker, so it is important you do this as soon as possible!

My colleague s 47F will have sent you an email asking for the following details – Email, Headline, Bio, Website link and a photo of yourself will also need to be uploaded. Please can you fill these in on your RingCentral account or alternatively send these via email and we can assist in uploading these for you.

Thanks,

s 47F

Executive Assistant

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK

From: s 47F @accscheme.com>
Sent: Tuesday, 1 April 2025 5:25 PM
To: s 22
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Hi s 22

That's ok, great. 😊 Yes, there are only a few gaps across the 3 days now, very exciting!

Just in terms of the session, we currently have this as the overview. **Do let me know if this text won't suit the presentation/ what text you would like inputting online, thank you.**

In this bitesize session, the **eSafety Commissioner of Australia** will provide an overview of the country's evolving approach to **age assurance as a pillar of online safety**.

The session will highlight:

- The **regulatory role** of the eSafety Commissioner in promoting safer online environments for children and young people.
- Australia's commitment to **risk-based, privacy-conscious age assurance** that aligns with global standards while addressing local needs.
- Insights from the **Age Assurance Technology Trial**, including stakeholder engagement, co-design with children and families, and lessons learned from testing emerging technologies.
- How eSafety is working with government, industry, and international partners to shape a **rights-respecting, inclusive, and practical framework** for age assurance.

This briefing offers delegates a concise but impactful view into how Australia is embedding age assurance within a broader **child-centred, harm-reduction strategy**, while balancing innovation, inclusion, and digital rights.

PLEASE NOTE: Due to the pending Federal Election in Australia and the current Caretaker Government arrangements that are in place, the content of these sessions will be limited to existing materials and knowledge in the public domain.

Many thanks,
s 47F

From: s 22 @esafety.gov.au>
Sent: Tuesday, April 1, 2025 7:21 AM
To: s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F ,

No worries and sorry, that miscommunication may have been me in my email! I just meant that to confirm we've got the time blocked, so can give you the confirmation.

Great to see the schedule filling out – it looks like it will be interesting to tune in!

Thanks,
s 22
s 22

From: s 47F @accscheme.com>
Sent: Tuesday, 1 April 2025 5:13 PM
To: s 22 @esafety.gov.au>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Thanks so much s 22

Apologies if I've missed a communication somewhere, I didn't know it had been confirmed.

Many thanks,
s 47F

From: s 22 @esafety.gov.au>
Sent: Tuesday, April 1, 2025 12:28 AM
To: s 47F @accscheme.com>; s 47F @accscheme.com>
Cc: Tony Allen s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

That slot is confirmed in the Commissioner's calendar. I've passed on the information about the speaker profile and account and her office will provide that information shortly.

Thanks,
s 22

s 22

From: s 47F @accscheme.com>
Sent: Tuesday, 1 April 2025 12:19 AM
To: s 22 @esafety.gov.au>; s 47F @accscheme.com>
Cc: Tony Allen s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Hi s 22

We are finalising the schedule/ making last minute additions/ changes and would love to know whether you can confirm the participation of the eSafety Commissioner on **Thursday 10th April at 9:30am CET.**

Hope to hear from you very soon.

Best wishes,
s 47F

From: s 47F
Sent: Friday, March 21, 2025 8:15 AM
To: s 22 @esafety.gov.au>; s 47F @accscheme.com>
Cc: Tony Allen s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Hi s 22

No worries at all – look forward to your follow up shortly.

Thank you! It's certainly a busy time!

Best,
s 47F

From: s 22 @esafety.gov.au>
Sent: Thursday, March 20, 2025 10:30 PM
To: s 47F @accscheme.com>; s 47F @accscheme.com>
Cc: Tony Allen s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

I am still waiting on confirmation from the Commissioner's team. I will follow up to confirm.

Otherwise, hope all is going well in the planning – I am looking forward to the (virtual) event!

Thanks,
s 22

s 22

s 22 [redacted]

From: s 47F [redacted]@accscheme.com>
Sent: Thursday, 20 March 2025 7:29 PM
To: s 22 [redacted]@esafety.gov.au>; s 47F [redacted]@accscheme.com>
Cc: Tony Allen s 47F [redacted]@accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Hi s 22 [redacted]

I hope you're well. Just wanted to follow up on my message below as the Summit fast approaches!

Are you able to take the 9:30am slot for your presentation on Thursday 10th April?

Many thanks,
s 47F [redacted]

s 47F [redacted]

From: s 47F [redacted]
Sent: Monday, March 17, 2025 8:15 AM
To: s 22 [redacted]@esafety.gov.au>; s 47F [redacted]@accscheme.com>
Cc: Tony Allen s 47F [redacted]@accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Hi s 22 [redacted],

No need to apologise at all! It's good to hear from you.

If you are available, we believe **Thursday 10th April at 9:30AM Amsterdam time** would suit the eSafety's presentation.

This slot falls after a presentation from Collective Shout and we'll also be hearing from campaign groups, charities and not-for-profits on this day,

Would you be presenting remotely? I think this would fall at 7:30pm your time if so.

I look forward to hearing from you.

Best wishes,
s 47F

s 47F

From: s 22 @esafety.gov.au>
Sent: Tuesday, March 11, 2025 12:27 AM
To: s 47F @accscheme.com>; s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F ,

Apologies for the long time between emails!

I was hoping to get some more details from you about the Summit. I can see that there is a now a schedule available online, but do you have more specific information about where eSafety's presentation would be placed?

Any information you can provide would be helpful!

Thank you,

s 22

From: s 47F @accscheme.com>
Sent: Tuesday, 7 January 2025 8:58 PM
To: s 22 @esafety.gov.au>

Cc: s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

> You don't often get email from s 47F @accscheme.com. Learn why this is important

Hi s 22

Yes, that's fine no problem.

If you could provide a keynote, that would be great! Do you have an idea of the title/any more details?

Thanks,

s 47F

Executive Assistant

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

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AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK

From: s 22 @esafety.gov.au>
Sent: 07 January 2025 02:47
To: s 47F @accscheme.com>
Subject: RE: Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Hi s 47F,

I am emailing about the request for the eSafety Commissioner to provide a keynote during one of the plenary sessions. Can we please confirm if it's possible to accommodate for a pre-record or live video presentation, and is it possible to get a more detailed copy of the program / draft session list? Understanding that it might not be finalised yet!

Thank you,
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: s 47F @accscheme.com>
Sent: Tuesday, December 17, 2024 9:14 PM
Subject: Global Age Assurance Standards Summit 2025

You don't often get email from s 47F @accscheme.com. Learn why this is important

Hi,

I am contacting you because we think you may be interested in attending our next Global Age Assurance Standards Summit which is taking place 8-10th April 2025 in Amsterdam.

I have attached a copy of the national delegations brochure, which has now been published!
We're looking to secure delegations ahead of the summit and we would greatly appreciate your help in finding the right people to fill these roles within your delegation country, if you could direct me to them or them to me, it would be greatly appreciated!

We're looking for each country to have all these delegation roles filled, with the idea that each country has a team of the following delegations.... (more details in the attached brochure)

- **A Head of Delegation -** Someone with the National Gravitas to coordinate the delegation throughout the Summit. We would also welcome the appointment of a deputy head of delegation.
- **Privacy or Data Regulators Privacy or Data Regulators -** Delegate(s) from National Regulators responsible for Data Protection & Privacy Laws Delegate(s) from National Regulators responsible for Data Protection & Privacy Laws
- **Content Regulators -** Delegate(s) from National Regulators for Online Safety, Harms or Content
- **Age Restricted Product Regulators -** Delegate(s) for Regulation of Restricted Products (like Alcohol, Tobacco, Weapons, etc)
- **National Standards Bodies -** Delegate(s) from National Standards Bodies – such as ISO/IEC P-Members
- **National Accreditation Bodies -** Delegate(s) from National Accreditation Bodies (such as IAF, ILAC Member Bodies)
- **Age Assurance Policy Leaders -** Delegate(s) from National Government Departments responsible for Age Assurance Policy & Leadership
- **Police/CSAM/ Law Enforcement** - Delegate(s) from Police or Bodies Responsible for tackling Child Sexual Exploitation or Abuse

- **Top Relying Parties** - Delegate(s) from the Top 3 or 4 National Businesses that use or want to use age assurance services
- **Non-Governmental Organisations** - Delegate(s) from NGOs with particular policy interest in age assurance
- **Age Assurance Service Providers -** Delegate(s) from AASPs based in the country
- **Other Interested Parties Any other -** Delegate(s) that, in the opinion of the Head of Delegation, can add value to the discussion and debate about age assurance standards & policy

if you have any questions, please don't hesitate to ask! We look forward to hopefully seeing you at the Global Age Assurance Standards Summit in April!

Many thanks,

s 47F

Executive Assistant

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

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AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK

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From: s 22
Sent: Monday, 7 April 2025 8:33 AM
To: s 47F
Subject: RE: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Thanks s 47F

I will forward this to the Commissioner and her team. I believe they have set Julie up with an account and a speaker profile, but please let me know if we need to provide anything further!

I think Julie will also have slides to support her speech. Are there any tech guides/ info sheets on presenting available for Ring Central?

Thank you,
s 22

s 22

From: s 47F @accscheme.com>
Sent: Friday, 4 April 2025 7:31 PM
To: s 22 @esafety.gov.au>
Subject: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025
Importance: High

Dear s 22 ,

We're very much looking forward to welcoming you to the Global Age Assurance Standards Summit next week and are delighted that you will be joining us as a speaker!

Ahead of your session please see below for your magic link. You don't need to click on this link until it's time for you to present. This will then give you access to present/being a speaker instead of joining as the other attendees.

Just to confirm, your session is **– Thursday 10th April at 9:30AM CET in Mini Theatre #2 (St Gallen).**

https://events.ringcentral.com/sessions/04f7c415-3a21-4aa8-b84a-fd26b57666f5/speakers/fkG7XG4ZUeZfyx0iLmgxKCrKA/invitation?token=a3FBcmhtWXFkd0FWMFZoM1NORVZ3UjJSU2hkV3YwZC9ydWpZVnhxbFNNRVVWSktTLzF3OFQ5czJYNER6RVJnRUtBVGw4bXIydU9NaVBHTENuQm1mKzRQUFlsWTVWSWhsZ01rLzZlVEtjeC9ha01kd0lNTHQ3RElTTHhtL2h2

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Please make sure to keep this email as you will need the link above to connect to your session on the day – without using this link to join, you won't have access to presenting.

Kind regards,
s 47F

s 47F

From: s 22
Sent: Tuesday, 8 April 2025 12:23 PM
To: s 47F
Subject: RE: Interviews - Global Age Assurance Standards Summit [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

Hope you are also well!

Thank you for passing that request on. s 47F has also reached out to eSafety's media team and they will respond and coordinate any follow up directly.

Thanks!

s 22

From: s 47F @accscheme.com>
Sent: Friday, 4 April 2025 6:46 PM
To: s 22 @esafety.gov.au>
Subject: Interviews - Global Age Assurance Standards Summit
Importance: High

Hi s 22 ,

Hope you're well.

s 47F , a Data privacy and security reporter from Mlex (www.mlex.com) is interested in interviewing you at some point during the Global Summit next week, would this be of interest to you?

If you could let me know, ideally as soon as to make arrangements on timings, that would be great!

Kind regards,

s 47F

Executive Assistant

s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK

From: s 22
Sent: Thursday, 10 April 2025 2:07 PM
To: s 47F '
Subject: RE: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Good morning s 47F

Hope all is going well with the summit! I just wanted to confirm if we provide the slides to the ACCS facilitator ahead of time so they can operate the slides while Julie is speaking? If so, is there someone we should email them to?

Thanks!
s 22

From: s 22
Sent: Tuesday, 8 April 2025 11:34 AM
To: s 47F @accscheme.com>
Subject: RE: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Thanks so much s 47F

I've just popped into the Ring Central to have a look and can see that I am listed as a speaker. Just to confirm – the presentation will just be Julie Inman Grant, the eSafety Commissioner. Grateful if you could please remove me from the session as a speaker.

Great to know there will also be support in the room. Will we provide the slides by email ahead of time?

Thanks again,
s 22

s 22

s 22

From: s 47F @accscheme.com>
Sent: Monday, 7 April 2025 5:05 PM
To: s 22 @esafety.gov.au>
Subject: RE: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

Hi s 22

No worries at all. I think each link is individualised so we're going to have to set a link up for Julie to use.

One of the ACCS Team will be a room facilitator for Julie's session, including figuring out the backstage on Ring Central, so they will be able to stream the slides on the day.

Thank you,
s 47F

From: s 22 @esafety.gov.au>
Sent: Sunday, April 6, 2025 11:33 PM
To: s 47F @accscheme.com>
Subject: RE: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025 [SEC=OFFICIAL]

OFFICIAL

Thanks s 47F

I will forward this to the Commissioner and her team. I believe they have set Julie up with an account and a speaker profile, but please let me know if we need to provide anything further!

I think Julie will also have slides to support her speech. Are there any tech guides/ info sheets on presenting available for Ring Central?

Thank you,
s 22

s 22

From: s 47F @accscheme.com>
Sent: Friday, 4 April 2025 7:31 PM
To: s 22 @esafety.gov.au>
Subject: IMPORTANT - Speaker Information - Global Age Assurance Standards Summit 2025
Importance: High

Dear s 22

We're very much looking forward to welcoming you to the Global Age Assurance Standards Summit next week and are delighted that you will be joining us as a speaker!

Ahead of your session please see below for your magic link. You don't need to click on this link until it's time for you to present. This will then give you access to present/being a speaker instead of joining as the other attendees.

Just to confirm, your session is **– Thursday 10th April at 9:30AM CET in Mini Theatre #2 (St Gallen).**

https://events.ringcentral.com/sessions/04f7c415-3a21-4aa8-b84a-fd26b57666f5/speakers/fkG7XG4ZUeZfyx0iLmgxKCrKA/invitation?token=a3FBcmhtWXFkd0FWMFZoM1NORVZ3UjJSU2hkV3YwZC9ydWpZVnhxbFNNRVVWSktTLzF3OFQ5czJYNER6RVJnRUtBVGw4bXIydU9NaVBHTENuQm1mKzRQUFlsWTVWSWhsZ01rLzZlVEtjeC9ha01kd0lNTHQ3RElTTHhtL2h2WDN0SVhaWkNBQTVuT2s1MU50T0cxNy9vdGQ3TEJPdWhaM0RSU05Edm9HOENBQkJRPT0tLUEyd3NoSnZGN0lkbjlQL1otLUsxUzVtV2FiY1RtODFLWHFvcFBhMFE9PQ%3D%3D

Please make sure to keep this email as you will need the link above to connect to your session on the day – without using this link to join, you won't have access to presenting.

Kind regards,
s 47F

s 47F

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From: s 47F @accscheme.com>
Sent: Thursday, 17 April 2025 11:28 PM
Subject: Thank You for Your Contribution to the Age Assurance Global Summit

Hi,

On behalf of Tony and the rest of the team at ACCS, I wanted to extend a heartfelt thank you for attending and presenting at the Global Age Assurance Standards Summit in Amsterdam.

Your contribution as a speaker added tremendous value to the event, and we've received fantastic feedback from attendees who found your insights both engaging and inspiring. Your expertise helped make the event a real success, and we truly appreciate the time and effort you dedicated to being a part of it.

We hope you found the experience enjoyable and worthwhile, and that it provided meaningful opportunities to connect, share, and learn alongside peers in the industry.

Thank you again for your support—we're grateful for your involvement.

Best wishes,
s 47F

s 47F

From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 21 April 2025 10:39 PM
To: Julie Inman Grant
Cc: s 22 ; s 47F ; s 47F ; s 22
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Absolutely, we've got a week next week of ploughing through lawyers and auditors on the draft observations!

Sent from my I-Phone

On 21 Apr 2025, at 20:29, Julie Inman Grant s 47E(d) @esafety.gov.au> wrote:

Always interesting reading, Tony. Thanks for sharing these in confidence and I hope you are okay with plenty of questions...

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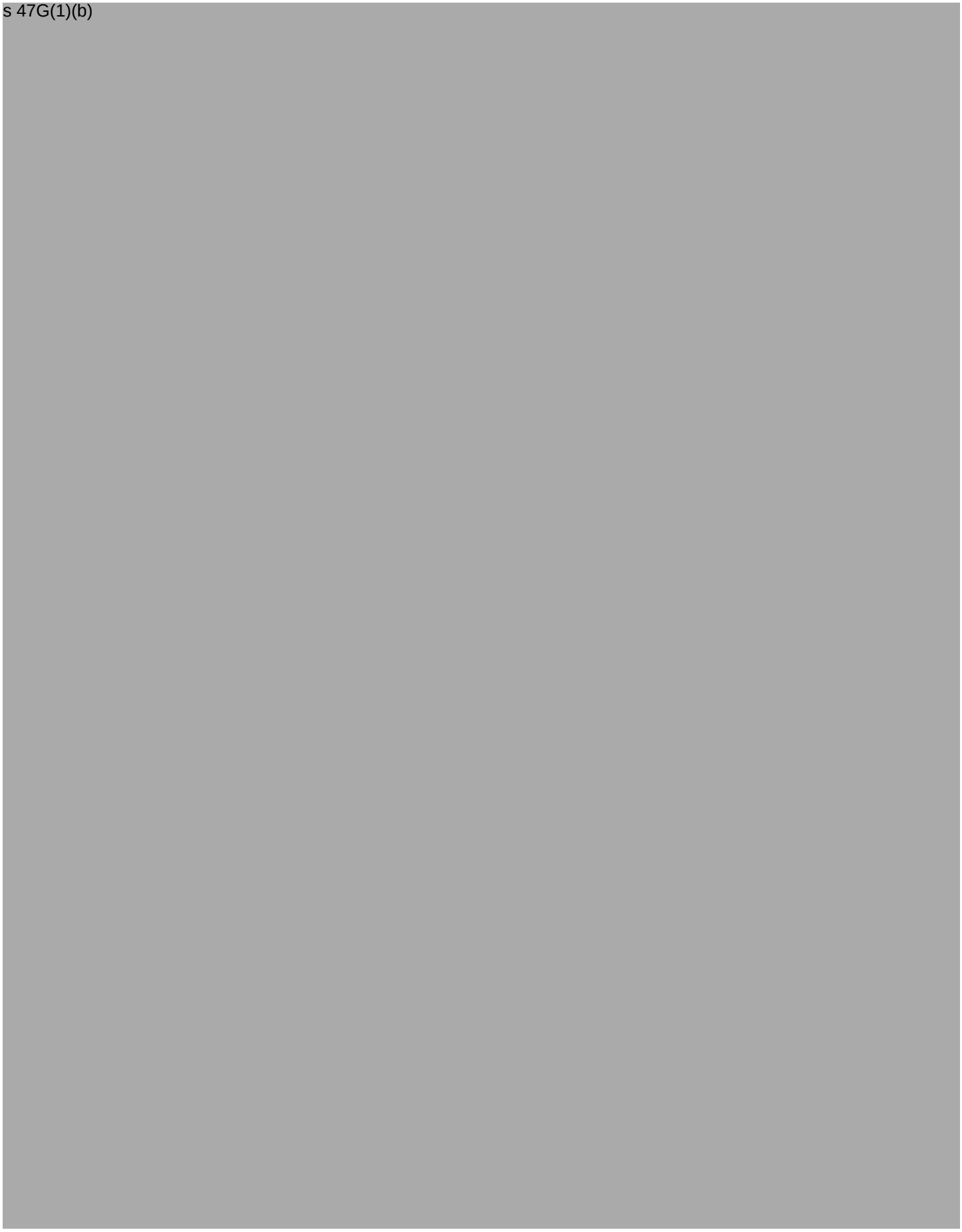
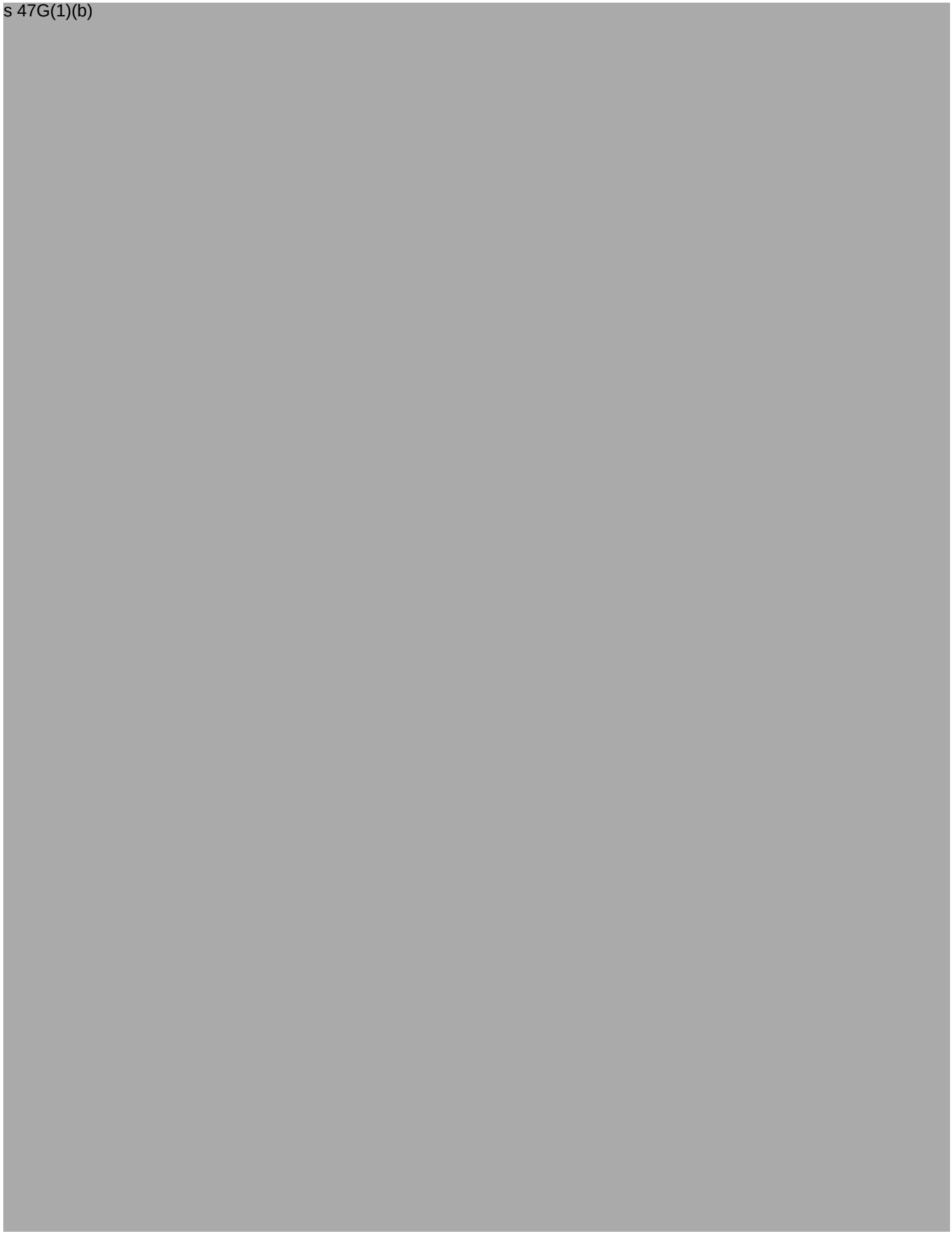
From: Tony Allen s 47F @accscheme.com>
Sent: Monday, April 21, 2025 3:40:03 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

s 47G(1)(b)

s 47G(1)(b)



s 47G(1)(b)



s 47G(1)(b)

[redacted]

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 13 April 2025 12:28 PM
To: Tony Allen s 47F @accscheme.com>

Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Great, Tony - we look forward to hearing more - and I think we can accommodate that very specific time frame!

I hope your conference went well - I am not sure how you keep so many ball's in the air!

See you soon and look forward to the preliminary report!

Julie

Get Outlook for iOS

From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, April 13, 2025 9:24:41 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Hi Julie,

We are getting towards a preliminary report. I plan to share with you the 14 themes/observations that we see emerging in a few days, but if possible I would like to come back to your Sydney offices to discuss them in more detail.

My next trip to Sydney is quite tight, but I wondered if you and/or your team would be able to accommodate me on Monday 28th April at 10:00am?

If it is OK, I will send over a meeting invite so that it is in schedules.

I will get an outline of where we are up to over to you in advance.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 21 March 2025 8:22 AM

To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

No problems at all, Tony. I hope the trial is going well!

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From: Tony Allen s 47F @accscheme.com>
Sent: Friday, March 21, 2025 6:13 pm
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

Hi Julie,

Thank you for your swift reply on this issue and everything you've said is understood. I'll keep an eye on this issue as we continue with the vendor interviews.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 20 March 2025 6:11 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

OFFICIAL

Hello Tony:

Thank you for raising this issue with me and seeking eSafety's views.

s 47G(1)(b)

All the best,

Julie

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Subject: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems

Hi Julie,

I hope that you and the eSafety Team are well.

s 47G(1)(b)

s 47G(1)(b)

Best Regards

Tony

<image001.jpg>

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F @accscheme.com

<image002.png>
s 47F |
<image003.png>
s 47F @accscheme.com |
<image004.png>
www.accscheme.com |
<image005.png>
@agecheckcert

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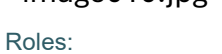
<image009.png>

https://www.linkedin.com/in/tonyallenctsp/



Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

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From: s 22
Sent: Thursday, 24 April 2025 6:00 PM
To: Tony Allen
Subject: Face to Face Meeting on Monday - Attendees [SEC=OFFICIAL]

OFFICIAL

Hi Tony

We are looking forward to seeing you on Monday and thank you so much for the invite.

When you arrive in the foyer of 65 Pirrama Road please contact me on s 22 and I will come and collect you.

Would you be able to provide details of any other attendees, and I will put them into our system.

Thank you so much and have lovely weekend.

Kind regards

s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

Subject: Age Assurance Technology Trial - Preliminary Report Discussion
Location: in-person at the eSafety HQ at 65 Pirrima Road Pyrmont, Sydney NSW

Start: Mon 28/04/2025 10:00 AM
End: Mon 28/04/2025 11:00 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Tony Allen

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 326 127 193 667 1

Passcode: vd6cP9zR

For organisers: Meeting options

From: s 22
Sent: Monday, 28 April 2025 5:07 PM
To: Tony Allen; s 47F
Cc: s 22
eSafety Commissioner;
s 47E(d)
Subject: RE: Age Assurance Technology Trial - Preliminary Report Discussion [SEC=OFFICIAL]
Attachments: Meeting 28.04.25 - Questions for AATT.docx

OFFICIAL

Dear Tony and team

Thank you again for making the time to meet with us about the observations for the interim report.

As discussed please see attached some questions from our team about the observations. Many of these queries were covered at least in part in the meeting this morning, but we thought it might assist you to have the full document in case there were any extra details you wanted to add.

Wishing you the best of luck in getting the interim report done this week!
s 22

s 22

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-----Original Appointment-----
From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, 13 April 2025 9:30 PM
To: Tony Allen; s 22 s 47F ; s 22 Julie Inman Grant; s 47F ; s 22
Subject: Age Assurance Technology Trial - Preliminary Report Discussion
When: Monday, 28 April 2025 10:00 AM-11:00 AM (UTC+10:00) Canberra, Melbourne, Sydney.
Where: in-person at the eSafety HQ at 65 Pirrima Road Pyrmont, Sydney NSW

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 326 127 193 667 1

Passcode: vd6cP9zR

For organisers: Meeting options

From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, 18 May 2025 7:54 PM
To: Julie Inman Grant
Cc: s 22 ; s 47F ; s 22
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]
Attachments: D-5.3 - Preliminary Report [Final].pdf

Dear Julie,

Thank you to you and the team for all of your comments and suggestions in relation to our preliminary report. As promised, our report has been through our initial internal 'challenge' sessions with lawyers and our audit team; we have sought initial feedback from yourselves, OAIC and DITRDCA; and our team have been refining their analysis appropriately.

I am, therefore, please to be able to provide to you, in confidence, a final version of our Preliminary Report. s 47 G(1)(b)

We also recognise that there is plenty of opportunity for sub-editing, reducing repetition and improving the clarity of connections between sections and across aspects of the report. We will be addressing these in our final report, as well as further challenge sessions, quality assurance and pre-publication final checks.

In the meantime, however, please do not consider the attached as a final or settled position. We would still welcome any further feedback from you or your team as we continue to develop the final report.

Best Regards

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Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

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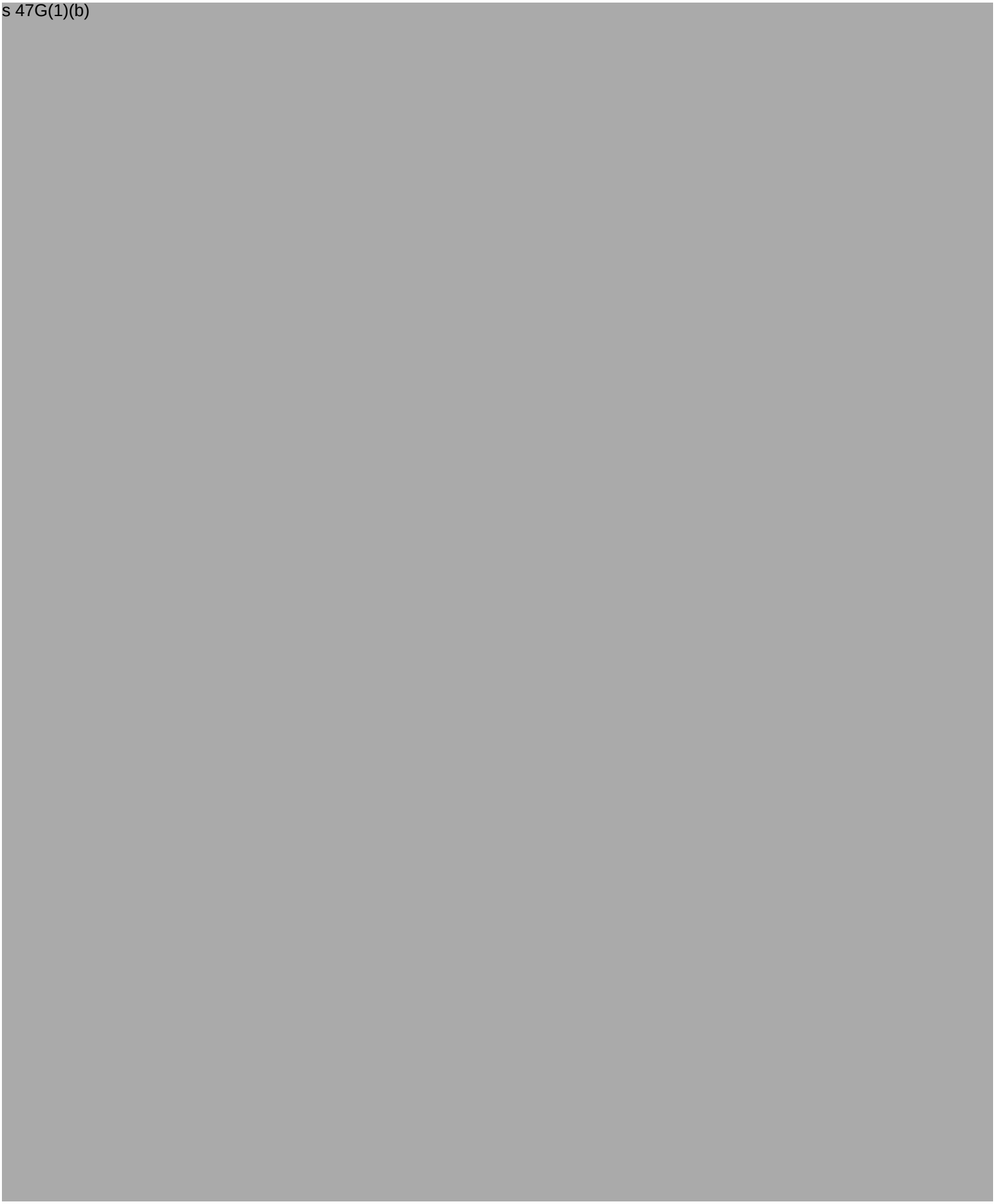
s 47G(1)(b)

s 47G(1)(b)

[redacted]

s 47G(1)(b)



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Great, Tony - we look forward to hearing more - and I think we can accommodate that very specific time frame!

I hope your conference went well - I am not sure how you keep so many ball's in the air!

See you soon and look forward to the preliminary report!

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My next trip to Sydney is quite tight, but I wondered if you and/or your team would be able to accommodate me on Monday 28th April at 10:00am?

If it is OK, I will send over a meeting invite so that it is in schedules.

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s 47G(1)(b)

s 47G(1)(b)

[redacted]

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F [redacted] @accscheme.com

s 47F [redacted] | s 47F [redacted] @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme | Age Appropriate Design Certification Scheme | Digital Identity Certification | Data & Privacy

https://www.linkedin.com/in/tonyallenctsp/

Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

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From: Tony Allen s 47F @accscheme.com>
Sent: Saturday, 7 June 2025 9:09 PM
To: Julie Inman Grant
Cc: s 22
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]
Attachments: Revised Preliminary Findings following Ethics Review - tracked changes.docx; DRAFT News Release - Prelminary Findings.docx

Hi Julie,

For now, I have cut down distribution of this to just you, s 22 and s 22 , but do please feel free to provide it to anyone internally that needs to know.

We have been asked by the Department for Infrastructure to aim for publication of our preliminary findings on Monday 23 June. We are planning to hold a stakeholder and participant briefing on the morning and then make the preliminary findings public thereafter. I understand that you are speaking at the Press Club on the 24 June.

I attach for you the draft press release that we intend to put out.

s 47G(1)(b)

It remains possible that they will change again! However, I think we are getting closer to having concrete findings to go into our final report. We remain on track to be able to share the 'word version' of that final report with the Department at the end of June and with you at the beginning of July. It is likely that full 'print-ready' publication will be towards the end of August.

Thank you for your ongoing assistance with this and, as ever, we always welcome your views and input.

Best Regards

Tony

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Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Thank you Tony. We look forward to reading the preliminary report and will let you know if we have and comments or questions!

Julie

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s 47G(1)(b)

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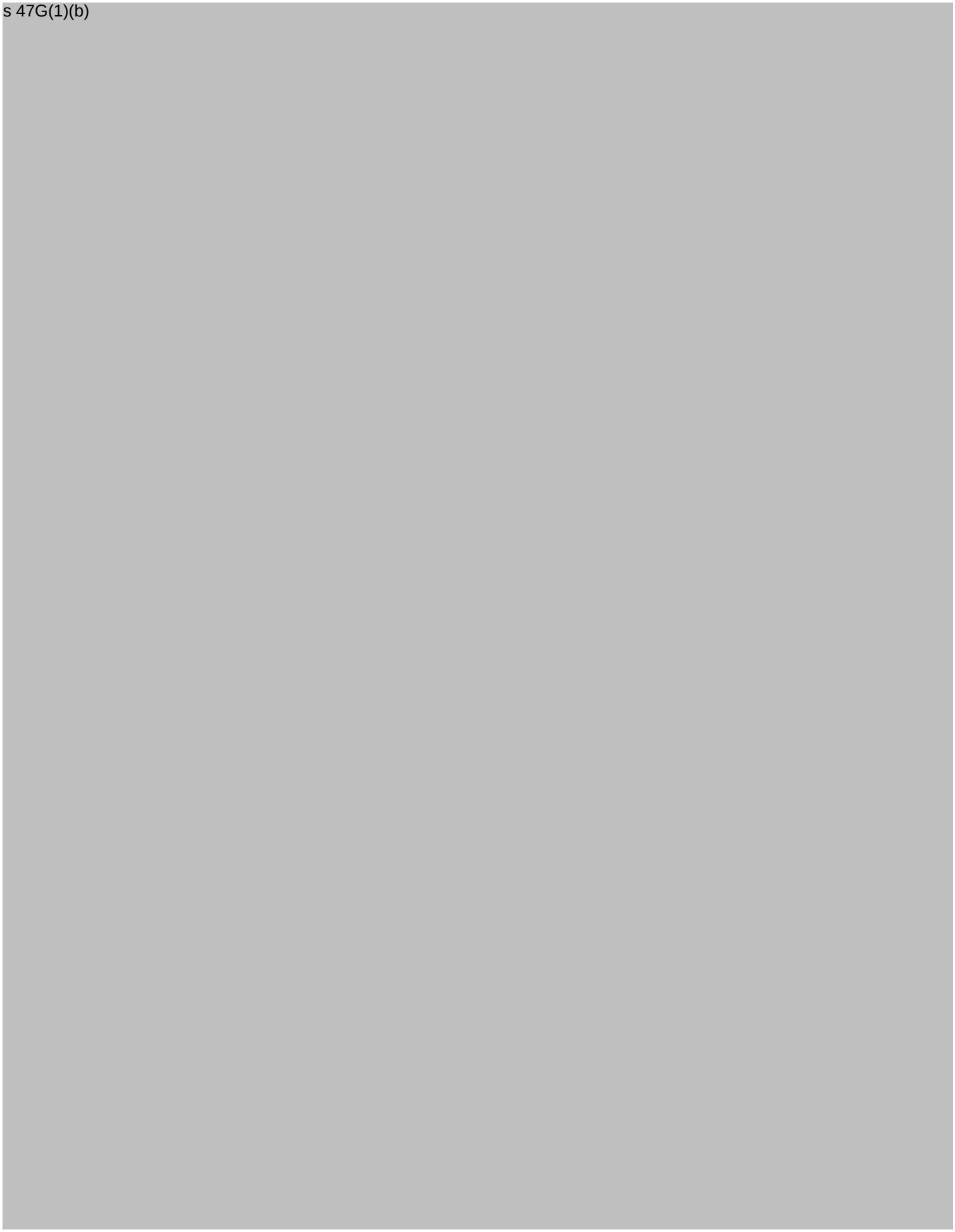

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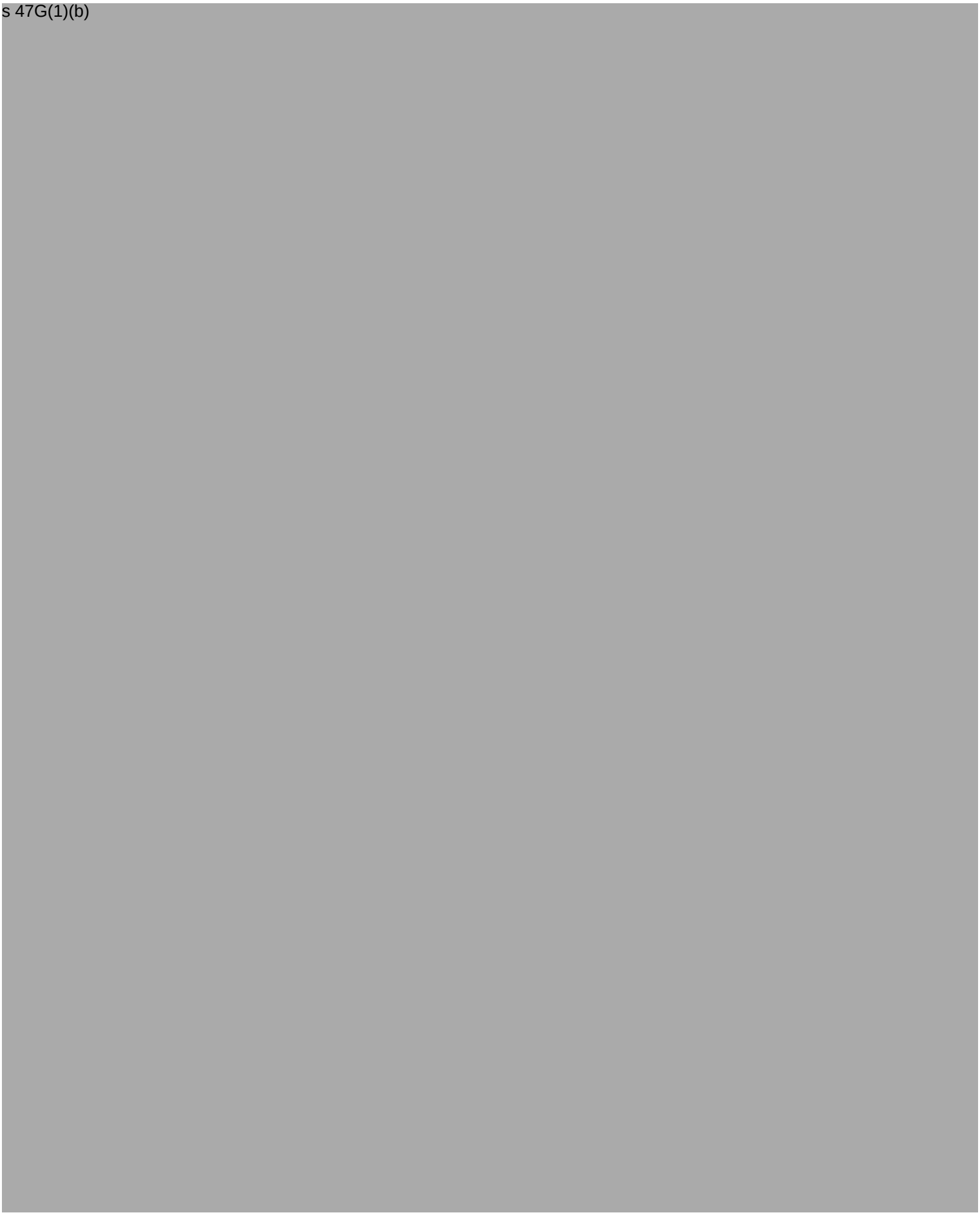

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Subject: RE: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

OFFICIAL

Hello Tony:

Thank you for raising this issue with me and seeking eSafety's views.

s 47G(1)(b)

All the best,

Julie

From: Tony Allen s 47F @accscheme.com>
Sent: Wednesday, 19 March 2025 7:26 PM
To: Julie Inman Grant <s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>
Subject: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems

Hi Julie,

I hope that you and the eSafety Team are well.

s 47G(1)(b)

[redacted]

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F @accscheme.com

s 47F | s 47F @accscheme.com | www.accscheme.com | @agecheckcert

Age Check Certification Scheme | Age Appropriate Design Certification Scheme | Digital Identity Certification | Data & Privacy

https://www.linkedin.com/in/tonyallenctsp/

Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

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From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, 15 June 2025 6:55 PM
To: Julie Inman Grant; s 22
Subject: AATT Share Folder

Hi Julie,

You will shortly receive an invitation to join a Share Folder within the AATT SharePoint environment. If that link does not work then try this link.

As we get towards the reporting stage, our files will become increasingly large and it is impractical to be sharing them by email attachment. It is important for us to establish this secure connection so that you and the team can see and review the files. Only you, s 22 and s 22 will be able to view them (at this stage). If we need anyone else at a later stage, you will need to let me know so that I can add them.

You may need to use Microsoft Authenticator to access the folder (this will depend on the eSafety Commissioner security settings for Microsoft cross-tenancy).

In the folder, you will find a dated draft version of the reports. s 47G(1)(b)

You and the team should feel free to add any comments that you want to the documents but note that they will change and quite rapidly over the next two weeks. So, when we upload another version to the share folder it will have a new date on it and we will email you to let you know a new version has been added. If you do add any comments on the draft, please can you let s 47F and I know and we can go in and review the comments/track changes, etc. The documents that you are seeing **are not** our working documents, so we will need to transpose them across. This will get more complex as we transition from Word to Indesign and PDF documents, but I'm hoping that this share process will keep up!

Similarly, I also propose to maintain a sharing system like this with the Government and the OAIC.

I trust all of that works for you. Please let me know if you have any difficulties.

Best Regards

Tony

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F @accscheme.com

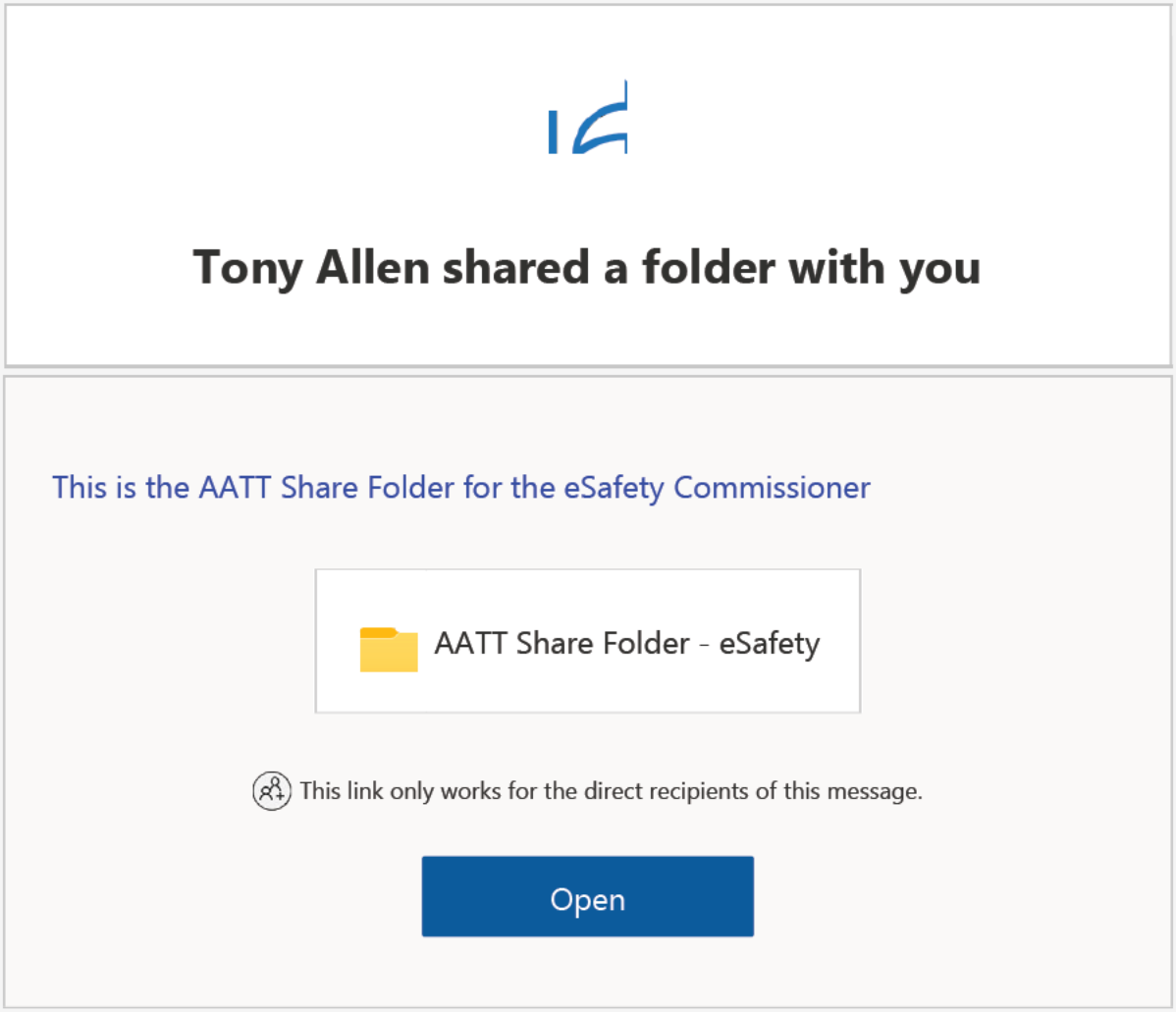
s 47F | s 47F @accscheme.com | www.accscheme.com | @agecheckcert

https://www.linkedin.com/in/tonyallenctsp/

Roles:

Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, 15 June 2025 6:55 PM
To: s 22
Subject: Tony Allen shared the folder "AATT Share Folder - eSafety" with you



This email is generated through Age Check Certification's use of Microsoft 365 and may contain content that is controlled by Age Check Certification.

From: Tony Allen s 47F @accscheme.com>
Sent: Monday, 16 June 2025 7:21 AM
To: Julie Inman Grant
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

s 47G(1)(b)

Tony

Sent from my I-Phone

On 15 Jun 2025, at 22:10, Julie Inman Grant s 47E(d) @esafety.gov.au> wrote:

s 47G(1)(b)

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From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, June 15, 2025 7:26 pm
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Hi Julie,

Thank you for your cooperation with all of this. In light of further discussion with the Department and with the Minister's Office, this is now the plan for the week ahead:

On Tuesday morning, we'll be issuing the attached News Planning Release. I will also be holding a briefing (verbal only) for the Stakeholder Advisory Board at 9.00am AEST on Tuesday.

On Thursday morning, we'll be issuing the embargoed news release attached. The embargo is until 14:00 AEST on Friday. We'll also be providing a copy of the embargoed news release to the stakeholder advisory board (also under embargo).

On Friday morning at 10.00am AEST, we'll be holding a participant and stakeholder virtual briefing session, where I will go through the 12 findings in some more detail.

At 14:00 on Friday, the embargo will be lifted and reporting can commence.

You are, of course, welcome to put out any comment that you wish to put out alongside this timetable, but you don't have to.

I hope that works around your plans for the week after.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 08 June 2025 4:59 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

I'll have s 22 weigh as our comms specialists in but even a day or two before the 23rd would be ideal! Thanks for understanding Tony and for seeking to work towards a solution. Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, June 8, 2025 1:29 pm
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @eSafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Hi Julie,

This date came from s 47F and team. We had initially suggested 25 or 26 June, but they felt it should be out prior to your speech.

I am pretty much ready to go with it, so we could suggest to them pulling it forward to the week before (maybe 18 June?)

Tony

Sent from my I-Phone

> On 7 Jun 2025, at 22:37, Julie Inman Grant s 47E(d) @esafety.gov.au> wrote:
>
> Tony - Thanks so much for letting us know. Is the 23rd set in stone and was it Andrew that tee'd this up? I ask because what typicallly happens with the Press Club is that we pre-brief the media on the 23rd on the

content of the speech, including a range of announceables so that many of the highlights are reported the morning of the address.

While we can always coordinate to the best of our ability, I believe this age assurance announcement deserves clear air. I would certainly want to ensure that all of our messages get out to the market and I think we can better guarantee that if this is staged with a bit more space.

I will plan to, of course, amplify all of these positive messages. We appreciate you keeping us across this.

Many thanks, Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Saturday, June 7, 2025 9:09 pm
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Hi Julie,

For now, I have cut down distribution of this to just you, s 22 , but do please feel free to provide it to anyone internally that needs to know.

We have been asked by the Department for Infrastructure to aim for publication of our preliminary findings on Monday 23 June. We are planning to hold a stakeholder and participant briefing on the morning and then make the preliminary findings public thereafter. I understand that you are speaking at the Press Club on the 24 June.

I attach for you the draft press release that we intend to put out.

s 47G(1)(b)

It remains possible that they will change again! However, I think we are getting closer to having concrete findings to go into our final report. We remain on track to be able to share the 'word version' of that final report with the Department at the end of June and with you at the beginning of July. It is likely that full 'print-ready' publication will be towards the end of August.

Thank you for your ongoing assistance with this and, as ever, we always welcome your views and input.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 18 May 2025 11:38 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Thank you Tony. We look forward to reading the preliminary report and will let you know if we have and comments or questions!

Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, May 18, 2025 7:54 pm
To: Julie Inman Grant <s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Dear Julie,

Thank you to you and the team for all of your comments and suggestions in relation to our preliminary report. As promised, our report has been through our initial internal 'challenge' sessions with lawyers and our audit team; we have

sought initial feedback from yourselves, OAIC and DITRDCA; and our team have been refining their analysis appropriately.

I am, therefore, please to be able to provide to you, in confidence, a final version of our Preliminary Report s 47G(1)(b)

We also recognise that there is plenty of opportunity for sub-editing, reducing repetition and improving the clarity of connections between sections and across aspects of the report. We will be addressing these in our final report, as well as further challenge sessions, quality assurance and pre-publication final checks.

In the meantime, however, please do not consider the attached as a final or settled position. We would still welcome any further feedback from you or your team as we continue to develop the final report.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 21 April 2025 1:29 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Always interesting reading, Tony. Thanks for sharing these in confidence and I hope you are okay with plenty of questions…

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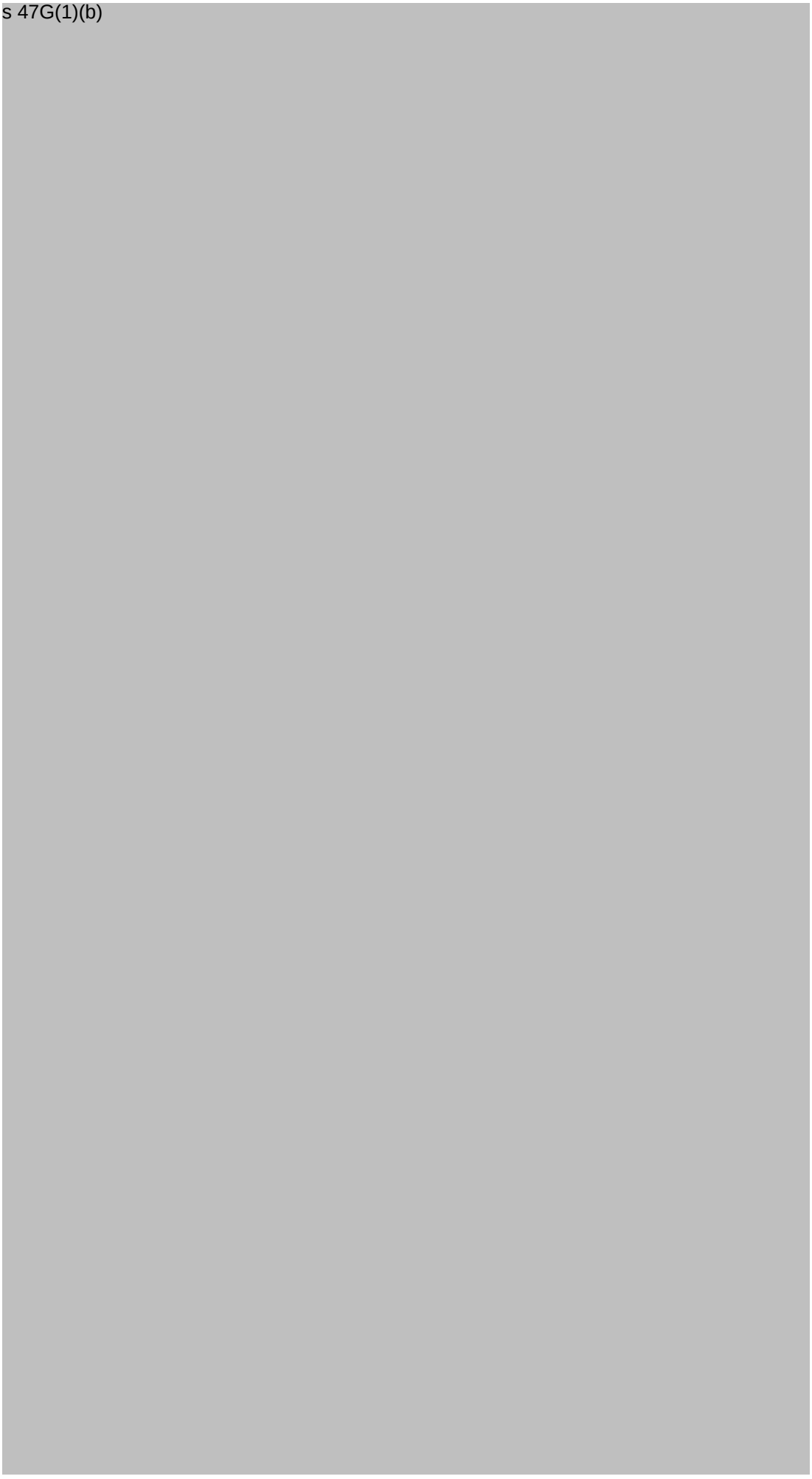
From: Tony Allen s 47F @accscheme.com>
Sent: Monday, April 21, 2025 3:40:03 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22

s 22 @esafety.gov.au>; s 22 @esafety.gov.au>;
s 22 @esafety.gov.au>; s 22
@eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

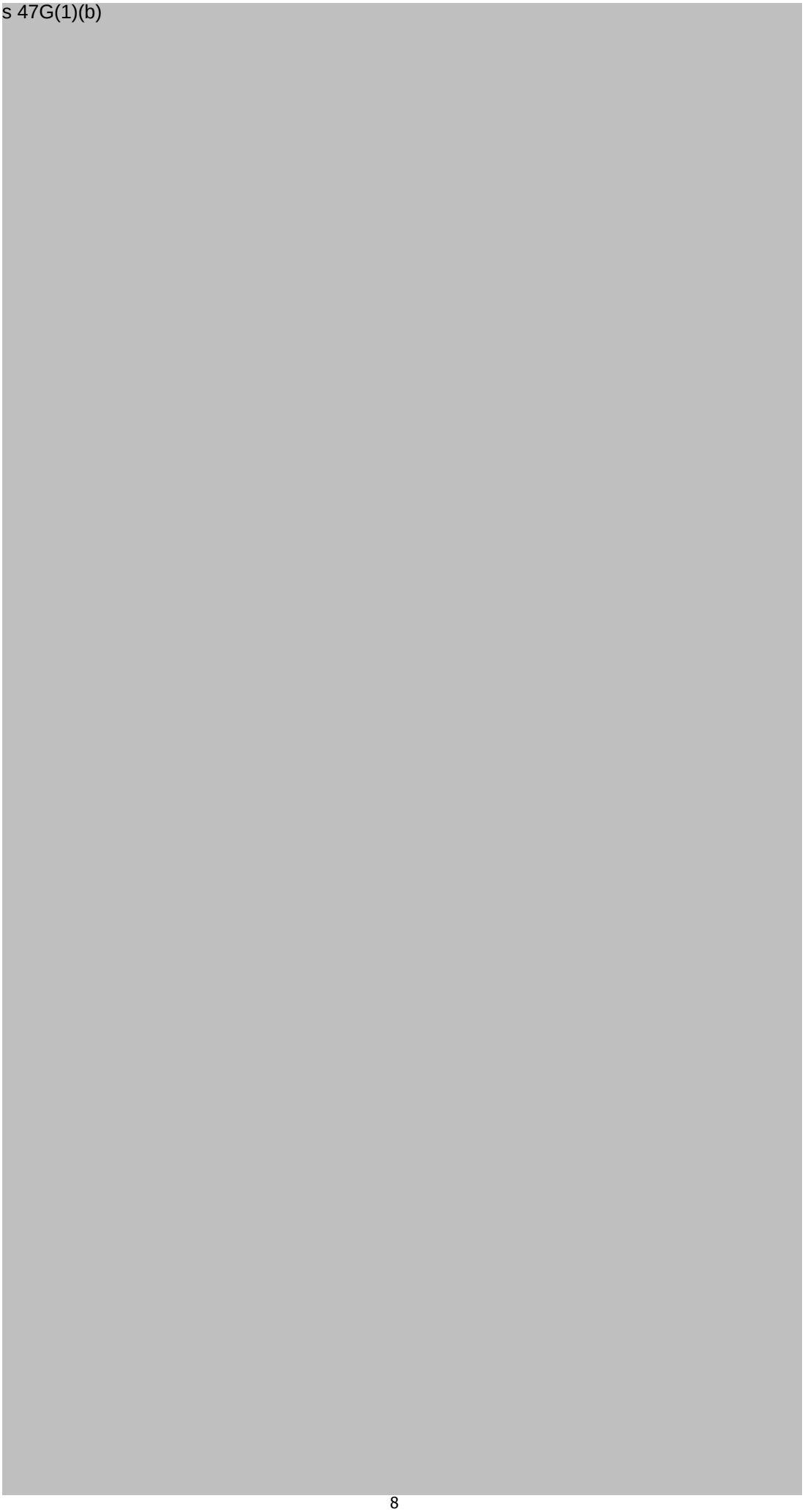
Hi Julie,

s 47G(1)(b)

s 47G(1)(b)



s 47G(1)(b)



s 47G(1)(b)

I hope that makes for interesting reading and I look forward to meeting with your team next Monday.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 13 April 2025 12:28 PM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Great, Tony - we look forward to hearing more - and I think we can accommodate that very specific time frame!

I hope your conference went well - I am not sure how you keep so many ball's in the air!

See you soon and look forward to the preliminary report!

Julie

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From: Tony Allen s 47F @accscheme.com>
Sent: Sunday, April 13, 2025 9:24:41 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 47F @avpassociation.com>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Preliminary Report [SEC=OFFICIAL]

Hi Julie,

We are getting towards a preliminary report. I plan to share with you the 14 themes/observations that we see emerging in a few days, but if possible I would like to come back to your Sydney offices to discuss them in more detail.

My next trip to Sydney is quite tight, but I wondered if you and/or your team would be able to accommodate me on Monday 28th April at 10:00am?

If it is OK, I will send over a meeting invite so that it is in schedules.

I will get an outline of where we are up to over to you in advance.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 21 March 2025 8:22 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

No problems at all, Tony. I hope the trial is going well!

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From: Tony Allen s 47F @accscheme.com>
Sent: Friday, March 21, 2025 6:13 pm
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 22 @eSafety.gov.au>; s 22

s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: Re: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

Hi Julie,

Thank you for your swift reply on this issue and everything you've said is understood. I'll keep an eye on this issue as we continue with the vendor interviews.

Best Regards

Tony

From: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Sent: 20 March 2025 6:11 AM
To: Tony Allen s 47F @accscheme.com>
Cc: s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>
Subject: RE: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems [SEC=OFFICIAL]

OFFICIAL

Hello Tony:

Thank you for raising this issue with me and seeking eSafety's views.

s 47G(1)(b)

s 47G(1)(b)

All the best,

Julie

From: Tony Allen s 47F @accscheme.com>
Sent: Wednesday, 19 March 2025 7:26 PM
To: Julie Inman Grant s 47E(d) @eSafety.gov.au>
Cc: s 22 @esafety.gov.au>; s 22 s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 47F @kjr.com.au>
Subject: Age Assurance Technology Trial - Capability for Regulatory Interrogation of Systems

Hi Julie,

I hope that you and the eSafety Team are well.

s 47G(1)(b)

s 47G(1)(b)

Best Regards

Tony

<image001.jpg>

Tony Allen

MSc | DTS | DMS | CTSP
Subject Matter Expert – Age & ID Assurance | Chartered Trading Standards Practitioner

Executive Assistant | s 47F @accscheme.com

<image002.png>
s 47F |
<image003.png>
s 47F @accscheme.com |
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<image005.png>
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<image007.png>

<image008.png>

<image009.png>

https://www.linkedin.com/in/tonyallenctsp/

<image010.jpg>

Roles:
Executive Director | Age Check Certification Scheme Ltd (11493870) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Executive Director | AVID Certification Services Ltd (14865982) | Unit 321 Broadstone Mill, Broadstone Road, Stockport, SK5 7DL, UK
Subject Matter Expert | Solicab Limited | (14838279) | 24 Bower Avenue, Hazel Grove, Stockport, SK7 6LG, UK
Director | euCONSENT ASBL | Numéro d'entreprise 0800678976 | Bld. Louis Schmidt 16, 1040 Etterbeek, Belgium
Technical Editor | ISO/IEC 27566 Information security, cybersecurity and privacy protection — Age assurance systems — Framework
Chair | UK Government Office for Product Safety & Standards | Expert Panel | Age Restrictions

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<Revised Preliminary Findings following Ethics Review - tracked changes.docx>

<DRAFT News Release - Prelminary Findings.docx>

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review, use, disclosure or distribution is prohibited. If you are not the
intended recipient, please contact the sender by reply email and destroy all
copies of the original message.

From: s 22
Sent: Friday, 20 June 2025 12:54 PM
To: Tony Allen
Cc: Julie Inman Grant; s 22
Subject: eSafety feedback on draft preliminary report [SEC=OFFICIAL:Sensitive]
Attachments: 20250620 - eSafety feedback on draft preliminary report.pdf

OFFICIAL: Sensitive

Hi Tony

Congratulations on reaching today's milestone of releasing preliminary findings from the trial, and thank you for providing eSafety a copy of the preliminary report for feedback. Please see attached our feedback, provided with the objective of informing your ongoing work on the final report.

Please let us know if you have any questions or would like to discuss.

Kind regards,
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

From: Tony Allen s 47F @accscheme.com>
Sent: Friday, 20 June 2025 5:07 PM
To: s 22
Cc: Julie Inman Grant; s 22
Subject: Re: eSafety feedback on draft preliminary report [SEC=OFFICIAL:Sensitive]

Some people who received this message don't often get email from s 47F @accscheme.com. Learn why this is important

Thanks s 22

That's great. Lots more still to come.

Tony

From: s 22 @eSafety.gov.au>
Sent: 20 June 2025 3:54 AM
To: Tony Allen s 47F @accscheme.com>
Cc: Julie Inman Grant s 47E(d) @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @eSafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>; s 22 @esafety.gov.au>
Subject: eSafety feedback on draft preliminary report [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

Hi Tony

Congratulations on reaching today's milestone of releasing preliminary findings from the trial, and thank you for providing eSafety a copy of the preliminary report for feedback. Please see attached our feedback, provided with the objective of informing your ongoing work on the final report.

Please let us know if you have any questions or would like to discuss.

Kind regards,
s 22

s 22

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

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From: Tony Allen s 47F @accscheme.com>
Sent: Tuesday, 1 July 2025 4:53 PM
To: s 22
Cc: s 22
Subject: Re: eSafety feedback on draft preliminary report [SEC=OFFICIAL:Sensitive]
Attachments: [PDF Draft 20250630] Combined Report.pdf

Hi s 22 ,

OK, let me look into that.

In the meantime, I attach them as a PDF. The attachment is missing Part B because there was a PDF error with that, which I am trying to fix.

Best Regards

Tony

From: s 22 @esafety.gov.au>
Sent: 01 July 2025 7:50 AM
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Cc: s 22 @eSafety.gov.au>
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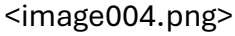

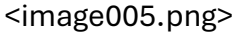

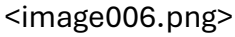

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OK, let me look into that.

In the meantime, I attach them as a PDF. The attachment is missing Part B because there was a PDF error with that, which I am trying to fix.

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