



Yoti Guardians Council Meeting 1 December 2020

Attendance: See Table at end
Date: 1-12-2020 1700-1930 GMT

Location: Yoti Office & VC
Recorder: Eric Levine

Agenda	<ul style="list-style-type: none"> ● Yoti Position under Covid ● Digital Identity regulatory shifts ● Yoti R&D updates ● ICO Sandbox & Age Appropriate Design Code 	<ul style="list-style-type: none"> ● Cookies update ● AOB
Carry Over Actions from Past Meetings:		Status Update
<ul style="list-style-type: none"> ○ Inclusion - Yoti HR & leadership team to consider how to encourage a wider diversity of affinity/ interest groups, consider developing a toolkit for 'allies' and to undertake thorough exit interviews to understand staff motivations to move on. ○ Progress commercial discussions to expand open source mini PCR design ○ Deliver WCAG App 2.1 Accessibility by mid 2021 ○ Meet compliance of the Age Appropriate Design Code by September 2021 ○ Review ethical company awards and assess participation ○ In upcoming facial age estimation white paper - explain measurement approach, explain results of work on U13s 		<p style="text-align: right;">audit June 2021</p> <p style="text-align: right;">Enforcement date Sep 2021</p> <p style="text-align: right;">Oct 2021 completed</p>
Actions from this Meeting:		Status Update
<ul style="list-style-type: none"> ○ Schedule periodic blogs about trust framework participation both national & sector based ○ Review the work of Sovrin in terms of policy synergy 		
Next Council Meeting	3-02-2021	

Summary notes from the meeting are provided on the following pages, with points of agreement and actions clearly noted.



<i>Welcome</i>	Meeting began at 1700.
<i>Yoti Position under Covid</i>	<p>Yoti updated Guardians as to the efforts being taken to pivot and remain commercially robust in very challenging Covid-affected economic circumstances.</p> <ul style="list-style-type: none"> Public sector services tender progress. COVID-19 health credential and testing progress with UK Government, DHSC, aviation, Scotland. Progress with GeneMe & FRANKD tests. Mini PCR device prototype mini PCR (8 testing tube) product, Kit costing €250, plan to issue a free, open source blueprint. R welcomed any contacts from Guardians who may be interested in extending cost effective high quality Covid testing capacity Yoti investment in Security Centre automation. <p>Other growth areas - Canada, Financial Services, New Zealand.</p> <p>The Guardians noted the parallels in terms of trust framework work that IceBreaker One is undertaking. (https://icebreakerone.org/understanding-data-sharing-market-design/ and specifically that they're rolling out for Energy https://icebreakerone.org/energy/; plus they wrote the chapters on Consent and Liability for the Smart Data strategy https://dgen.net/0/2020/08/15/designing-the-uks-shared-data-infrastructure/</p> <p>The Guardians reminded the team to review and touch base with the Sovrin work in this area.</p>
<i>Discussion Topics</i>	The following points were tabled for input and advice from Guardians.
<i>Digital Identity regulatory shifts</i>	<p>Topic:</p> <p>The Regulatory and Policy team outlined some of the live consultation processes we are inputting in to including:</p> <ul style="list-style-type: none"> 5AMLd, Money Laundering Regulations 2019 and JMLSG (biometric chip reading of documents) guidelines all placing greater emphasis on digital identity. Electronic conveyancing of land finally going ahead, bolstered by the use of digital signatures. COVID-19 extraordinary measures put in place by the government, now permits individuals to prove their identity remotely e.g. for the acquisition of financial products, right to work checks and right to rent checks, Disclosure and Barring Service. Online Harms, AVMSD (Audiovisual Media Services Directive), AADC (Age Appropriate Design Code) Review of KYC approaches by German regulator BAFIN and upcoming changes to gambling regulations in Germany. National Trust frameworks we're participating in - UK, Canada, Australia, New Zealand Trust frameworks in vertical markets - UK Financial services - TISA, UK Property (etive), Global Employment credentials - Velocity Foundation Network, Global Health credentials CommonPASS (WEF) - based on HL7 FHIR (https://www.hl7.org/fhir/ and LOINC: loinc.org) <p>Discussion:</p> <ul style="list-style-type: none"> The Guardians reminded the team to show where Yoti fits with the W3C credentials model and working group and DID working group. Guardians cautioned Yoti to avoid racing into every development in this area, as it is not possible for Yoti to stay ahead of the countless curves that are moving in all the relevant regulatory spaces. The Guardians gave the example of PRIDA and asked the group to promote regulatory frameworks that are anti racist, intersectional as well as transparent and ethical.
<i>Yoti R&D updates</i>	Topic:



	<p>Yoti asked Guardians for any input on changes being planned in our R&D work to make sure that we are not missing anything important in terms of implications for our community; given this area is not as publicly visible to the Yoti community.</p> <p>Two distinct topics specifically related to Yoti's R&D work were discussed:</p> <p>1. Facial age estimation – the addition of Month of Birth: We are now starting to record Month of Birth in our training algorithm as well as Year of Birth, and Anonymised Image. We have updated our privacy notice to this effect (done on 26 October). We have signalled the move to also collecting Month of Birth via a blog and the latest Oct 2020 white paper, and have also added an 'explainer title' about facial age estimation in the Discovery section of the Yoti app.</p> <p>2. Next steps for research. Given the sensitive nature of this area, the Guardians have requested regular updates regarding the use and potential use cases for Yoti's technology capability with Guardians before (with valuable input and guidance received). Yoti has made a number of public commitments regarding the use of face technologies including:</p> <ul style="list-style-type: none">• Signing up to the Safe Face Pledge (now sunsetted) and the Biometrics Institute's Seven Ethical Principles.• Participating in the Ada Lovelace's Citizens' Biometrics Council Oversight Board on the use of biometrics. <p>As we progress the development of our in house software, the Yoti Ethics Committee, steered by the Regulatory and Policy Team has looked at potential guidelines and boundaries for the commercial deployment of our services, considering specific acceptable and unacceptable use cases (with the benefit of input from the Guardians in our October 2019 GC meeting. In line with our discussions, the Yoti Ethics Committee is reviewing the topic and has identified acceptable and unacceptable use cases as follows.</p> <ul style="list-style-type: none">• Acceptable use cases:<ul style="list-style-type: none">o To assist with gambling self-exclusions in physical premises, such as casinos. This usually involves connecting to the CCTV system to identify self-excluders to be able to intervene. (1:n).o Voluntary schemes where a customer offers a service to its users / customers so they can use their face as well as another mechanism (for example, access control; pay with face...) (Setup is key here as the system can't work by scanning every face, only those choosing to use it.) (1:n).• Unacceptable use cases<ul style="list-style-type: none">o Law enforcement or government use cases: while the Safe Face pledge gives leeway to sell tech for some of these use cases, Yoti should steer clear for now given the lack of oversight in many countries, the fact many places have moved to ban or suspend public sector use until better rules are worked out, the accuracy and discrimination issues of the tech.o Advertising, mood sensing use cases: these are intrusive use cases for facial recognition tech, and for trivial purposes. <p>Discussion: Guardians agreed with Yoti's synthesis of discussion and input and endorsed the forward development in this area using those guidelines. Guardians also Suggested a Creative Commons mark that says "the face or faces in this photo cannot be used for training an AI". Suggestion that the extension of Creative Commons into "Shared Data" *might* be something to explore... https://icebreakerone.org/understanding-data-sharing/</p>
ICO Sandbox &	Topic:



<p>Age Appropriate Design Code</p>	<p>Yoti's Regulatory and Policy Team outlined this mostly for information, but given the sensitivities around U13s and digital identity, with the intention of keeping the Guardians up to speed with our developments in this area and to seek any guidance, input or suggested connections to informed experts that Guardians can offer.</p> <p>In summary, Yoti is progressing to develop U13 facial age estimation, as part of its work in the ICO Sandbox, initially with the 6-12 age group. Yoti's app is for individuals aged 13+ and so we have only had access to images of 13 year olds and above. The incoming Age Appropriate Design Code in the UK is going to require content organisations from September 2021 to consider the demographic of their users and provide proportionate assessment of risks and implement age assurance, potentially including U13s.</p> <ul style="list-style-type: none">• One of our partners, which provides kid safe social networks and works with schools across 60+ countries is keen to work with us to extend the algorithm to U13s and age assess both parent and child using Yoti Age Scan.• We are also working on an education challenge for children to create materials for other children to explain what age estimation is, why it needs to reflect the diversity of the population and how people can opt in to support it. This follows Unicef policy guidance on making AI explainable to children. <p>The Regulatory and Policy Team detailed Yoti's partnership with the ICO Sandbox in order to offer age appropriate child-centred content moderation, together with privacy information, accessible parental consent and simple authentication at a global scale. This will put Yoti under more scrutiny. The objective is that Yoti's identity platform, GoBubbleWrap's child-content moderation SaaS and British Esports Association will:</p> <ul style="list-style-type: none">• use this technology to launch an age verified, content moderated esports membership platform for under 18s with parental consent options;• extend Yoti age estimation for under 13 year olds without ID documents, where their face is analysed and the image instantly deleted. <p>The partnership will offer white label solutions to help other platforms and content communities meet regulatory requirements to protect children from unwanted intrusions, inappropriate content and minimise the risk of grooming - offered on a software as a service basis. Yoti is also in the process of refining a parental consent approach, based on facial age estimation of adults, to present to various regulators on parental consent. We plan to run a joint campaign developing materials and explaining age estimation to teachers, parents, kids based on the Unicef explainable AI policy guidance, materials to be shared for Safer Internet Day).</p> <p>The Regulatory and Policy Team gave some context on the Age Appropriate Design Code – incoming UK legislation, deadline to meet by September 2021. Essentially this is a code requiring online service providers to treat children differently to adults and design their services for children's needs. It's important that Yoti complies with the code for our own products and services. The overarching requirement is that companies must build the standards set out in the Code into design processes from the start, into subsequent upgrade and service development processes and into the PIA process.</p> <p>Discussion: Key comments:</p> <ul style="list-style-type: none">• The Guardians strongly encouraged Yoti's public educational campaign efforts in this area.• Guardians also asked about the current level of bias, in the latest facial age estimation white paper.• Suggestion that Yoti should look at explaining how we got here, why we developed the facial age estimation in the first place - to support inclusion for people who do not own or have access to identity documents. Yoti should look to explain how we measure what we do and
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	<p>how we look at bias and ‘re-norming’ and the explanation of measurement in a future white paper.</p> <ul style="list-style-type: none">• Input that the surge in selfies by young people (averaging in the thousands per person per year) is driving a surge in underage surgery, with young people seeking to adjust their appearance to ideals set by influencers.• The Guardians asked if there are any studies into facial age estimation of mask wearers. The Regulatory and Policy Team described that Yoti has looked into the accuracy of its facial age estimation by wearers of masks, so partially occluded facial features, but eyes still visible. The results show that age can still be estimated, just with a slighter higher MAE.
Yoti & Cookies	<p>Topic:</p> <p>Knowing that Guardians have expressed strong views on the use of cookies in past meetings, Yoti updated the Guardians on a couple of changes regarding Yoti’s targeted use of cookies and sought feedback on how we are trying to do so in a targeted and specific way that is focused on potential business customers.</p> <p>Yoti summarised how we are striving to balance the principled and individual centric approach and set of principles that define our organisation, with the commercial needs of a growing business. Related to cookies, Yoti needs to market our products and services, and we have elected to use retargeting as a marketing tool. The summary of our approach is also stated in the preference centre for the targeting cookies (for any individual that wishes to see or change their cookie preferences) which reads as follows:</p> <p><i>“Targeting / advertising These are provided by our advertising partners. We use their cookies and site visit pixels on some of our websites for remarketing. This means that those partners (Google, Facebook, LinkedIn and Instagram) can show Yoti ads to people who have recently visited the Yoti websites. Our aim is to retarget businesses who are interested in Yoti solutions, not individuals browsing the site, but we are not able to distinguish between them”</i></p> <p>(there is also a link to see the actual cookies)</p> <p>For the layperson, persons will be retargeted with ads if they opt in to cookies on yoti.com & yotisign.com websites. Our cookie banner allows persons to reject or accept cookies with one click of a button, which we have made as simple as we can. We are running B2B retargeting campaigns for Identity Verification and Yoti Sign. Persons will only be retargeted with ads if they visit the following pages:</p> <ul style="list-style-type: none">• Identity Verification: yoti.com/business/identity-verification/ or yoti.com/business/doc-scan/• Yoti Sign: yotisign.com or yoti.com/business/e-signing/ <p>Other steps we have taken to ensure our use of cookies and retargeting are focused in terms of frequency and reach:</p> <ul style="list-style-type: none">• These campaigns are currently UK only.• Persons will not be targeted if they have filled out the web form on these respective pages.• Cookies are included in retargeting for 30 days (unless persons complete web form)• Current frequency of ads is capped at two per day. <p>We are using OneTrust for this after an evaluation of tools was conducted (by our Data Protection and Privacy Officer and members of our Product and Marketing teams).</p> <p>Discussion:</p>



	The Guardians challenged Yoti to consider, how many deals does Yoti 'close' based on retargeting, to ensure analysis of the desired outcome. Guardians recommended reading of Tim Hwang's new book, Subprime Attention Crisis : The Guardians asked us to consider how many people are repelled by this same retargeting...be the "Among Us" growth curve of identity, and suggested using Instagram influencers as a more peer to peer recommendation. Yoti does undertake this and will continue to review its approach.
<i>AOB</i>	
<i>Adjournment</i>	The meeting was called to a close at 1930.

2020 Meeting Attendance													
Meeting Dates	3/2	4/5	1/9	1/12			Yoti Staff	2/3	4/5	1/9	1/12		
Renata Avila	●	●	●	●			Robin Tombs	●	●	●	●		
Doc Searls	●	●	●	●			Julie Dawson	●	●	●	●		
Joyce Searls	●	●	●	●			Eric Levine	●	●	●	●		
Gavin Starks	●	●	●	●			Sam Rowe	●	●	☒	●		
Seyi Akiwowo	●	●	●	●			Paco Garcia	☒	☒	☒	●		
							John Abbott	●	☒	●	☒		
							Emma Butler	●	☒	●	☒		

● = in attendance ● = absent/ apologies ☒ = Not scheduled to attend