

## Yoti Guardians Council Meeting 16 July 2019

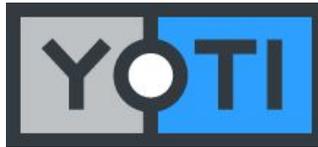
**Attendance:** See Table at end  
**Date:** 16 July 2019, 1700-1930 GMT

**Location:** Yoti Office & VC  
**Recorder:** Eric Levine

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| <b>Agenda</b>  | <ol style="list-style-type: none"> <li>1. Diversity and inclusion policies and activities</li> <li>2. Amberhill data sharing</li> <li>3. GDPR implementation update</li> </ol> | <ol style="list-style-type: none"> <li>4. Yoti AgeScan Under 13s Roundtable share out</li> <li>5. Guardian Council candidates</li> </ol> |
| <b>Actions from Previous Meeting &amp; this Meeting:</b>     |  | <b>Status Update</b>   |
| o GDPR implementation progress to be reviewed with Guardians |  | Completed  |
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*Summary notes from the meeting are provided below, with points of agreement and actions clearly noted.*

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| <i>Welcome</i>  | Meeting began at 1700.  |
| <i>1. Diversity and inclusion policies and activities</i> | <p><b>Topic:</b> As discussed at the last Council Meeting, Yoti has set up an Ethical Working Group to serve as a first port of call for considering complex ethical issues that arise for the business. The first topic that has been taken up by the Ethical Working Group is gender, focused on decisions as to:</p> <ol style="list-style-type: none"> <li>a) Whether to allow people to self-certify or self-assert their gender in the app; and</li> <li>b) If Yoti can do this, how that could work.</li> </ol> <p>The major steps involved in the review process that the Ethical Working Group has developed to inform recommendations involves broadly:</p> <ul style="list-style-type: none"> <li>• Defining the ethical issues (including relevant laws and regulations, relevant Yoti business principles)</li> <li>• Exploring the potential positive and negative consequences of the issue (for our user community, Yoti as a business, the broader public and sector, as well as any specific child-related issues to consider)</li> <li>• Informing potential courses of action (including any relevant ethical frameworks that can be applied, any internal or external stakeholders or perspectives that Yoti should engage with)</li> </ul> <p>As this is the first topic taken up by the Ethical Working Group, Guardians were asked for feedback on the materials and process/decision-making framework that the Working Group has developed, as well as any input on the topic of gender.</p> <p><b>Discussion:</b> Guardians were encouraging about the process that Yoti has developed for the Ethical Working Group to use, in terms of the depth of research and the structured manner in which the Working Group discusses complex issues. Regarding the process that Yoti has developed, Guardians offered the following suggestions:</p> <ul style="list-style-type: none"> <li>• With complex social issues, it is easy to source perspectives from experts in the UK, US and Europe, and Yoti should make sure to include a diversity of perspectives from other regions.</li> <li>• High value in direct engagement with specialist civil society and campaigning organisations representing minority populations who can provide Yoti with different perspectives than academic and industry association groups (and can show that Yoti is interested in direct engagement with those organisations and utilising their expertise).</li> </ul> |



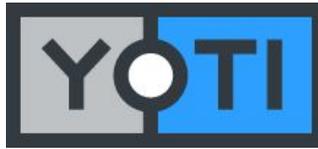
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|   | <ul style="list-style-type: none"> <li>• Yoti’s signalling in terms of applying strong values to complex issues is powerful (and recognising a diversity of perspectives) and is aligned with Yoti’s desire for people to feel safe and able to express their identity.</li> <li>• As Yoti grapples with complex issues like gender self-assertion, Yoti should publicly share the story of how it comes to the decisions that it does as the transparency and thoughtfulness of Yoti’s approach will give confidence in how its values are put into practice.</li> </ul> <p>On the specific content of the gender issues that were being explored by the Ethical Working Group, Guardians offered:</p> <ul style="list-style-type: none"> <li>• Yoti’s desire to allow people to self-certify and self-assert their gender is laudable, and Guardians are in favour of Yoti making it possible for gender to be expressed as an individual choice.</li> <li>• Appreciation of Yoti’s engagement with organisations like Sparkle and Stonewall to understand issues from LGBTQ+ communities.</li> <li>• Recognition that allowing self-assertion also creates complications in some situations where replying parties may need some other form of attestation (e.g., for example, in medical circumstances there may be a need to know what chromosomes an individual carries).</li> <li>• Guardians offered connections to Victor Madrigal-Borloz, the UN Independent Expert on Protection against violence and discrimination based on sexual orientation and gender identity, if that is useful at any stage.</li> </ul>   |
| <p><i>2. Amberhill data sharing</i></p> | <p><b>Topic:</b> Input and guidance requested from Guardians as Yoti determines how to manage the first disclosure of information to Operation Amberhill to make sure that we are staying true to our guiding principles and commitments to the Yoti community. Follow-on discussion on this topic, first taken up by Guardians in April and July 2016 meetings when we reviewed our information sharing arrangements between the Metropolitan Police Service’s Operation Amberhill and Yoti for the purpose of identifying those using false identity documents to commit criminal offences. At that time, Guardians reviewed and supported Yoti moving forward to:</p> <ol style="list-style-type: none"> <li>a) Receive false identity data from Operation Amberhill that has been lawfully obtained from the legal searching of illegal identity factories and the seizure of computers and documentation;</li> <li>b) Yoti to share back with Amberhill any matches with Amberhill for assessment and potential investigation to allow both parties to identify potential offenders who have obtained product and services using false identities.</li> </ol> <p><b>Discussion:</b> The discussion with the Guardians included:</p> <ul style="list-style-type: none"> <li>• Guardians recognise the dilemma created by the legitimate interests of: a) user privacy; and b) stopping the use of false ID documents within the Yoti system to provide confidence and trust to the Yoti community.</li> <li>• Guardians agree that Yoti has received information from Amberhill about false identities, and that this provides a benefit to Yoti in helping to identify known false identities that could have been used to register accounts in the Yoti system (keeping the Yoti digital ID system secure and ensuring trust for the Yoti community in sharing and accepting Yoti-verified IDs).</li> <li>• Yoti now should share back information in compliance with its agreement with Operation Amberhill on any matches with the Amberhill false identities that it has received, including the details of false ID documents (and related document images) that we receive from users trying to register Yotis, as this will assist in preventing the use of fake ID documents in the Yoti system and more broadly.</li> <li>• Guardians agreed that this should be reflected in our privacy notice for the Yoti community.</li> <li>• With regard to additional information that is not related to/matching with the Operation Amberhill datasets, Yoti has conducted an assessment under the GDPR principle of legitimate interests, and has decided not to share any other documents that Yoti has identified, such as</li> </ul> |



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|  | <p>ID documents that have been ‘tampered’ with (e.g., 17-year olds trying to alter ID documents to be 18-years old), or cases where the ID document and user selfie do not match. The rationale for this is that Yoti wants to be sensitive to the possible consequences of anyone being on the police intelligence database. Guardians strongly supported this conclusion.</p> <ul style="list-style-type: none"> <li>Guardians urged Yoti to maintain its position of only sharing information on false ID documents with authorities when it is legally required to do so, or in cases such as with Amberhill where Yoti is required to do so (matching) in order to receive information from the authorities that is essential to protecting the security of the Yoti system, in keeping with its primary obligations and commitments to the Yoti community and its user’ privacy.</li> <li>Guardians suggested that Yoti could share publicly on a semi-regular basis the number and different types of incidents of false ID document usage to provide transparency of its efforts to protect the Yoti system, and the amount of information shared with any authorities.</li> </ul>   |
| <p>3. <i>GDPR implement. update</i></p>                      | <p><b>Topic:</b> Guardians discussed Yoti’s preparation and plans for GDPR implementation at the April 2018 Council meeting. At that time, Guardians felt that Yoti was taking appropriate steps on GDPR for its user community, and requested that we return to the Council with an update on implementation. One year since GDPR went into effect, Yoti’s Privacy Officer joined the meeting to provide an update on Yoti’s GDPR Implementation process and the primary oversight framework Yoti uses for tracking GDPR implementation.</p> <p><b>Discussion:</b> Summary of the discussion with Guardians included:</p> <ul style="list-style-type: none"> <li>Guardians are satisfied that Yoti’s GDPR implementation is on track and all reasonable steps are being taken, recognising that this is an ongoing process that will involve continual learning and adjustments.</li> <li>Guardians confident that Yoti is in a strong position to respond to the increasing number of privacy due diligence checks being asked for by potential business partners wanting to use Yoti.</li> <li>Guardians recommended Yoti shifting its mindset from ‘GDPR Compliance’ to one of implementing a constantly evolving ‘Privacy Governance Framework.’ Suggestion from Guardians to review the Project VRM Privacy Manifesto as stimulus.</li> <li>Guardians suggested that Yoti should clarify its cookie notification to specify that Yoti only uses cookies for internal purposes.</li> <li>Guardians encouraged Yoti to continue to decrease reliance on Google Analytics tools, and to consider writing a blog on GDPR implementation that includes the shortage of alternatives for technology businesses like Yoti who wish to use more robust privacy tools than what Google Analytics offers.</li> </ul> |
| <p>4. <i>Yoti AgeScan Under 13s Roundtable share out</i></p> | <p><b>Topic:</b> Share out of roundtable event held in April focused on exploring how Yoti Age Scan could potentially work for under-13s. This was the second public roundtable event (series started at suggestion of the Guardian Council), following on from one in January on Yoti’s approach to the responsible research and development of AI tools, specifically looking at Yoti Age Scan (our age estimation technology). Gavin chaired both events.</p> <p><b>Discussion:</b> Summary points from share out to the Council included:</p> <ul style="list-style-type: none"> <li>We have been pleased with the progress that Yoti has been making in partnership with platforms like Yubo to make sure their community remains safe for everyone (by verifying the age of individuals trying to enter and participate in age-specific communities online). At the moment, Yoti Age Scan only works for over-13s, and so we wanted to explore the specific challenges/risks of developing Yoti Age Scan for under-13s.</li> </ul>   |

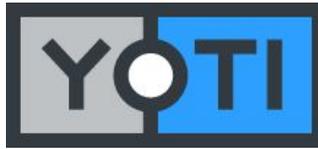


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|  | <ul style="list-style-type: none"> <li>• For the session, representatives from 5Rights, GCHQ, Vivace, the Children’s Commissioner’s Office, NSPCC, Centre for Data Ethics and Innovation, Barnardos, ICO and Doteveryone attended.</li> <li>• For the event, participants used the <a href="#">Consequence Scanning framework</a> developed by Doteveryone to help us think about the intended and unintended (positive and negative) consequences of developing and deploying Yoti Age Scan for under-13s. Positive feedback on the use of the framework by everyone attending.</li> <li>• Gavin and Yoti staff present for the event shared that there was a very positive reception from participants to being invited to an open discussion forum on complex issues that many businesses and organisations are dealing with.</li> <li>• Strong domain expertise was represented by participants at the event, but noted the need to bring in more commercial perspectives in future discussions.</li> <li>• The need to create safe spaces for online gaming is an easy story to tell, and a rationale that gets support from a wide range of actors.</li> <li>• A number of additional questions and issues were identified by participants at the event such as: the difference between chronological and mental ages; difference in parental consent norms in different cultures; likelihood of children of multiple ages being present in a room (e.g., 6-year-old in a room with a 12-year old online). Guardians recognise that Yoti does not have solutions for all these issues (not should it be expected to have them), and encouraged Yoti to continue to communicate publicly in events and in blog posts about how it is trying to make the right decisions in new, complex territory.</li> <li>• Guardians encouraged Yoti to continue to invest effort in such public events and discussions as part of its thought leadership in the sector. Also suggested that Yoti consider identifying a different term than ‘facial recognition’ that would help make clear the purpose of the technology and the fact that images are not retained (e.g., disposable face check).</li> </ul> |
| <p>6. <i>Guardian Council candidates</i></p> | <p><b>Topic:</b> As noted in earlier Council meeting minutes, the Guardian Council is currently undertaking a recruitment process to add another member to the Council. Following longlisting of suggested candidates from Guardians and other experts in the sector, and interview conversations with a wide range of candidates, the Guardian Council discussed in detail the two finalist candidates. The Council concluded that both candidates were imminently qualified for the role and would bring much value to the Council, and commended Yoti for the process undertaken and the quality of the candidates.</p> <p>The Guardian Council unanimously recommended Seyi Akiwowo, founder of Fix the Glitch, as the preferred candidate. It was agreed that one final meeting with Seyi would be organized following the meeting to explore any remaining questions she might have about Yoti and the Council, and if she was willing to accept the role that she would be invited to join the Council for the next meeting.</p>  |
| <p><i>Adjournment</i></p>                    | <p>The meeting was called to a close at 1930.</p>  |

### 2019 Meeting Attendance

|               |      |     |      |       |  |  |            |      |     |      |       |  |  |  |
|---------------|------|-----|------|-------|--|--|------------|------|-----|------|-------|--|--|--|
| Meeting Dates | 11/2 | 7/5 | 16/7 | 22/10 |  |  | Yoti Staff | 11/2 | 7/5 | 16/7 | 22/10 |  |  |  |
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16 July 2019**

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|--------------|---|---|---|--|--|--|-----------------|---|---|---|--|--|--|--|
| Renata Avila | ● | ● | ● |  |  |  | Robin Tombs     | ● | ☒ | ● |  |  |  |  |
| Doc Searls   | ● | ● | ● |  |  |  | Julie Dawson    | ● | ● | ☒ |  |  |  |  |
| Joyce Searls | ● | ● | ● |  |  |  | Leanne Marshall | ● | ● | ● |  |  |  |  |
| Gavin Starks | ● | ● | ● |  |  |  | Eric Levine     | ● | ● | ● |  |  |  |  |
|              |   |   |   |  |  |  | John Abbott     | ● | ● | ☒ |  |  |  |  |
|              |   |   |   |  |  |  | Sam Rowe        | ☒ | ● | ● |  |  |  |  |
|              |   |   |   |  |  |  | Emma Butler     | ☒ | ☒ | ● |  |  |  |  |

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