Yoti Founding Guardians Council Meeting
18 October 2016

Attendance: See Table at end   **Location:** Yoti Office & VC   **Date:** 18 October 2016, 1700-1930 GMT   **Recorder:** Eric Levine

Agenda	1. Updates from last meeting. 2. Yoti product/business update 3. Topics for discussion with Guardians ● Draft Approach to Account Suspension/ Blocking Users ● Draft Policy for Under 18s having Yotis	● Process for Seeking Feedback/ Input on Complex Issues ● Yoti Presence in Global Identity Agenda 4. Dates for 2017 Guardian Council Meetings 5. Restarting recruitment for additional Guardians 6. Briefing Paper for No.10 Downing Street on Public Sector Use Cases

Carry Over Actions from Past Meetings:	Status Update
o Signing up to UN Guidelines on Businesses and Human Rights: Renata to inquire through UN contacts what the best way is for Yoti to engage with the UN towards publicly committing to the Guidelines, and Eric to work with Chris to include Yoti publicly committing to UN Guidelines in public communications planning when we get to public launch.	TBD after public launch
o Privacy Policy: Guardians to feedback on near final version of Privacy Policy, input to be incorporated into Policy for public launch.	25 October 2016
o Criminal Use of Yoti: Julie leading the process of gathering input from internal and external audiences, with draft policy how Yoti responds to criminal use of our product to the January Guardian Council meeting.	17 Jan 2017

Actions from this Meeting:	Status Update
o Google Analytics and User Tracking: Ensure the current version of the Yoti Privacy and Cookies Policy informs users that Yoti is using Google Analytics data collection with minimised, anonymised insights to improve the Yoti service.	1 November 2016
o Google Analytics and User Tracking: Transparently communicate the rationale for using Google Analytics so that any user or journalist interested in the subject can understand the choices we are making.	15 November 2016
o Google Analytics and User Testing: Yoti to develop a plan and timeline for reducing reliance on Google Analytics.	30 June 2017
o Digital ID for Development: Joyce to introduce Julie to Consumers International in London to explore how Yoti can contribute to the Consumer Rights in a Digital Age theme and activities.	1 November 2016
o Digital ID for Development: Renata to introduce Julie to relevant contacts in Germany working on this theme as part of the G20 proceedings to explore if and how Yoti can participate and contribute.	15 January 2017
o Digital ID for Development: Duncan to lead drafting of a white paper for the Chair of ID2020 on how Yoti could potentially contribute to the global effort to deliver IDs for the 1.5 billion people who do not yet have an ID.	31 March 2017
o Eric to confirm dates and calendar invites for 2017 Guardian Council meetings.	1 November 2016

Yoti Founding Guardians Council Meeting
18 October 2016

Next Council Meeting	Next Council meeting: 17 January 2017, 1700-1930 UK time

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

Yoti Founding Guardians Council Meeting
18 October 2016

Welcome	Meeting began at 1700.
1. Update on Actions from Past Meetings	**Draft Individual Terms & Conditions:** Incorporating the input from Guardians received, we now have Yoti Consumer Terms & Conditions that we are content to use for the public release of the Yoti app in several weeks time. With a final review during the meeting, identifying a couple of minor language edits which will be incorporated into the final version to be launched with our app, the Guardians endorsed the final version of the Consumer Terms & Conditions and our collective efforts to use simpler language, make them easier to understand for our users, and appropriately weighted in terms of rights for our users and protections for Yoti. A good initial start for our desire to have solid, sensible, simple Terms & Conditions. **Draft Individual Privacy Policy:** We are still working on the draft Privacy Policy, incorporating the input from Guardians and our legal counsel. Our newly recruited Data Protection lead, will be finalising the Privacy Policy and sharing it with Guardians for final feedback before it is used in the public release of the Yoti app in early November. **Criminal Use of Yoti:** Following on from our discussions on this topic at the last Guardian Council meeting, we are in the process of gathering feedback on these issues through both a survey instrument and in deeper focus group discussions (with Yoti staff and with selected groups of representative potential users and members of the public), as well as legal advice on any obligations that Yoti needs to adhere to. We will bring the input from these steps back to the Guardian Council along with our draft policy in this area at the January Guardian Council meeting. **Social Partnerships Strategy:** Following on from discussions at the last Guardian Council meeting, we had an initial planning session on Yoti's approach to social partnerships with six members of the Yoti team (who have been working on different aspects of the social partnerships agenda) and Ken Banks. For the short-term we agreed that we will be focussing over the next six months on social partnership opportunities with organisations that: a) have a clear social purpose and are based in the UK; b) have specific use cases that can benefit from Yoti's current product functionality; and c) can help Yoti test the app with users.

2. Yoti Product Update	**Most Recent Release.** We have recently released the new android and iOS v.0.11 Yoti apps, which we are currently testing with friends, family and other Yoti contacts downloading via Enterprise. Key new features for this release include remote and face to face sharing for iOS and android, users being able to add their UK drivers licence (in addition to passports), and users being able to take up to ten selfies to choose from for their Yoti profile picture. Also, Dashboard (allowing anyone to set up an account page to manage interactions with Yoti users) and Connect (priority ticketing site demonstrating how you can use your Yoti to access online content based on permissions associated with sharing specific attributes from your Yoti) are also working with this new release. **Upcoming Milestones.** We are moving very rapidly to deliver against the following milestones: ● App store submission: targeting early November for the Yoti app to be ready for submission to app stores – app store approval can take 1-2 weeks. We will be using the November-Deceember time period for live user testing, before promoting Yoti more widely. ● Additional attributes: users will be able to add their email address and physical address to their Yoti profile (self-asserted and verified). ● Marketing launch: We will be starting marketing activities in early 2017, primarily using digital advertising routes, after we have a month of initial user testing of the public product. ● Pilots: We have a number of pilots that will begin to go live in December, including a major recruitment agency, and a number of nightclubs (using MyVenue, our access management platform).
3. Discussion Topics	The following points were tabled for input and advice from Guardians.
3a. Google Analytics and User Tracking	Issue: The Yoti mobile apps are scheduled to go live in the next few weeks. Events that are generated by a user's interaction with Yoti mobile apps and web pages are currently being sent to the Google Analytics service, providing Yoti with analytics on how users interact with our product allowing us to fix any problems with the user experience. Google Analytics tracks individual devices and collects detailed device usage history across sessions, and could be used by Google (independently or in combination with public records) to identify specific Yoti users. This raises potential concerns for Yoti as we want to stay true to our promise to users to respect and protect their privacy.

Questions for Guardians: To what extent should Yoti track its users and their behaviour over time in order to understand their interaction with our apps so as to be able to provide a good service? To what extent should Yoti allow third parties (like Google Analytics) to track our users behaviour in the provision of analytics to us?

Discussion: In discussing this matter, the group agreed on the following points:
- Yoti has little leverage to exert in the use of Google analytics, and so are not able to get Google to change their terms of service for Google Analytics to prevent them from using Yoti users' activity data.
- In light of Yoti's essential business needs to understand user activity registering for and interacting with our soon-to-be launched apps, we recognise that Yoti needs to make use of Google Analytics in the initial stages of launching our product to be able to provide a good service to our users.
- Given Yoti's principles related to transparency and user privacy, Yoti should take steps to communicate publicly about the choices we are making to use Google Analytics (in our Privacy Policy and through our website).
- This presents an opportunity for Yoti to play a leadership role, communicating the challenges for businesses needing good analytics for their products, while also wanting to protect users' privacy – both in communicating the challenges publicly and in utilising/developing alternative methods of getting analytics for the use of our product that could benefit other companies in a similar position.

In the immediate term, Yoti will:
- **Action:** Ensure the current version of the Yoti Privacy and Cookies Policy informs users that Yoti is using Google Analytics data collection with minimised, anonymised insights to improve the Yoti service.
- **Action:** Transparently communicate the rationale for using Google Analytics so that any user or journalist interested in the subject can understand the choices we are making.

In the mid-term, Yoti will develop a plan/timeline for reducing reliance on Google Analytics (**action**), including:
- Substantially decreasing the event notifications sent to Google Analytics to those that are necessary to address specific business requirements (sharing fewer data points with Google Analytics).
- Eliminate the dual registration of events between Google Analytics and Yoti's Core.
- Add key duration metrics and phone characteristics to Yoti's Core to eliminate dependence on Google Analytics.

	● Investigate alternative ethical analytics services (e.g., Piwick, Decibel Insight and others), and consider developing comprehensive internal Yoti analytics functionality (and consider sharing part or all of this to open source usage). The Guardians acknowledged Yoti for its thoughtful approach to these issues, allowing Yoti to receive critical anonymous analytics related to the key activities interacting with our apps, while avoiding any user tracking of individual user activities. The group agreed to consider the issue again at the next meeting.
3b. Draft Approach to Account Suspension/ Blocking Users	<u>Issue</u>: Yoti needs to have a clear and consistent approach to/policy for the acceptance and non-acceptance of users, and an escalation process in the event of any complaints or queries resulting from potential attempts to register Yoti accounts with fraudulent identities. <u>Questions for Guardians:</u> Review of Yoti's proposed steps to manage these issues, and willingness of Guardians to serve as the apex of our escalation process to help decide on any complex cases. <u>Discussion:</u> In discussing this matter, the Guardian Council agreed with Yoti's proposed approach, including their role as the apex of the escalation process for complex cases, summarised as: **Grounds for Suspension of a Yoti account? (defined time period)** ● Use of a counterfeit document ● Theft of someone else's identity to create a counterfeit document ● Request by an authority with evidence of fraudulent identity or criminal act **Grounds for blocking a Yoti account (indefinite time period)** ● Request by an authority with evidence of fraudulent identity or criminal act **Review Process** ● Evidence gathering for grounds for suspension, time limited or unlimited ● Evidence submission ● Legal advice if required for specific situations ● Review Group ● Decision ● Decision Review timetable

	● Periodic reporting in Transparency report **Escalation** ● Data review group, subset of Senior Management Team ● Guardian Council **Complaints** ● Data review group, subset of Senior Management Team The group agreed that this policy area needs to be reviewed as the Yoti ecosystem and technology evolves and as we gather data on the attempted and successful criminal use of Yoti develops.
3c. Draft Policy for Under 18s having Yotis	<u>Issue:</u> Yoti believes that individuals aged 12-17 can gain significant benefits from registering and using a Yoti. Drawing on the input of the stakeholders mentioned above, below we have sketched out a number of areas where we see potential benefits for 12-17 year olds (both specific to this age group and benefits shared with adult Yoti users), as well as a list of particular considerations and challenges pertaining to this age group. <u>Questions for Guardians</u>: We have undertaken a wide range of engagement in this area with stakeholders, experts and policymakers in this area, including Mumsnet, UK Youth, The Parent Zone, working with the Digital Policy Alliance on age verification, and presentations to the Department of Culture, Media and Sport, and the Number 10 Policy Unit. Given the sensitive nature of these issues, we asked the Guardians to review our approach to under-18s using Yoti to identify any areas that need more research, or need to be communicated more clearly. <u>Discussion:</u> After reviewing Yoti's assessment of the related issues, the Guardians agreed that: ● There are a wide range of benefits that 12-17-year olds could receive by registering and using a Yoti, ● Yoti should allow 12-17 year-olds to register and use Yotis from the initial product release in November, closely monitoring use and any emerging issues or risks (for example considering restricting sharing of specific attributes by under-18s based on experience). ● Yoti should take into account specific areas that require careful consideration for this demographic, and take steps to mitigate risks in these areas.

- Yoti should continue to consult with experts, practitioners, interest groups and policy makers in this area, sharing our experience with under-18 Yoti users, and amending our course of action with feedback and input from these partners and our experience.

Guardians also emphasised that the use of a Yoti ID by under-18s provides an important benefit of making minors more conscious of the use of an ID, the need to protect their ID, and familiar with the ability to share their ID and credentials before coming of age as a legal adult.

Yoti's assessment of benefits and areas for consideration in this area can be summarised as:

Use Cases/Benefits for 12-17-year olds using Yotis (with current and projected future functionality):

- **Control over their data**: Yoti allows a young person to consent up front, give them control over their identity, allows them to share only the data needed, receipts/audit trail of who they are interacting with.
- **Proof of identity details, particularly proof of age**: ensuring appropriate access to child priced or age-specific tickets and discounts to theme parks, leisure facilities, cinemas, as well as proof of age for sports selection, membership schemes and access to online spaces restricted to minors (protecting children online). Also ensuring non-access to adult content, alcohol, tobacco, gambling content or commerce sites
- **Leave valuable ID documents at home**: preventing young people from needing to take a valuable physical ID document or copy of the same (using Yoti on their mobile or Yoti tag), to a cinema, music or sports venue, bank, public transport - reducing the high risk of loss/theft and then loss of valuable personal information.
- **Safety online** - avoid need to remember usernames, prevent use of weak passwords, reduce phishing fraud, identity theft, reducing ability of cyber bullies to be anonymous.
- **Accessibility:** Yoti is free to set up (often PASS card in England & Wales has a cost), and ability for young people to add attributes such as Duke of Edinburgh award, National Citizenship Service, work experience, and other formal and online qualifications to build their credentials/CV via a digital identity.
- **Peer to peer meetings: allowing young people to** know exactly who they are talking to / meeting (online and in person), preventing an adult from pretending to be a child online or arranging to meet a minor in person (also relevant for Under 18 dating sites like mylol, ourteennetwork, teendatingsite.net.

Potential issues for Yoti to consider:

	● **Contracting with minors:** Under UK law, under-18 users will not be bound by their obligations to Yoti regarding the use of our product. In the event of inappropriate use of a Yoti, we would simply close the Yoti account as per discussion earlier in the meeting. ● **Responsibility to educate minors:** about identity theft and identity fraud, sensible use of Yoti, data ownership, leaving an audit trail of receipts. Yoti will do this through our website and in partnership working with a wide range of organisations that specialise in children's digital rights and online child protection. ● **Age of criminal responsibility:** The age of criminal responsibility in the UK is 10 – they can be arrested and taken to court if committing a crime, such as fraud. ● **Advertising to minors:** Even though we are offering a free product, there are a range of considerations and guidelines related to promoting any 'product' or service to minors that Yoti is aware of and will adhere to. ● **Accessibility:** Options for young people without phones or ID docs. ● **Mass surveillance concerns:** Some communities are concerned about mass surveillance, radicalisation, stop and search, and we will need to make sure we communicate clearly how Yoti relates to these concerns and protects our users' data privacy. ● **Under-12s trying to set up a Yoti:** We will not be able to tell if an under-12 year old creates a Yoti (just selfie plus mobile), and so could potentially share their selfie and mobile with a website. However, that is the same as in today's world and they will be unable to add a passport to share their name and date of birth. ● **Parental consent – where required:** Yoti may be required to facilitate parental consent for under-18s using Yotis by the UK Information Commissioner's Office, or the requirements of the General Data Protection Regulation (GDPR). In this case, Yoti would have to develop a very easy and secure way for children to request parental consent for their use of Yoti.
3d. Process for Seeking Feedback/ Input on Complex Issues	<u>Issue:</u> We have seen already in the months leading up to our public product launch that there are (and will continue to be) sensitive, complex issues that will require Yoti to take sensible policy decisions to pro-actively and reactively mitigate risks, empower users and adhere to our principles. We do not yet have any standard processes to handle such issues, to determine when issues require solicitation of external input to inform decision-making processes, to determine the appropriate stakeholder groups to consult, or guidelines for how and when we are transparent about disclosing when we are seeking external input (or the results of that input and our ultimate policy decisions). As we are likely to be dealing with more and more complex, sensitive

	issues once we have a product in the market being used in ways that we cannot anticipate, we need to have agreed protocols for this so that we can manage such issues in a timely and responsible way. Question: Asked Guardians for any experience, processes, tools or advice on how to quickly and efficiently solicit input on complex issues from external stakeholder groups, while avoiding any unnecessary damage to Yoti's reputation. Discussion: In discussing this matter, the Guardians agreed that: ● Each complex issue will be unique, with specific associated circumstances, and therefore it is unlikely that Yoti will be able to use a standard process or protocol for all situations. ● Yoti's early track record of being vigilant and thoughtful about pro-actively addressing (and allocating time and resource) to complex issues as they emerge is worthy of commendation, and it is this is the manner that Yoti should continue to work going forward (with the addition of building in functionality for the Yoti user community to be able to contribute views on appropriate complex issues that come up. ● Continue to be open and pro-active in communicating Yoti's process and choices in dealing with complex issues, so that any interested party wanting to understand Yoti's position in a specific area can easily find a history of our choices, rationale and learning. ● Depending on the specific issue, other methods that Yoti can consider soliciting external input on some issues include: o Sponsoring debates by law societies, debate groups or other similar fora to discuss an issue and publish the transcripts/video of those events (and make sure that international users have a method of participating or observing any in-person events). o Using Meet-Ups of relevant communities of expertise to debate and discuss relevant issues. o Use Reddit forums to invite specialists to contribute on specific issues.
3e. Yoti Presence in Global Identity Agenda	Issue: Over the past six months, Yoti has been involved in a number of different initiatives focused on efforts to use digital ID for social development purposes (summarised below). Given the wide range of initiatives, communities and conferences focussed on identity (and digital identity) for development, we need to decide where we want to play amongst all these opportunities, how much resource we want to allocate in this direction, and what we are aiming to achieve by doing so. Question: Guidance on where and how to focus our limited resources to contribute to Digital ID for Development initiatives at this early stage in our organisational development.

Global ID for Development communities that Yoti has contributed to include:
- **Techfugees:** Attendance at Techfugee events, building relationships with (mostly small) organisations and initiatives seeking to serve the needs of refugees in Europe, aiming to find potential social partners who can make use of Yoti to improve their services.
- **UN Principles on Business and Human Rights:** As per previous Guardian Council meeting discussions, we have agreed that Yoti will publicly commit to upholding the UN Principles for Business and Human Rights – which naturally provides us an entry point into the UN Business and Human Rights community (which is very light on technology companies) to advocate for our principles around digital identity.
- **World Bank Principles for Identity for Development (ID4D):** We have been contributing to an initiative being convened by the World Bank to develop principles for public and private sector actors around delivering ID for development, and have been one of very few private sector providers contributing to the discussion and proposals.
- **UN ID2020:** We attended the ID2020 Summit earlier this year, the public kick-off of a multi-sector initiative aiming to bring together UN agencies, governments, civil society organisations, industry leaders and technology actors to deliver digital identity for everyone on the planet as part of their basic human rights. Yoti offered to put together a white paper for the Chair of ID2020 on how Yoti could potentially contribute to this effort.
- **Aid Institutions**: We have had initial meetings with policy representatives at DFID and USAID who are exploring and managing aid investments in ID-related initiatives, and looking at how digital ID can augment existing development efforts. They have asked for continued contact with Yoti and welcomed any efforts we are able to make in contributing to the development agenda.

Discussion: In discussing this matter, Guardians responded with:
- Yoti has noble intentions in participating in these and other related fora and initiatives. It is understandable for Yoti to focus resources on the upcoming public launch of the Yoti app.
- Yoti should prioritise communities and initiatives that are specifically focussed on Digital ID, rather than ID more broadly or more general Business and Human Rights communities.

One additional initiative that Yoti should explore contributing to is that Consumers International and the German Government are organising the Consumer Summit as part of the official agenda for the 2017 G20 meeting being hosted by Germany in July 2017, and making their national campaigns around Consumers

	Rights in the Digital Age (including World Consumer Rights Day in March 2017). This provides an opportunity for Yoti to showcase its approach to consumers, by design and by policies, and actively promote Yoti's principles as part of the solutions that consumers and consumer organisations are looking for in addressing the complex challenges around data. **Action:** Joyce to introduce Julie to Consumers International in London to explore how Yoti can contribute to the Consumer Rights in a Digital Age theme and activities. **Action:** Renata to introduce Julie to relevant contacts in Germany working on this theme as part of the G20 proceedings to explore if and how Yoti can participate and contribute.
4. Other Items	**Guardian Recruitment:** We have been really pleased with the set-up and early work of the Founding Guardian Council over the past year while Yoti has been developing its product and organisation. As we approach our release date for Yoti in app stores, we are thinking that it will make sense once we have a product in the market to restart our recruitment efforts to increase the number of Guardians on the Council. Current Founding Guardians said they would be happy to speak with potential candidates to share experience of the Guardian Council to date as part of the process. **2017 Guardian Council Dates:** To get dates for Guardian Council meetings in the diary for 2017, we are proposing to stick with a similar quarterly schedule (Jan, April, July, Oct), mid-week days scheduled at the end of the business day UK time, as follows: 17 January, 5-7pm UK time 4 April, 5-7pm UK time 6 July, 5-7pm UK time 10 October, 5-7pm UK time
Adjournment	The meeting was called to a close at 1920.

2016 Meeting Attendance													
Meeting Dates	12/1	6/4	6/7	18/10			Yoti Staff	12/1	6/4	6/7	18/10		
Ken Banks	●	●	●	○			Robin Tombs	●	●	●	●		
Renata Avila	●	●	●	●			Duncan Francis	●	●	●	●		
Doc Searls	●	●	●	●			Paco Garcia	●	●	●	●		
Joyce Searls	●	●	●	●			Chris Field	●	●	●	●		
							Ana Castanheira	●	●	●	●		

Yoti Founding Guardians Council Meeting
18 October 2016

							Name							
							Julie Dawson	○	○	●	●			
							Eric Levine	●	●	●	●			
							Emma Butler	⊠	⊠	⊠	●			

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