



# Yoti Guardian Council Meeting

**Attendance:** See Table at end  
**Date:** 27/06/2024 - 15.00 - 17.00

**Location:** Google Hangout  
**Recorder:** KB

## Agenda

- Welcome and thanks to two Guardians for their service at Yoti
- Update on actions from past meetings
- Funding and revenue update
- Yoti new proposition overview
- Update from R&D team
- Updates from Legal/DPO team
  - Proposed Data Project
  - Data Protection considerations/actions
  - Current status of project
  - AI Act
- Update re Content Moderation Assistance with Input from internal Ethics Committee
- AOB
- Close

<b>Welcome and thanking Guardians for their service at Yoti</b>	The Yoti team thanked the two departing Guardians for service on the Guardian’s Council over the past years and their other support for Yoti, e.g. chairing the Yoti Regulatory Roundtables, helping with the recruitment of our next group of Guardians.
<b>Update on actions from past meetings</b>	Minutes for the Guardian Council meeting in March were approved.
<b>Update on actions from past meetings</b>	The Yoti CEO recapped the key theme in our newsletters is meeting our financial targets. Companies on an ongoing basis are expressing their interest in working with Yoti to improve their safety tech provision. Yoti has an active interest in the progression of the European Digital Identity Wallet. A Guardian noted that the team often has to clarify how Yoti verification and user access actually works; particularly in terms of discussions about access to adult content. Yoti team responded that many privacy groups and think tanks are claiming that age verification requires adults to share their full identity documents with adult

	<p>content platforms and so impinges on adults' freedoms. Yoti is responding by explaining that there are a range of approaches, not all require documents and all are data minimised. Yoti is defending the science and ethics of its safety tech and its high privacy; despite those hoping that Yoti's voice will not be heard or heeded particularly outside of the US. Fewer journalists are now conflating facial age estimation with facial recognition. The NIST benchmark study helpfully makes that distinction. Yoti is observing movements within the regulatory sectors where there seems to be a preference for homegrown solutions. Yoti will continue to endeavour to be as transparent as possible.</p> <p>The Guardians asked about Yoti's current US reach and focus.. Yoti is likely to be known by 1 in 20 young people compared to 1 in 3 in the UK. Yoti team explained that in the US Yoti is better known for its age assurance offerings, than identity assurance. This is due to the fact that many social and adult sites are beginning to use Yoti's age assurance products, including well known global platforms and that some large sites use Yoti already e.g. for eSignatures. Certain platforms are holding off from introducing age assurance, concerned that this could significantly reduce the number of users (young people) on their platforms.</p>
<b>Yoti new proposition</b>	<p>Yoti Group Product Manager outlined that the Yoti team has started working on a new proposition and feedback has been sought from certain customers. The Guardians asked for more details in terms of consequences mapping and for an outline of the data protection and consent elements. The team affirmed that privacy is still at the forefront of this new service.</p> <p>Next steps</p> <ol style="list-style-type: none"> <li>1. Validate this proposition with more customers and partners</li> <li>2. Undertake more user testing.</li> <li>3. Share consequences mapping</li> <li>4. Consider potential angles from privacy perspective</li> <li>5. Review terms</li> </ol>
<b>Updates from R&amp;D team.</b>	<p>The Head of Research &amp; Development presented Yoti's NIST submission of their facial age estimation model for independent accuracy testing. They gave background on NIST, their history in evaluating facial recognition and FAE systems, their data testing sets, NIST's results, how Yoti compares to other tested models and why Yoti's and NIST's results differ from one another. They pointed the Guardians to Yoti's publicly available <a href="#">explainer video</a> for further information. ED invited any questions.</p> <p>Discussion:</p> <p>The Guardians noted that the Head of R&amp;D said that models haven't improved much in the last decade and asked if there's a plateau and what reasonable expectations to have over the next decade. They explained that it's not that models haven't improved in general but there's limitations with the data available and for providers to get the most out of the models with this data. This led into a discussion of the use of various publicly available data footage.</p>
<b>Update from the DPO Team</b>	<p>Senior Privacy Counsel and Deputy DPO updated the Guardians in terms of engagement with various regulators.</p>

	<p>The DPO described a joint project proposed by a client in terms of supporting anti-spoofing and fraud prevention. Yoti has considered data protection considerations/actions which have previously been circulated. This could pave the way for similar projects in the future.</p> <p>Clients are asking how Yoti complies with the new AI Act, due to enter into force in July. Yoti is currently undertaking investigations to understand the impact on Yoti.</p> <p>The DPO reassured Guardians that Yoti does not fall into the category of using biometric facial recognition technology in public places.</p> <p><b>Action:</b> Yoti will update the Guardian Council in due course, in terms of an updated impact assessment.</p>
<p><b>Content Moderation Assistance</b></p>	<p>Chief Product Engineer gave an overview of the Content Moderation Assistance /Community Management Tool. They recapped the tool's development, based on feedback from client trust and safety teams focused on identifying and removing non-consensual or copyrighted content and assisting police with potential victims. Many part-time staff with minimal training struggle to understand policies and identify underage or unknown individuals. The goal is to enable content moderators to quickly flag and remove inappropriate content on a range of platforms. All users should give consent for their content, at content upload. It could help with spotting non-consented/ individuals, reporting suspicious content, and identifying CSAM/minors. The team reviewed the tool's use with the internal Ethics Committee to reduce misuse risks.</p> <ol style="list-style-type: none"> <li>1. Developer documentation has been published, and the API is available.</li> <li>2. Efforts are being made to explain the tool in plain English for a non-technical audience</li> </ol> <p>They invited feedback on the current direction and asked for comments or concerns on if this approach can create additional risks to platforms and individuals in terms of how users can express themselves, and if there are any potential risks e.g. censorship</p> <p>The discussion covered several key points regarding Yoti's content moderation tool. The Guardians praised features considering moderator wellbeing and localisation efforts for non-English speaking regions which are being considered internally.</p> <p>A suggestion was made that Yoti could work on a campaign with vulnerable users to encourage sign-ups as a way of safeguarding their likeness.</p> <p><b>Action:</b> Yoti will continue to seek advice from the Guardians as the service progresses and share a video of the live of the service when that is available.</p>
	<p><b>Regulatory Compliance Scanner Tool, 'Level Playing Field' funded by UN End Violence Against Children</b></p> <p><b>Action:</b> This item will be carried over to the next Guardian Council meeting in the</p>

	interests of time.
<b>AOB</b>	<p>One of the Guardians updated on the Data Protection &amp; Digital Information Bill. Despite the general election announcement, the ambition is that the Bill will continue to progress, though it may be the case that the digital identity and smart data elements of the Bill are extracted and put through separately as a smaller bill. During the wrap up period before the dissolution of Parliament, no consensus was reached on Digital ID, due to political differences between the two main parties.</p> <p>For future meetings, the Guardians agreed that the role of Chair will be appointed on a rotating basis at the start of each meeting.</p>

Meeting Dates							Yoti Staff							
Gavin Starks (GS)	●						(RT)	●						
Ken Banks (KB)	●						(JD)	●						
Sindhu Joseph (SJ)	●						(CF)	●						
Seyi Akiwowo (SA)	●						(EH)	●						
Jerry Michalski	●						(ED)	●						
							(AB)	●						
							(OR)	●						

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