s22

From: BOAG,Annan s47E(d) @oaic.gov.au>
Sent: Wednesday, April 16, 2025 10:57 AM
To: s47F <s47E(d) @oaic.gov.au>
Subject: RE: Draft points for 16 April fortnightly meeting with DITRDCA and eSafety [SEC=OFFICIAL]

Hi s47F

s47C

s47C

Annan

From: s47F s47E(d) @oaic.gov.au>
Sent: Tuesday, 15 April 2025 6:17 PM
To: BOAG,Annan <s47E(d)@oaic.gov.au>
Subject: RE: Draft points for 16 April fortnightly meeting with DITRDCA and eSafety [SEC=OFFICIAL]

Hi Annan

s47C

Thanks

s47F (she/her)
Director, Privacy Reform Implementation
Office of the Australian Information Commissioner
Melbourne
P s47E(d) E s47E(d) @oaic.gov.au

Working remotely from Melbourne, Monday to Friday
The OAIC acknowledges Traditional Custodians of Country across Australia and their continuing connection to land, waters and communities. We pay our respect to First Nations people, cultures and Elders past and present.

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From: BOAG,Annan s47E(d) @oaic.gov.au>
Sent: Tuesday, April 15, 2025 6:12 PM
To: s47F <s47E(d @oaic.gov.au>
Subject: RE: Draft points for 16 April fortnightly meeting with DITRDCA and eSafety [SEC=OFFICIAL]

Hi s47F

Okay, if you're comfortable I will skip this meeting. Thanks.

s47C

Annan

From: s47F <s47E(d @oaic.gov.au>
Sent: Tuesday, 15 April 2025 6:08 PM
To: BOAG,Annan <s47E(d)@oaic.gov.au>
Subject: FW: Draft points for 16 April fortnightly meeting with DITRDCA and eSafety [SEC=OFFICIAL]

Hi Annan

s22

s22

Of note, we've sent a follow up email to the department about a PIA. s47C

Thanks

s47F (she/her)
Director, Privacy Reform Implementation
Office of the Australian Information Commissioner
Melbourne
P s47E(d) E s47E(d) @oaic.gov.au

Working remotely from Melbourne, Monday to Friday
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From: s47F s47E(d) @oaic.gov.au>
Sent: Tuesday, April 15, 2025 5:59 PM
To: s47F <s47E(d @oaic.gov.au>
Subject: Draft points for 16 April fortnightly meeting with DITRDCA and eSafety [SEC=OFFICIAL]

Hi s47F

Please find below some points to raise at this meeting tomorrow, yellow highlight in particular, if you agree.

OAIC resourcing and officer-level engagement with eSafety:

- We are meeting with s47F and s47F on Thursday morning for an update on eSafety's approach to consultation
- We provided feedback to eSafety on wording relevant to privacy protections
- Through DP-REG, OAIC and eSafety are finalising a joint statement on Privacy and Online Safety. Planned for publication in May once a government is formed.

PIA

- We have followed up with s47F and s47 at the Dept about the PIA resources circulated by OAIC on 20 March.

Age Assurance Technology Trial (AATT) and insights from the trial for OAIC

- We have accepted an invitation from s47F to receive an update on 28 April regarding the preliminary findings from the AATT.
- We understand from the AATT project plan that this is a pre-planned stakeholder engagement with OAIC.

Regulatory preparedness

- An integrated schedule would be helpful for our planning – s47C ?
- We are progressing papers and having discussions internally about:
  - The relationship between age assurance and the children's online privacy code
  - The privacy risks of age assurance technologies
  - Issues and questions regarding areas of regulatory overlap (aka intersection) between eSafety and OAIC

s47C

Stakeholder consultation on COP Code – insights for SMMA

- s47F to provide any relevant update

Background – recent comms/media/resources/decisions on age assurance

- Recent OAIC comms (relevant to COPC not so much SMMA) – Sunshine and double rainbows – building a better online environment for children and young people | OAIC
- UK - CitizenCard offers 13-15s age assurance, but social media ban for users under 16 on table | Biometric Update
- France - Double blind age assurance requirement for porn sites takes effect in France | Biometric Update
- Articles following the Age Assurance Summit - Age assurance standards approach inflection point as regulations roll out | Biometric Update

Happy to discuss,
s47F

From: s47F
Sent: Friday, 28 February 2025 5:43 PM
To: s47F <s47E(d @oaic.gov.au>
Subject: Draft points for meetings with DITRDCA and eSafety re SMMA and age assurance

Hi s47F

I have jotted down some draft points for your catchups with eSafety/DITRDCA below. The list will evolve meeting by meeting. We can tackle these fortnight by fortnight – not all need to be mentioned at once and new topics and details will come up.

I will populate the last section on Monday and we can discuss on Monday what to prioritise for the afternoon meeting and any information that is missing and that needs tweaking.

The list of potential preparatory activities (see below) are just thought bubbles that I have added to the team task list this week and which we will need to discuss as well before mentioning to DITRDCA/eSafety.

Look forward to talking this through with you,
s47F

Draft points:

OAIC resourcing:

- Taskforce recruitment underway, responsibilities include SMMA implementation.

PIA

- Has a PIA on age assurance been done or will a PIA be done by DITRDCA?
  - ACCS have indicated in their evaluation design report that the Trial is not going to be a PIA.
  - The timing of the PIA might be better once the scope of acceptable technologies is known i.e. following the trial findings and following release of eSafety's guidelines on the reasonable steps to prevent age-restricted users having accounts.
  - The PIA could, amongst other things, then inform any use of s63DA in the Act - The Minister may make legislative rules specifying kinds of information that must not be collected (in addition to the information restrictions already set out in the Act). Before making these rules, the Minister must seek and have regard to advice from the eSafety Commissioner and Information Commissioner.

Age Assurance Technology Trial and insights from the trial for OAIC

- We understand the trial is currently in its test phase (10 February – 17 April per the trial website)
- We will be meeting with s47F from the trial team on 13th March for a briefing on the privacy aspects of testing, in our capacity as an external stakeholder.
- Though we understand it may be challenging to produce this information - in general, we would be interested in any:
  - Consent forms, notices, templates and forms *(as already requested and which the ACCS team have acknowledged they will share when ready)*
  - views that are forming around information that should not be collected for age assurance purposes (this might warrant use of SECT 63DA Information that must not be collected)
  - privacy risks mentioned by individual tech companies themselves, especially around consent, collection for multiple purposes, information destruction etc
  - expectations of privacy or privacy concerns that are articulated by human research subjects (children,

parents and adults) as they test the technologies
- claims that might be misleading (if any) about certain technologies being 'privacy-enhancing', 'privacy-preserving' etc.

s47C

Stakeholder consultation on COP Code – insights for SMMA

- s47F to provide any relevant update

Background – recent comms/media/resources/decisions on age assurance

- OAIC comms - A safer internet doesn't need to compromise privacy | OAIC – 11 Feb
- eSafety report shows widespread underage use of social media and minimal measures to prevent kids signing up | eSafety Commissioner – 20 Feb
- Apple unveils age ID tech before Aus social media ban | Information Age | ACS – 28 Feb
- Age assurance trial casts wide net for world-first scheme (Innovation Aus, 23 Feb)
- Summary of ICO guidance and EDPB statement on age assurance: Age Assurance: Key Insights from the EDPB and ICO – 28 Feb
- Statement: Age Assurance and Children's Access - Ofcom – 16 Jan 2025

Australian Government
Office of the Australian Information Commissioner

Executive brief

To:	Carly Kind – Privacy Commissioner Marcel Savary - General Manager, RIS Branch
Prepared by:	s47F
Through:	s47F
Responsible Executive Member:	Marcel Savary, General Manager, RIS Branch
File ref:	
Date:	June 2025
Subject:	**Age Assurance Technology Trial**

Purpose

To canvas options for surfacing the privacy impacts of age assurance as the Age Assurance Technology Trial (AATT) nears its conclusion.

Background

The AATT is currently in its final stages. DITRDCSA have advised that sections of the draft final report may be circulated to agencies from late June.

DITRDCSA is currently in the process of developing Rules to define which platforms are 'age-restricted social media platforms', and will soon request formal advice from eSafety on this legislative instrument. Once eSafety provide this formal advice to Minister Wells, eSafety will then shift efforts to public and industry consultations on which methods constitute 'reasonable steps' for platforms to take to prevent access to accounts. The reasonable steps will then be set out in eSafety guidance. Platforms are expected to follow this guidance when the law takes effect in December 2025.

The PRISM Taskforce is currently:

- drafting further short feedback to ACCS on the AATT preliminary report, reiterating concerns about overstating the trial's alignment with privacy laws
- awaiting visibility of the final report – including the assessment of individual technologies – ahead of the report being finalised
- scoping and developing privacy materials for regulated entities and individuals in the context of the social media minimum age (SMMA) legislation (as outlined at the 19 May showcase: D2025/007228)
- engaging with relevant areas to plan new and updated documents, such as a regulatory strategy for the broader SMMA work program.

Issues

On 28-29 April 2025, OAIC met with and provided written feedback to ACCS (D2025/006253) regarding their anticipated findings from the AATT. We flagged our concerns with general statements around privacy inferring privacy compliance when that analysis had not taken place.

We have since received and reviewed the longer confidential preliminary report (57 pages - D2025/008669) and references to privacy in this preliminary report still overstate the evaluation that has taken place. There is still no clear statement that the trialled technologies have not been assessed for compliance with Australian privacy laws. References to privacy in the report are extracted at **Attachment A**.

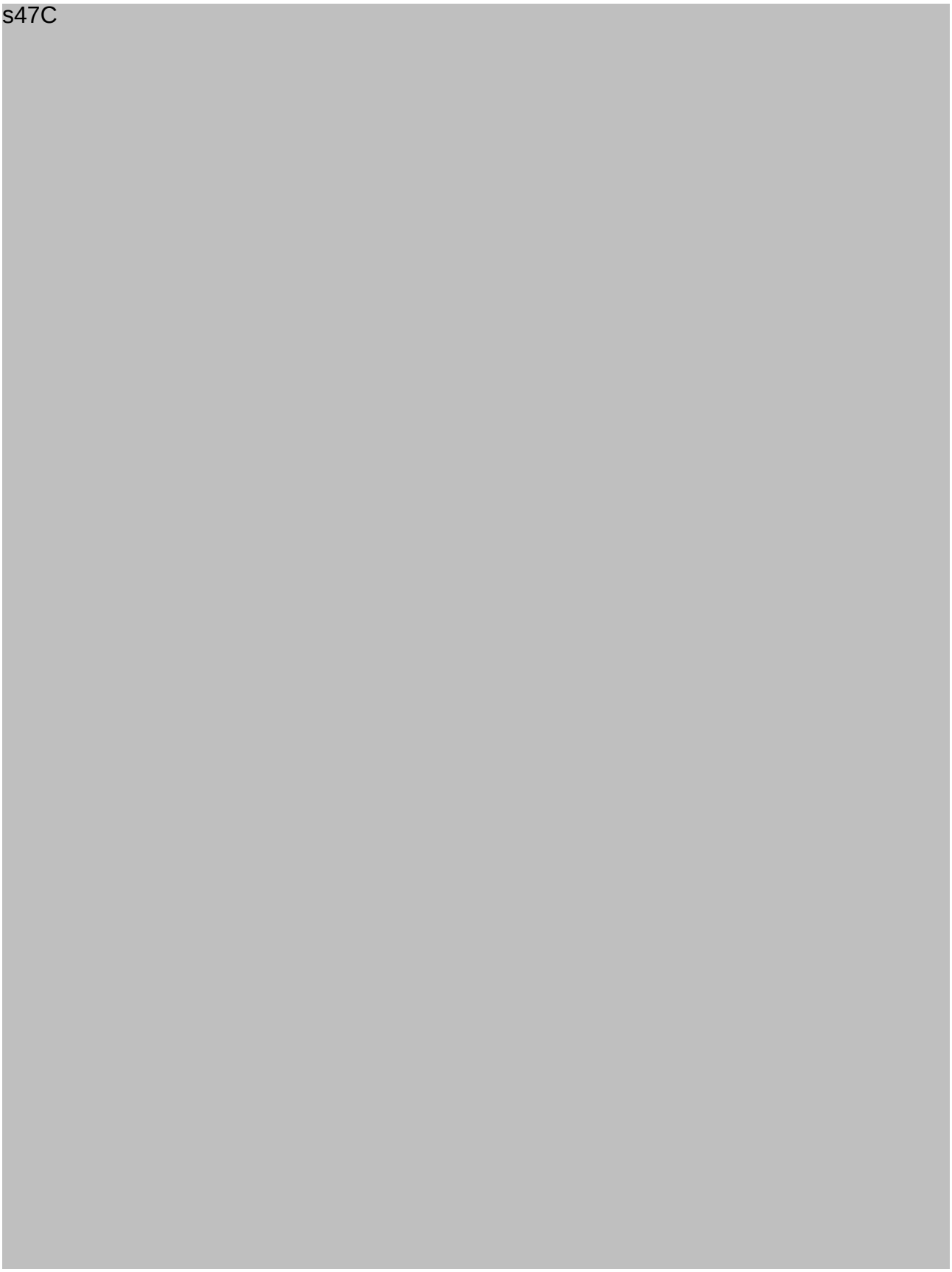
On 3 June 2025, DITRDCSA advised OAIC that, pending Ministerial approval, they are likely to release the anticipated findings of the AATT publicly ahead of the final report, so that the same level of information is shared with Stakeholder Advisory Board members and other industry stakeholders. s47C

s47C

Recommendations for discussion

s47C

s47C



Attachment A

References to privacy and privacy risk in the AATT preliminary report [Confidential]

- Page 6 - 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.
- Page 6 - By evaluating a range of Age Assurance Systems - including Age Analysis, AI-based estimation, parental consent/control and Identity Document verification - the Trial is in the process of assessing the feasibility of these technologies in real-world applications, ensuring they are accurate, user-friendly and privacy preserving.
- Page 7 - Crucially, the trial was designed to operate independently from government and regulators, while still aligning with the policy ambitions of entities such as the eSafety Commissioner, the Office of the Australian Information Commissioner (OAIC) and various legislative frameworks relating to online safety, privacy and child protection.
- Page 7 - As such, the AATT offers a locally grounded, globally informed assessment of how age assurance technologies could be implemented in Australia in a way that is proportionate, privacy-respecting and inclusive of all users.
- Page 8 - Age assurance can be done, consistent with emerging international standards, in the Australian context, conveniently, privately and efficiently.
    - Expanded on page 13 - Age assurance can be done in Australia, this report sets out how our analysis of age assurance systems in the context of Australia demonstrates how they are convenient, privacy-preserving, robust and efficient.
- Page 8 - No noteworthy technological barriers preventing its implementation to meet policy requirements.
    - Expanded on page 13 - We identified careful, critical thinking by providers on the development and deployment of age assurance systems, considering efficacy, privacy, data and security concerns.
- Page 8 - We found robust, appropriate and secure data handling practices.
    - Expanded on Page 13-14 - We found robust understanding of and appropriate internal policy decisions regarding, the handling of personal data by independent age assurance service providers, where a strong commitment to privacy by design principles was found, with careful consideration of what data was to be collected, stored, shared and then disposed of. It was found that separating age assurance services from those of relying parties was useful in maintaining appropriate data handling practices as providers used data only for the necessary and consented purpose of providing the service.
- Page 9 - The evaluation framework included key criteria such as accuracy, reliability, interoperability, ease of use, bias minimisation, privacy protection and data security. The approach has followed international software evaluation standards, with detailed test matrices and governance protocols to ensure consistency, reproducibility and impartiality.
- Page 10 - Analysis focuses on performance variability across demographic groups, accuracy under different usage conditions and compliance with ethical and privacy standards.

- Page 10 - Outcomes are being considered in the broader context of safety, privacy, user experience and regulatory compatibility.
- Page 11 - Ethical principles have underpinned the entire evaluation, guided by values of respect, accountability, fairness, transparency, safeguarding and privacy.
- Page 11 - systems under evaluation are being tested for their own compliance with security and data minimisation expectations in accordance with international technical standards. Systems that fail to meet basic security or privacy expectations will be highlighted for consideration, though these have not been excluded from participation.
- Page 14 - Some providers were found to be building tools to enable regulators, law enforcement or Coroners to retrace the actions taken by individuals to verify their age which could lead to increased risk of privacy breaches due to unnecessary and disproportionate collection and retention of data.

Age verification

- Page 15 - . Providers have demonstrated compliance with recognised standards, responsible approaches to deployment, with strong consideration for privacy, data protection and security.
- Page 16 - We found an understanding and careful consideration of, and appropriate internal policy decisions regarding, the handling of personal data by independent age verification service providers. They all displayed a focus on data minimisation and privacy by design and most providers only retained a secure (hashed) transaction code that did not contain personally identifiable information. Unless relying parties required more detailed information, most providers simply provided a binary 'Yes/No' answer to a question such as, is this person over 18?
- Page 17 - The concept of user-centric holder services provides a verified digital footprint of that individual's activity and cross-verification of that could present privacy concerns, including use beyond the scope of the original consent. We have identified a risk, where the same digital wallet could be used to provide verified credentials for gambling, this could have adverse consequences if that digital footprint were available to a subsequent application for a mortgage as an example, without consent.
- Page 18 - We identified that conducting age assurance checks further from the point of risk—such as at a platformwide or device level—can increase the risk of unauthorised or unconsented use and disclosure of personal information. This is because such approaches often involve collecting and processing data that may not be strictly necessary for the specific activity in question. As a result, users may face unnecessary barriers to accessing content that is otherwise unrestricted and their privacy may be diminished. By contrast, performing verification as close as possible to the activity requiring age assurance ensures that only the minimum necessary data is used for a clearly defined purpose, helping to reduce the likelihood of these unintended consequences.

Age estimation

- Page 19 - Age estimation can be done in Australia and is increasingly being used in existing deployments and integrated into existing services. Advancements in AI and facial, voice and biological analysis, combined with privacy-preserving methods, make it a practical tool for scalable, low-friction age checks across various online and offline contexts. Age estimation technologies in Australia face no noteworthy technological barriers to implementation.

Providers and relying parties have shown thoughtful, responsible deployment practices, with strong attention to privacy, data protection and security. The alignment of technology and policy enables effective, privacy-preserving age estimation that supports age-based requirements without requiring full identity disclosure.

- Page 20 - The desired level of privacy protection would depend on the deployment use case, but these developments highlighted the responsiveness of age estimation service providers to the views of users on privacy-preserving means to prove their age.

Age inference

- Page 23 - Providers and relying parties have approached age inference with careful, responsible deployment, emphasising privacy, data protection and proportionality.
- Page 25 - Providers demonstrated clear separation between operational use, training and validation data, with strong privacy safeguards in place. Signals used to support inference were typically anonymised, securely processed and not retained in a form that could identify individuals. Most providers retained only non-identifying transaction codes. We also observed early-stage development of methods that rely solely on indirect digital indicators - such as browsing habits or interaction histories - to estimate age without revealing identity. While privacy protections vary by deployment context, these developments reflect a strong commitment among age inference providers to respecting user expectations and enabling privacy-preserving age assurance.
- Page 25 - We see strong future potential for age inference technologies to become more seamlessly integrated into in-app, in-game and in-purchase experiences, using natural digital behaviours to infer age in privacypreserving and context-sensitive ways.
- Page 26 - However, user-centric holder services can also introduce risks. If behavioural or inferred data points are linked across contexts, they could create a persistent digital footprint that raises privacy concerns. For example, an age-inferred credential used for accessing gambling platforms could, if not properly protected, influence unrelated applications such as loan or mortgage assessments diminishing user privacy.
- Page 26 - When age inference occurs further from the point of risk - across entire platforms, devices or unrelated services - it risks unnecessary data collection and broader surveillance of online behaviour. This can lead to raising privacy concerns including use beyond the scope of the original consent and potentially limiting access to general content. Proximity to risk helps ensure age inference remains targeted, context-aware and necessary and proportionate collection and use of personal information.
- Page 27 - The data-minimising approach taken by age inference providers - particularly independent, third-party services - helped mitigate the risk of over-collection or retention of personal data in anticipation of future regulatory or investigative requests. These providers typically applied digital footprint analytics on a onetime, context-specific basis, inferring age from a discrete set of behavioural or contextual signals and discarding them immediately after use. This reduced the potential for profiling or surveillance and upheld strong privacy standards.
- Page 27 - However, the sector could benefit from clearer regulatory guidance to ensure that this practice remains the norm and to prevent gradual drift towards persistent data retention or cumulative behavioural tracking. Independent age assurance providers would

benefit from explicit frameworks that balance investigatory needs with privacy-preserving design.

Successive validation

- Page 28 - Successive validation is usually characterised by increasing privacy intrusion, increasing user friction and increasing cost of delivery.
- Page 28 - The process provides inclusion opportunities for young people that are at or near to the age-related eligibility criteria, whilst recognising that it inevitably results in a greater degree of over collection and potential scope creep and disproportionate use of their data and privacy.
- Page 28 - Service providers and policymakers demonstrated thoughtful planning in combining multiple methods to meet age related eligibility requirements. Each step in the validation sequence - particularly near age thresholds - balances privacy, data security and effectiveness and tended to deploy the least privacy intrusive method first.
- Page 29 - While effective for platform-wide policy enforcement, this distant-from-risk validation model carries greater privacy risks. Persistent monitoring across all user activity can lead to collateral intrusion - capturing signals from unrelated behaviours not associated with age-related risk, over collection and potential scope creep and disproportionate use of their data. This highlights the trade-off between continuous oversight and targeted, risk-proximate inference. Clear governance, transparency and limits on data use are essential to balance safety, user rights and privacy in such successive validation models.
- Page 30 - As platforms refine these models, balancing effectiveness with user privacy and proportionality will be critical to sustaining trust and regulatory alignment.
- Page 30 - Providers demonstrated clear separation between operational use, training and validation datasets, ensuring that privacy safeguards were maintained throughout the layered process.
- Page 30 - Most providers stored only non-identifying transaction codes, and some had begun developing privacy-preserving techniques based solely on indirect indicators like browsing habits or interaction sequences. As successive validation escalates - moving from inference to user-declared information and, if necessary, documentary evidence - privacy considerations remain central. Independent providers showed strong design practices that minimise unnecessary data exposure until higher-assurance steps are warranted. This layered approach allows relying parties to align privacy impact with the level of risk, reflecting a mature and user-focused commitment to proportionate age assurance.
- Page 31 - The trial revealed a strong commitment to continuous improvement in successive validation approaches, with providers actively exploring ways to enhance accuracy, user experience and privacy preservation across each stage of the validation process.
- Page 31 - In successive validation, approaches for age assurance, parental control and consent mechanisms play a limited but supportive role. In the early stages, they can provide useful contextual signals - such as devicelevel settings, content restrictions or guardian-managed profiles - that help to infer a likely age range. These indicators contribute to low-friction, privacy-preserving age inference, particularly for younger children.
- Page 32 - However, there are important privacy risks. If these signals become persistent across contexts - such as being reused for unrelated purposes - they may contribute to an unintended digital footprint. For example, inferred age data used to access gambling

content could influence decisions in entirely separate domains, like finance or employment, if not properly governed. To support effective successive validation, interoperability must be balanced with privacy-by-design principles. Systems should enable single-use or context-limited credentials, ensuring that age signals remain proportionate, relevant and non-transferable across unrelated use cases.

- Page 32 - This targeted escalation avoids unnecessary data collection and preserves user privacy by ensuring more intrusive methods are only used when genuinely required. Conversely, when age assurance is conducted far from the risk - such as through broad, always-on monitoring across platforms or devices - it can lead to collateral intrusion into unrelated digital activities. This not only raises privacy concerns such as over collection and potential scope creep and disproportionate use of their data, but also risks restricting access to general, non-age-restricted content and creating an environment of over-surveillance.
- Page 33 - Overall, the trial found that providers are proactively designing layered defences against such attacks, helping to preserve the integrity and trustworthiness of successive validation processes while maintaining user privacy and proportionality.
- Page 33 - Guidance is needed to keep layered systems proportionate and privacy aligned.

<u>Parental control</u>

- Page 35 - In this way, parental control systems can act as a privacy-preserving adjunct to more explicit forms of age assurance. By recognising and leveraging signals from these systems—such as linked child profiles, configured age settings or supervised usage—relying parties may be able to meet regulatory or policy obligations around age-appropriate access, especially where a low-risk, proportional approach is suitable.
- Page 36 - This creates the potential for collateral intrusion into their rights, data and privacy, including over collection and potential scope creep and disproportionate use of their data, underscoring the need for rights-based, child-centric design in future parental control frameworks.
- Page 37 - However, unlike successive validation approaches that are often designed to escalate in a privacypreserving and proportionate sequence, many parental control systems lack nuance and adaptability, applying static restrictions without consideration for a child's age, maturity or evolving capacity.
- Page 37 - Practice statements emphasised a commitment to privacy and data protection, detailing the types of data collected, how it is processed and safeguards to prevent misuse.
- Page 37 - Statements also referenced alignment with relevant privacy legislation, child rights principles and technical standards, with an expressed commitment to ongoing system improvement and transparency.
- Page 39 - As these systems continue to evolve, achieving a balance between effectiveness, child rights, privacy protection and ease of use will be critical.
- Page 39 - We found that parental control systems are generally designed with data privacy in mind, particularly in how they collect and enforce restrictions based on age-related content and usage. Many systems operate with minimal data collection, applying restrictions locally on devices or platforms without transmitting identifiable information externally. Where data is collected - such as for screen time tracking or app usage - it is

often stored in privacy-protective formats, with clear separation between operational functionality and any data used for analytics or product improvement.

- Page 39 - Moreover, the long-term storage of browsing histories raises concerns about proportionality and the child's right to privacy, particularly as they mature. While such features are often marketed as protective, they require careful policy guidance and technical safeguards to ensure that the benefits of transparency for parents do not come at the cost of children's data security or autonomy.
- Page 40 - Future development should focus on co-designing tools with communities, enhancing user support and exploring culturally appropriate mechanisms to extend the benefits of parental control systems in ways that uphold privacy, autonomy and digital safety for all children. The trial revealed a strong commitment to continuous improvement, research and development in the field of parental control systems, with providers actively working to enhance functionality, accessibility and privacy protection.
- Page 40 - This evolution will require a careful balance between effectiveness, usability and privacy, as well as a child-rights-based approach that adapts as children grow, ensuring these tools continue to protect without overreaching.
- Page 41 - During the vendor interview phases, the trial identified several significant privacy, security and child protection risks associated with parental control systems that log browsing activity and record not only the content accessed, but also attempt to access restricted information, resulting in comprehensive logs of a child's interests, concerns and online habits.
- Page 41 - While intended to support parental oversight, such detailed logging can accumulate highly sensitive and intimate data over time - particularly as children explore topics related to health, identity, relationships or development. If not properly governed, this behavioural data raises substantial risks of long-term profiling, loss of privacy and over-surveillance, which can undermine a child's rights and discourage open exploration in the digital environment.
- Page 42 - However, the standard does not specify how parental control should be deployed in a privacy preserving manner reflecting the development rights and needs of children. In an Australian context this would include ensuring any collection of information was fully consented and only collected and used as necessary to meet the control.

<u>Parental consent</u>

- Page 44 - In our analysis of practice statements, we explored a limited number relating to parental consent mechanisms systems although the basis of practice statements under ISO/IEC 27566 does not cover parental consent. As a result, these practice statements reflected growing awareness of the need for legally sound, proportionate and privacy-respecting solutions. Most described how consent was captured, what data was collected in the process and how it was stored. However, very few addressed the child's role or how their rights to privacy and expression were preserved throughout the consent process.
- Page 45 - We found that parental consent systems generally demonstrated careful consideration and appropriate policy decisions regarding the handling of personal data, particularly in contexts where consent is required to enable a child's access to digital services, content or features. Providers typically maintained a clear distinction between

data collected to verify parental authority, consent records and operational data, helping to ensure that privacy safeguards were applied consistently throughout the consent process.

- Page 46 - However, we observed that many implementations treated consent as a one-time static event, with limited support for ongoing data minimisation, consent renewal or withdrawal mechanisms. While privacy was a stated priority, the absence of dynamic consent tools in many services increased the risk of outdated or excessive data retention over time. Overall, effective data handling within parental consent systems reflects a growing recognition of the need for proportional, rights-based practices. To strengthen trust and accountability, providers should continue to enhance transparency, ensure revocability and adopt privacy-by-design principles that align with the evolving needs of children and families in digital environments.
- Page 47 - To ensure these systems evolve effectively, greater interoperability, privacy safeguards and alignment with diverse caregiving arrangements will be essential. Continued innovation must focus on creating consent mechanisms that are adaptive, inclusive and respectful of both the child's rights and the family's context. The trial revealed a strong commitment to continuous improvement, research and development in the field of parental consent mechanisms, with providers actively working to enhance usability, accessibility and privacy protection. There is growing recognition that parental consent systems must evolve beyond static, one-time permissions toward more dynamic, context-aware and inclusive frameworks that reflect the diversity of family structures, cultural norms and legal guardianship arrangements.
- Page 47 - The trial did not find widespread deployment of parental consent mechanisms at the stack level, highlighting an opportunity for more integrated, cross-platform approaches in the future - so long as they preserve user autonomy, legal integrity and privacy.
- Page 48 - Proximity to risk also helps minimise unintended intrusions into a child's broader digital experience. Because consent is requested only when needed, it avoids the over-application of controls or continuous monitoring that may infringe on a child's rights to privacy, exploration and expression. This targeted approach helps uphold the principles of data minimisation and proportionality, ensuring that interventions match the level of risk and that children are not unduly restricted in their access to beneficial, ageappropriate content. In this way, parental consent - when well-designed - can serve as a balanced safeguard that protects children while respecting their growing autonomy
- Page 48 - Although parental consent is not inherently intrusive, if consent logs are not properly governed, they may include sensitive metadata - such as timestamps, service types, device identifiers or even inferred maturity levels. Over time, this information can be used to draw inferences about a child's age, habits and life stage, potentially exposing them to privacy risks or targeted profiling. If improperly shared, insecurely stored or used beyond the original purpose, these records could become a vulnerability point for misuse - by advertisers, third parties or in more concerning scenarios, by those seeking to manipulate or exploit the child. To mitigate these risks, systems must ensure that consent records are minimal, time-limited and purpose-bound, with clear policies for secure deletion and safeguards to prevent secondary use.
- Page 49 - Unlike parental controls, where few dedicated standards exist, we were able to identify an established international standard that offers practical guidance relevant to the design and implementation of parental consent systems: ISO/IEC 29184:2020 – Online privacy notices and consent. This standard, while not written exclusively for parental

consent, provides clear expectations for how digital services should obtain and manage consent, particularly where users may have limited capacity - such as children. It sets out good practice for the presentation of online privacy notices and the obtaining of informed, meaningful and revocable consent in a transparent and accountable way.

Tech stack deployments

- Page 51 - Device-level and network-level solutions may offer broader coverage across services but raise questions about user privacy and control. The most developed concept (app-store based model) could theoretically enforce minimum age thresholds across multiple apps and websites, provided age verification occurs independently and data is interoperable. However, the current lack of adoption by key platform operators, such as Apple and Google and the absence of independently verified user age data, mean these approaches remain unproven. Further development and testing would be required to assess their effectiveness, feasibility and privacy impacts.

Attachment B

Recent national and international media coverage on age assurance

Australia:

- *TikTok fires shot in social media war, putting heat on the federal government's crackdown - The Australian – 2 June 2025. See D2025/008664*
- *Tech trial for Australia's social media ban 'broadly on track' amid concerns under-16s could circumvent systems | Social media | The Guardian – 30 May 2025*
- *Australia's Age Assurance Technology Trial is halfway done | Biometric Update – 22 May 2025*

International:

- *Canadian lawmakers consider age verification, estimation for online porn access | Biometric Update – 2 June 2025*
- *Spain's digital wallet to be included in EU age assurance app pilot project | Biometric Update – 30 May 2025*
- *Texas puts age verification on app stores despite Apple, Google pushback | Biometric Update – 28 May 2025*
- *European Commission age assurance investigation targets major porn sites | Biometric Update – 28 May 2025*
- *Italian regulator outlines technical methods for EC white label age assurance app | Biometric Update*

Australian Government
Office of the Australian Information Commissioner

PRISM Project Showcase 4 Meeting Minutes

Date:	Thursday, 5 June 2025
Time:	9:15AM – 10:30AM AEDT
Dial-In (TEAMS):	+61 2 7208 4918,,515235816#
Phone conference ID:	515 235 816#
Invitees:	Marcel Savary (Program owner), Carly Kind (Program sponsor), s47F (Meeting chair), s47F , s47F , s47F and s47F
Apologies:	
Link:	

Meeting purpose: To demonstrate progress, share what was achieved during the sprint, and seek feedback on the products or work in progress.

Agenda

1. Acknowledgement of Country – s47F
2. Brief introduction to showcase for new starters (Marcel and s47F) – s47F
3. Reading time (if needed) - 15 minutes

s22

b. Executive brief – Age assurance technology trial – D2025/008665

s22

Attachment A: Meeting Minutes

Task	Team member	Description	Discussion - minutes	Actions
s22				

Task	Team member	Description	Discussion - minutes	Actions
s22				
Executive brief – Age assurance technology trial	s47F	**Background:** This paper has been prepared to canvas options for surfacing the privacy impacts of age assurance **Audience:** Internal **Next steps:** Undertake the activities agreed	• Concerns were re-iterated about the independent AATT preliminary report and language once again inferring legal compliance of technologies. s47C	• s47F to prepare a brief for AGD for their awareness of our concerns • s47F and Marcel to prepare a formal letter to DITRDCSA, outlining concerns about the trial and suggesting next steps

Task	Team member	Description	Discussion - minutes	Actions
		through this discussion **Status:** For discussion	s47C • The outcome we want is for all participants to have an awareness that they will have to comply with Australian privacy laws. s47C	• s47F and s47F to develop a media holding statement to be ready for any media inquiries • s47F to organise a separate 2 hour session to discuss further

Task	Team member	Description	Discussion - minutes	Actions
			s47C	

s22

Task	Team member	Description	Discussion - minutes	Actions
s22				

Task	Team member	Description	Discussion - minutes	Actions
s22				

Task	Team member	Description	Discussion - minutes	Actions
s22				

Other matters to note

- Moving the clearance process to 3 days before the showcase

From: s47F
To: SAVARY,Marcel
Cc: s47F
Subject: Dot points - RE: DITRDCSA/AGD/OAIC - AATT Preliminary findings
Date: Friday, 13 June 2025 9:51:00 AM
Attachments: Re Feedback - Age Assurance Technology Trial - OAIC Preliminary Findings Discussion SECOFFICIAL.msg
RE Feedback - Age Assurance Technology Trial - OAIC Preliminary Findings Discussion SECOFFICIAL.msg
Revised Preliminary Findings following Ethics Review - tracked changes.docx
RE For info - Age Assurance Trial Revised Preliminary Findings following Ethics Review SECOFFICIALSensitive.msg

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Hi Marcel

Following our chat yesterday, please find below the proposed dot points for the meeting with DITRDCSA/AGD/OAIC this morning. Please feel free to tweak/adjust as it suits through the meeting.

I have attached the relevant emails that I have been forwarded (if needed) and separately attached the version of the preliminary findings that s47F provided to us on Wednesday 11 June evening - this is the same version provided by AGD.

Happy to discuss any aspect,
s47F

Dot points:

- Thank you for this meeting. We recognise the immense amount of work that has led to this point.
- Moving to the preliminary findings:
    - As a general point, we'd discourage describing any technology as privacy-preserving or privacy-protecting. As the Privacy Act is principles based legislation, compliance must be assessed in the specific context that a technology is deployed.
    - **Point 2** – no issues, as the changes shift focus to the evaluation to make the tone less definitive
    - **Point 4** – pleased to see this has enhanced wording around the deployment context
    - **Point 6** -
        - the changes go half way but we still think it must be mentioned here that a privacy assessment of technologies was not in scope
        - the reference to 'appropriate data handling practices' in the last sentence also overstates the assessment that has taken place – removing this would convey the same message
    - **Point 10** – pleased to see this has been balanced to reflect context and the need for continuous monitoring
    - **Point 11** – we still feel this is pointing to a very specific privacy and

overcollection risk and this finding should be more explicit that compliance assessments will be required in this area.

- In summary - either the Dept or the Trial documents should be explicit about the privacy assessment that has taken place with reference to Australian privacy laws.
- Our comments are consistent with feedback OAIC provided to ACCS on 29 April and 17 January.
- We look forward to reviewing the draft final report and would be happy to have a further discussion.

-----Original Appointment-----
From: s47F s47F @infrastructure.gov.au>
Sent: Wednesday, 11 June 2025 11:40 AM
To: s47F @ag.gov.au; s47F @ag.gov.au; s47F @ag.gov.au; s47F ; s47F ; s47F ; SAVARY,Marcel; s47F
Subject: DITRDCSA/AGD/OAIC - AATT Preliminary findings [SEC=OFFICIAL]
When: Friday, 13 June 2025 11:00 AM-11:30 AM (UTC+10:00) Canberra, Melbourne, Sydney.
Where: Microsoft Teams

OFFICIAL

Hi all

Putting time in our diaries as per the attached email chain. Please feel free to forward this invite onto anyone else who should be included.

Kind regards
s
s47F
P s47F

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Tenant key: s22

Video ID: s22

More info

For organisers: Meeting options | Reset dial-in PIN

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From: s47F
To: KIND,Carly; s47F
Cc: BOAG,Annan; s47F ; s47F ; s47F
Subject: Re: Feedback - Age Assurance Technology Trial - OAIC Preliminary Findings Discussion [SEC=OFFICIAL]
Date: Wednesday, 11 June 2025 6:56:15 PM
Attachments: image001.jpg
image002.jpg
Revised Preliminary Findings following Ethics Review - tracked changes.docx
Revised Preliminary Findings following Ethics Review.docx

Hi Carly,

I hope that you and the team are well.

Following on from the draft preliminary findings, we have been conducting further ethics and legal reviews and taking on board feedback from the Government, eSafety Commissioner, yourselves and others. As a result, we are making a few amendments to the preliminary findings, which are attached (with a tracked changes version too).

I continue to welcome feedback from you and the team as we work on developing the full report.

Best Regards

s47F

From: KIND,Carly <Carly.Kind@oaic.gov.au>
Sent: 26 May 2025 5:51 AM
To: s47F @accscheme.com>; s47F s47E(d) @oaic.gov.au>
Cc: BOAG,Annan s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>
Subject: RE: Feedback - Age Assurance Technology Trial - OAIC Preliminary Findings Discussion [SEC=OFFICIAL]

Dear s47F

Many thanks for sharing this Preliminary Report, I'm looking forward to reviewing and the team will do the same and forward any feedback that surfaces.

Kind regards,

Carly

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Sent: Sunday, 18 May 2025 7:55 PM
To: s47F s47E(d) @oaic.gov.au>
Cc: KIND,Carly s47E(d) @oaic.gov.au>; BOAG,Annan s47E(d) @oaic.gov.au>; s47F <s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>
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I am, therefore, please to be able to provide to you, in confidence, a final version of our Preliminary Report. You will note that the '14' observations have been refined to '12' observations and it is entirely possible that they will be refined further as we head towards our final report.

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Best Regards

s47

From: s47F s47E(d) @oaic.gov.au>

Sent: 29 April 2025 6:26 AM
To: s47F @accscheme.com>
Cc: KIND,Carly <Carly.Kind@oaic.gov.au>;s47F Annan <s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F <s47E(d) @oaic.gov.au>
Subject: Feedback - Age Assurance Technology Trial - OAIC Preliminary Findings Discussion [SEC=OFFICIAL]

Hi s47

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As discussed in the meeting, our concerns relate to the particular phrasing of the observations and the risk of the inference being that the tested technologies are legally compliant when that level of analysis has not taken place.

For transparency, we would appreciate if refinements could be made to make clear in the observations that the trialled technologies have not been assessed for compliance against the Privacy Act and related legislation such as the privacy provisions in Part 4A of the Online Safety Act. Further detail is provided below.

Broad language inferring privacy compliance

Our concerns centre around the use of relatively broad terms related to privacy that don't appear to be calibrated to the Privacy Act/Australian Privacy Principles (APPs)/related legislation but are more general statements around privacy. For example, 'privacy-preserving', 'appropriate data-handling practices', 'no evidence of exploitative data practices' and 'collateral intrusion to individual privacy'.

Our view is that technologies that involve the handling of personal information cannot be claimed as inherently 'privacy-preserving' or 'appropriate' in the Australian context without applying the APPs (and any related legislation) to the actual context in which the technology operates. Under Australian privacy law, compliance is dependent on a range of contextual variables – such as fairness, proportionality, necessity, whether the relevant standard of consent has been met, the lifecycle of the personal information that is handled, and so on. We can appreciate the draft International Standard has been closely applied noting there are differences between the standard and Australian legal obligations.

We had encouraged analysis of the APPs in the Trial context and a cautious approach to the assessment of privacy in our feedback on 17 January 2025, and while this was incorporated into the final evaluation proposal (p55), the observations could be adjusted to better reflect this. This could be achieved by perhaps reiterating some of the content in the evaluation proposal. For example, it was 'not feasible to perform a comprehensive privacy assessment in this trial' (p55) and 'technical testing for protection of privacy' was

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- Additional queries not raised at the meeting:
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    - Should Observation 14 capture legislative compliance for public trust?

We hope this feedback can be incorporated and look forward to the next steps in this important work, including the opportunity to comment on the draft final report.

Happy to set up another discussion if that would be helpful.

Kind regards,
s47F

s47F (she/her)
Policy and Program Manager | Privacy Reform Implementation
Regulatory Intelligence & Strategy Branch
Office of the Australian Information Commissioner
Sydney | GPO Box 5288 Sydney NSW 2001
P s47E(d) E s47E(d) @oaic.gov.au

The OAIC acknowledges Traditional Custodians of Country across Australia and their continuing connection to land,

waters and communities. We pay our respect to First Nations people, cultures and Elders past and present.

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From: s47F @accscheme.com>
Sent: Monday, 21 April 2025 3:52 PM
To: s47F s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F <s47E(d) @oaic.gov.au>; s47F @avpassociation.com>
Cc: BOAG,Annan s47E(d) @oaic.gov.au>; s47F <s47E(d) @oaic.gov.au>
Subject: Re: Age Assurance Technology Trial - OAIC Preliminary Findings Discussion

Hi s47F

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Age assurance can be done in Australia. This report sets out how our analysis of age assurance systems in the context of Australia demonstrates how they are secure, privacy-preserving, robust and effective. There is a plethora of choice available for providers of age-restricted goods, content, services, venues or spaces to select the most appropriate systems for their use case.

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We found no technological impediment to age assurance technologies being utilised in response to age-related eligibility requirements established by policy makers. We identified careful, critical thinking by providers and policy makers on the development and deployment of age assurance systems, considering efficacy, privacy, data and security

concerns. Some systems were easier for initial implementation than others, but they were all eventually capable of integration to a user journey.

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We found deep understanding and appropriate policy decisions regarding the handling of personal data – particularly by independent age assurance service providers, where no evidence of exploitative data practices was found. Separating age assurance services from those of relying parties was useful in maintaining appropriate data handling practices.

7. **There is broad demographic consistency in the operation of the systems.**

The systems under test performed broadly consistently across demographic groups and despite an acknowledged deficit in training age analysis systems with data about indigenous populations, we found no discernible difference in the outcomes for First Nations and Torres Straights Islander Peoples using the age assurance systems. We found variances across race and gender were within tolerable parameters.

8. **There is room for continuous technical improvement including emerging technologies.**

We found opportunities for technological improvement of age assurance systems including through one-way blind access to government verification; enabling connection to data holder services (like digital wallets); and improving the accreditation, certification, continuous monitoring, testing and analysis of the systems in accordance with the evolving international standards.

9. **There are limitations to parental control systems particularly during adolescence.**

Although we found that parental control and consent systems were initially effective, we found limited evidence that they could cope with the evolving capacity of children (particularly through adolescence), were able to enhance the rights of children to participate in the breadth of digital experiences or were effective and secure in the management of a child's digital footprint.

10. **There are innovative, interoperable age token management systems emerging into the marketplace with future potential.**

We found opportunities for holding and managing age assurance results (tokens) at different levels of the technology stack, but none of the solutions offered for the trial have yet reached an appropriate technology readiness level to be able to demonstrate this in practice. This we anticipate will improve as holder services (like digital wallets) enhance their capabilities. The emerging concept of 'app-store' level or 'device' level age assurance was explored and found to lack effective thinking about risks and unintended consequences.

11. **Proximity to risk builds user trust and understanding of the need for age assurance.**

Age assurance activities deployed at or near to the age-related risk provided a clearer linkage for users on the need for the age assurance process. This proximity to risk is an important factor in making the age assurance process trustworthy, transparent and proportionate. We found the potential for collateral intrusion to individual privacy the less proximate age assurance systems were to the risk identified.

12. **Systems demonstrated cybersecurity compliance and most actively counter AI-driven threats.**

We found that the systems tested were secure, well-built and established in accordance with information security management standards. We found an industry that is acutely aware of, planning for and actively defeating artificial intelligence generated threat vectors

– such as presentation attack, video injection attack and document or record forgeries and counterfeits.

13. **We caution against inadvertently promoting unnecessary data retention through audit trails driven by anticipating the future needs of regulators or judicial processes (such as Coroners).**

We found some concerning evidence that service providers were over-anticipating the eventual needs of regulators or judicial processes about providing data for future investigations. Some providers were found to be building tools to enable Regulators, Law Enforcement or Coroners to retrace the actions taken by individuals to verify their age which could lead to potential security vulnerabilities without clear guidance and policy decisions.

14. **Accreditation and certification, enduring system monitoring and recertification of age assurance systems is essential to enhancing public trust.**

The standards-based approach adopted by the Trial, including through the ISO/IEC 27566 Series, the IEEE 2089.1 and the Systems and Software Engineering - Product Quality Model all provide a strong basis for the development of accreditation of conformity assessment and subsequent certification of individual age assurance providers in accordance with Australia's National Quality Infrastructure.

I hope that makes for interesting reading and I look forward to meeting with your team next Monday.

Best Regards

s47F

From:
Sent: Sunday, April 13, 2025 12:37 PM
Subject: Age Assurance Technology Trial - OAIC Preliminary Findings Discussion

---

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Passcode: s22

For organisers: Meeting options

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From: KIND,Carly
To: s47F s47F ; SAVARY,Marcel
Cc: s47F ;s47F ,Leah; s47F
Subject: RE: Feedback - Age Assurance Technology Trial - OAIC Preliminary Findings Discussion [SEC=OFFICIAL]
Date: Thursday, 12 June 2025 9:40:01 AM
Attachments: image001.jpg
image002.jpg

Thanks s47F, we'll review and come back to you with any feedback.

Carly

From: s47F s47F @accscheme.com>
Sent: Wednesday, 11 June 2025 6:55 PM
To: KIND,Carly <s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>
Cc: BOAG,Annan s47E(d) @oaic.gov.au>; s47F <s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>; s47F s47E(d) @oaic.gov.au>
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s47F (she/her)
Policy and Program Manager | Privacy Reform Implementation
Regulatory Intelligence & Strategy Branch
Office of the Australian Information Commissioner
Sydney | GPO Box 5288 Sydney NSW 2001
P s47E(d) E s47E(d) @oaic.gov.au

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evidence of exploitative data practices was found. Separating age assurance services from those of relying parties was useful in maintaining appropriate data handling practices.

7. **There is broad demographic consistency in the operation of the systems.**

The systems under test performed broadly consistently across demographic groups and despite an acknowledged deficit in training age analysis systems with data about indigenous populations, we found no discernible difference in the outcomes for First Nations and Torres Straights Islander Peoples using the age assurance systems. We found variances across race and gender were within tolerable parameters.

8. **There is room for continuous technical improvement including emerging technologies.**

We found opportunities for technological improvement of age assurance systems including through one-way blind access to government verification; enabling connection to data holder services (like digital wallets); and improving the accreditation, certification, continuous monitoring, testing and analysis of the systems in accordance with the evolving international standards.

9. **There are limitations to parental control systems particularly during adolescence.**

Although we found that parental control and consent systems were initially effective, we found limited evidence that they could cope with the evolving capacity of children (particularly through adolescence), were able to enhance the rights of children to participate in the breadth of digital experiences or were effective and secure in the management of a child's digital footprint.

10. **There are innovative, interoperable age token management systems emerging into the marketplace with future potential.**

We found opportunities for holding and managing age assurance results (tokens) at different levels of the technology stack, but none of the solutions offered for the trial have yet reached an appropriate technology readiness level to be able to demonstrate this in practice. This we anticipate will improve as holder services (like digital wallets) enhance their capabilities. The emerging concept of 'app-store' level or 'device' level age assurance was explored and found to lack effective thinking about risks and unintended consequences.

11. **Proximity to risk builds user trust and understanding of the need for age assurance.**

Age assurance activities deployed at or near to the age-related risk provided a clearer linkage for users on the need for the age assurance process. This proximity to risk is an

important factor in making the age assurance process trustworthy, transparent and proportionate. We found the potential for collateral intrusion to individual privacy the less proximate age assurance systems were to the risk identified.

12. **Systems demonstrated cybersecurity compliance and most actively counter AI-driven threats.**

We found that the systems tested were secure, well-built and established in accordance with information security management standards. We found an industry that is acutely aware of, planning for and actively defeating artificial intelligence generated threat vectors – such as presentation attack, video injection attack and document or record forgeries and counterfeits.

13. **We caution against inadvertently promoting unnecessary data retention through audit trails driven by anticipating the future needs of regulators or judicial processes (such as Coroners).**

We found some concerning evidence that service providers were over-anticipating the eventual needs of regulators or judicial processes about providing data for future investigations. Some providers were found to be building tools to enable Regulators, Law Enforcement or Coroners to retrace the actions taken by individuals to verify their age which could lead to potential security vulnerabilities without clear guidance and policy decisions.

14. **Accreditation and certification, enduring system monitoring and recertification of age assurance systems is essential to enhancing public trust.**

The standards-based approach adopted by the Trial, including through the ISO/IEC 27566 Series, the IEEE 2089.1 and the Systems and Software Engineering - Product Quality Model all provide a strong basis for the development of accreditation of conformity assessment and subsequent certification of individual age assurance providers in accordance with Australia's National Quality Infrastructure.

I hope that makes for interesting reading and I look forward to meeting with your team next Monday.

Best Regards

s47F

From:

Sent: Sunday, April 13, 2025 12:37 PM
Subject: Age Assurance Technology Trial - OAIC Preliminary Findings Discussion

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For organisers: Meeting options

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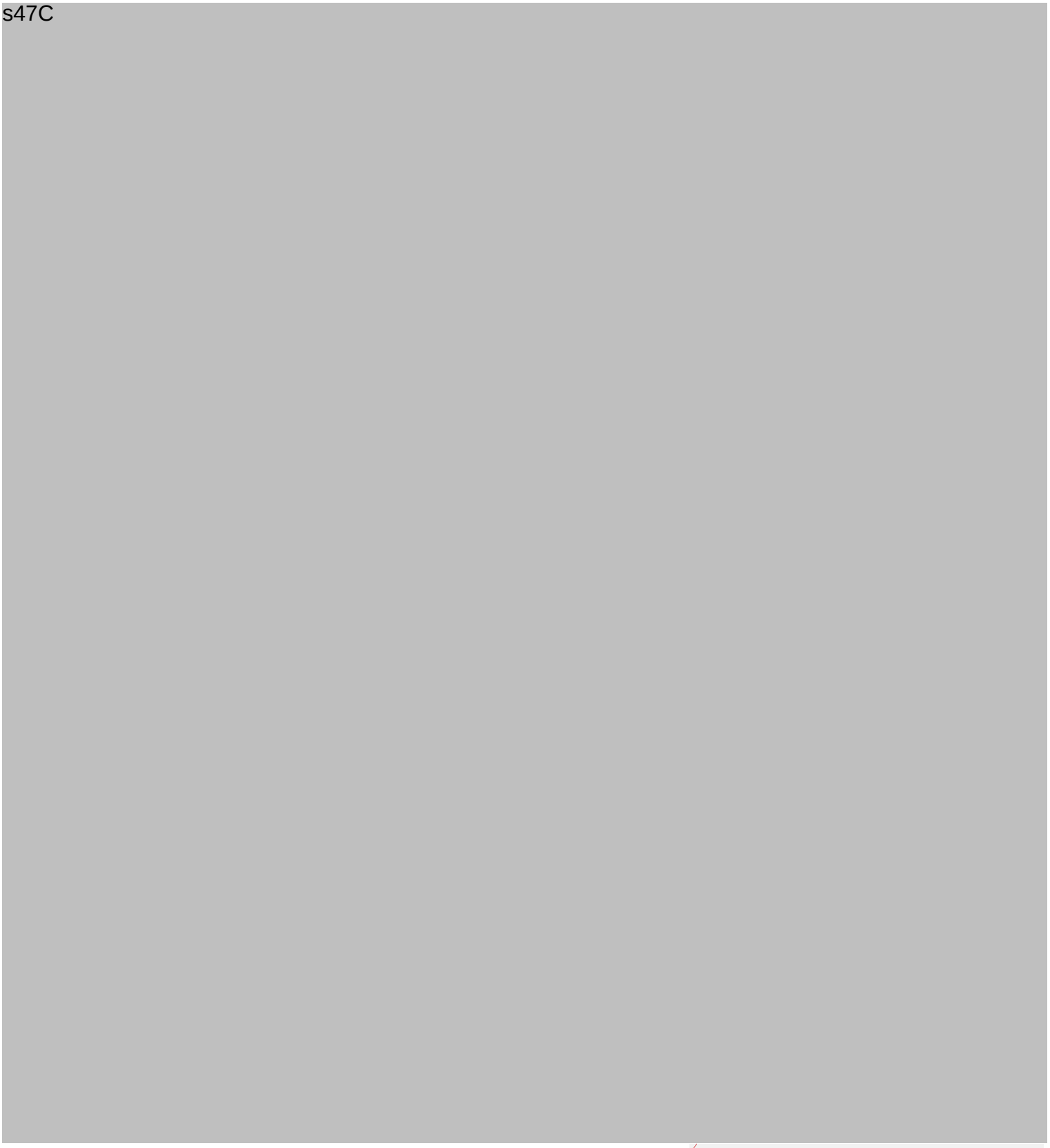
s47C



s47C

s47C

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From: s47F
To:
Cc: s47F s47F s47F s47F ; s47F s47F
Subject: RE: For info - Age Assurance Trial Revised Preliminary Findings following Ethics Review [SEC=OFFICIAL:Sensitive]
Date: Tuesday, 10 June 2025 8:01:38 PM
Attachments: image001.png
image002.png

OFFICIAL:Sensitive

Hi s47F,

The extracts helpful, thanks. As discussed I think the crux of it is that 'mismatch' point, we want the trial to accurately reflect the analysis it's done, while not overstepping into any full legal analysis/privacy impact assessment they haven't done. (Which presumably would need to be done at the point on implementing a particular technology.)

And thanks for the names – the team will look into our calendars and find some times that hopefully can suit all.

Cheers,
s47F

OFFICIAL:Sensitive

From: s47F @ag.gov.au>
Sent: Tuesday, 10 June 2025 6:47 PM
To: s47F @infrastructure.gov.au>
Cc: s47F @infrastructure.gov.au>; s47F s47F @mo.communications.gov.au>; s47F s47F @infrastructure.gov.au>; s47F s47F @infrastructure.gov.au>; s47F s47F @ag.gov.au>; s47F @ag.gov.au>; s47F s47F @ag.gov.au>
Subject: RE: For info - Age Assurance Trial Revised Preliminary Findings following Ethics Review [SEC=OFFICIAL:Sensitive]

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Many thanks s47F – really appreciate this.

I've extracted the OAIC's concern below as expressed to us for your info, in case helpful.

If it's an officer level meeting then from my team we'd like either s47F (M,T, F) or s47F s47F (M, W, Th) and s47F to participate please (all copied).

Thanks again – and always happy to discuss.

s47F

s47F
Assistant Secretary - Privacy Reform Taskforce
Integrity Frameworks Division
Attorney-General's Department | 3-5 National Cct, Barton ACT 2600 | Ngunnawal Country
T: s47F
E: s47F @ag.gov.au

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We have reviewed the preliminary findings of the Trial report and the OAIC is concerned that the report has the potential to mislead readers by overstating the analysis of privacy compliance. Specifically, the OAIC is concerned about the mismatch between the privacy analysis that has taken place in the Trial and the highly conclusive references to the technology being privacy preserving, without detailed analysis of the technology against the Australian Privacy Principles and related legislation. While Trial participants have shown a keen awareness of privacy obligations, there has been no formal assessment of compliance with relevant legislation or any privacy impact assessments conducted.

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From: s47F @infrastructure.gov.au>
Sent: Tuesday, 10 June 2025 6:31 PM
To: s47F ag.gov.au>
Cc: s47F @infrastructure.gov.au>; s47F s47F @mo.communications.gov.au>; s47F s47F @infrastructure.gov.au>; s47F s47F @infrastructure.gov.au>
Subject: For info - Age Assurance Trial Revised Preliminary Findings following Ethics Review [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Hi s47F

As discussed, attached are the preliminary findings of the age assurance trial. Please note these reflect initial findings, and are very much a work in progress, so subject to change before finalisation. I've left them in tracks so that it is easy to see the changes from previous versions that OIAC may have seen.

It would be great if you could share with your OAIC colleagues, but please stress that these are not to be shared outside of Government.

As discussed, my team will also reach out to OAIC to set up a staff level meeting – please let us

know who would like to attend at your end.

-

Cheers,

s47F

-

s47F

Assistant Secretary • Online Safety Branch

• Digital Platforms, Safety and Classification Division

s47F @infrastructure.gov.au

P s47F • M s47F

GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

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I am part time – working 9.30-4.30 Monday and Tuesday, 9-2.30 on Wednesday, and regular hours on Thursday and Friday.

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I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

Ngunnawal Country

-

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From: s47F
To: SAVARY,Marcel; KIND,Carly
Cc: s47F s47F s47F ; s47F
Subject: Meeting Notes - s47F and AGD [SEC=OFFICIAL]
Date: Monday, 16 June 2025 6:07:09 PM
Attachments: image001.jpg
image002.jpg
image004.jpg

Hi Carly, Marcel and PRISM team

Please see below the meeting notes from my in-person meeting with s47F at AGD last Friday. It was a high-level but broad-ranging discussion, I'll save this email in content manager for record keeping.

Thanks

Social Media Minimum Age

- AGD grateful for being looped in on the AATT feedback to DITRDCSA
- Agree with our feedback and our view that age assurance privacy compliance needs to be context and use case specific

s47C

s22

s22

s47F (she/her)
Director, Privacy Reform Implementation
Office of the Australian Information Commissioner
Melbourne
P s47E(d) E s47E(d) @oaic.gov.au

Working remotely from Melbourne, Monday to Friday
The OAIC acknowledges Traditional Custodians of Country across Australia and their continuing connection to land, waters and communities. We pay our respect to First Nations people, cultures and Elders past and present.

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