Your response

Please refer to the sub-questions or prompts in the annex of our call for evidence.

Question	Your response
Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.	*Not confidential* Yoti is a major safety tech company that owns and operates a free digital identity app and online identity platform that allows organisations to verify their age and identity online and in person. Yoti has been live since November 2017 and the Yoti app has already surpassed 12 million installs globally. Yoti has undertaken over 550 million age checks using the Yoti age estimation algorithm since February 2019. In 2022, Yoti became the first Identity Service Provider (IDSP) to be certified to the UK Digital Identity & Attributes Trust Framework (UDKIATF). The UK Government listed Yoti as a 'notable' example of 'high growth success story', and one of the UK's top safety tech employers. We provide age assurance services to social media platforms and adult content sites including Instagram, Yubo, Mindgeek, online gaming sites, dating sites, e-commerce sites, physical retailers and adult gaming centres. In France among others, our technology is used by a variety of social media platforms and adult content sites to comply with the Audiovisual and Media Services Directive. We have developed an age portal so that organisations large and small can integrate and access a wide range of age checking approaches, through one simple integration, in just a couple of hours. This enables organisations which operate globally to assign the appropriate age check methods to each

	jurisdiction and undertake A/B testing with users. It has been designed to enable relying parties to meet requirements such as enabling age appropriate design. This can ensure that young people can access age appropriate materials and do not normally access or get exposed to age inappropriate ads, goods or services. Yoti was the first organisation certified to the UKDIATF and the BBFC's Age Verification Certificate Standard. In addition, Yoti has also been approved by Germany's Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM) and Commission for the Protection of Minors in the Media (KJM) to provide age verification services there. Yoti's Age Estimation has been certified by the Age Check Certification Scheme (ACCS). Users can perform age verification using the Yoti reusable digital identity app, which allows individuals to share verified information about themselves on a granular basis. This can also be done via Yoti's 'embedded' services which allow organisations to add a fully integrated identity verification flow into their website or app. It could also be using Yoti's authentication algorithms such as age estimation. These verification options can be integrated as standalone solutions, or via the Yoti age verification portal offering more choice to the end users and configuration options to organisations. In all verification scenarios, Yoti calculates if the user meets the minimum age requirement to access the website. If the Yoti reusable digital identity app is used, the user scans a Yoti QR code with the Yoti app to share their age attribute. Yoti then generates a hashed age token, which tells the

	website that the user is over the required age. The token and Yoti's record of the individual's age, or characteristic as over an age threshold, only last for the browsing session and do not identify the individual personally. Further, no personal information is shared with the adult site beyond the age attribute, making this a private and secure solution. The user's interaction with the website itself remains entirely anonymous. If Yoti's fully integrated identity verification solution is used, the end user scans or uploads their identity document straight from their web browser or mobile app. An age is computed from the date of birth included in their identity document, and used to establish whether the person is old enough to pass the age verification test. With Yoti's age estimation solution, users simply look into their phone's camera or their computer's webcam, and Yoti Age Scan will estimate their age. The image is captured and securely transmitted to Yoti's server using 256-bit encryption. Then, Yoti's algorithm gives a result in approximately 1.5 seconds. The image is immediately deleted from Yoti's servers and no record of the user is retained. The only output is an anonymous, hashed age token, used to determine if they are old enough to access the age-restricted content material. Yoti has a strong ethical focus, having an internal Ethics & Trust Committee and being a certified B Corporation More on Yoti's approach to privacy, ethical oversight and accuracy can be found in Yoti's May 2022 Age Estimation White Paper. Yoti has also been part of the EU Consent project devising pan-European interoperable infrastructure for age verification and parental consent.

Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?	*Not confidential* No
Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?	*Not confidential* Not applicable
Question 4: What are your governance, accountability and decision-making structures for user and platform safety?	*Not confidential* Not applicable
Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?	*Not confidential* Yoti has been supportive of the work that has been done by regulators to develop the Age Appropriate Design Code, also known as the Children's Code. We believe ensuring compliance with the Code is an important step to making terms of service and public policy statements clear and accessible to all members of the public. In December 2021, the Information Commissioner's Office published an Age Appropriate Design Code Audit Report which rated Yoti as having a 'High' level of age assurance rating. It stated that Yoti offers 'a high level of assurance that processes and procedures are in place, that the organisation is in conformance with the Age Appropriate Design Code and are delivering data protection compliance.'
Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?	*Not confidential* Not applicable

Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?	*Not confidential* As previously stated, Yoti's age verification technology has been fully or partially audited by a number of trusted, independent third party organisations such as the Information Commissioner's Office, the British Board of Film Classification, the Age Check Certification Scheme, Digital Identity Systems Certification, and Germany's Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM) and Commission for the Protection of Minors in the Media (KJM). We believe that a healthy and independent network of trusted third party auditors could be a solution to ensuring that providers of online service can be assessed to ensure their compliance with transparency and accessibility requirements. This would also allow for the burden of auditing thousands of sites to be shared between Ofcom and others.
Question 8: If your service has *reporting or flagging* mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?	*Not confidential* Not applicable
Question 9: If your service has a *complaints* mechanism in place, how are these processes designed and maintained?	*Not confidential* Not applicable
Question 10: What action does your service take in response to *reports* or *complaints*?	*Not confidential* Not applicable
Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?	*Not confidential* Not applicable

Question 12: What automated moderation systems do you have in place around illegal content?	*Not confidential* Not applicable
Question 13: How do you use human moderators to identify and assess illegal content?	*Not confidential* Not applicable
Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?	*Not confidential* Not applicable
Question 15: In what instances is illegal content removed from your service?	*Not confidential* Not applicable
Question 16: Do you use other tools to reduce the visibility and impact of illegal content?	*Not confidential* Not applicable
Question 17: What other sanctions or disincentives do you employ against users who post illegal content?	*Not confidential* Not applicable

Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?	*Not confidential* Not applicable
Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm from illegal content?	*Not confidential* Not applicable
Question 20: How do you support the safety and wellbeing of your users as regards illegal content?	*Not confidential* Not applicable
Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?	*Not confidential* Not applicable
Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?	*Confidential*

Question 23: Can you identify factors which might indicate that a service is likely to attract child users?	*Not confidential* Not applicable

Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?	*Not confidential* As stated above, we are a provider of age assurance and age verification tools to a large range of in person and online service and content providers. Our May 2022 Yoti Age Estimation White Paper, which is available to the public, provides more information about how technology works. This includes information about our age estimation technology, as well as its accuracy levels, our commitment to the ethical use of our technology, and how we work to train our dataset to make it more inclusive. We of course would be delighted to provide more information on how our technology works that Ofcom would require.
Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?	*Not confidential* Not applicable
Question 26: What information do you have about the age of your users?	*Not confidential* The Yoti platform is designed so that all user data is encrypted with a key on the user's phone, and can only be read or shared by the user themselves. No Yoti staff have the ability to decrypt the data, and we cannot mine or sell user data to third parties.
Question 27: For purposes of transparency, what type of information is useful/not useful? Why?	*Not confidential* When a user uses a Yoti service to prove their age online, the only information we pass on to the site or vendor is that that person is above or below a given age, e.g. 18 years of age, or

that they are of a certain age bracket e.g. 13-17 years.

To give more detail -

- We do not store:
  - Biometric data
  - Text or images of an individual's face or ID document
  - Device data, such as an IP address or browser information

- Data we do store:
  - A shared ID to determine if a user has verified their age before.
  - The method of age verification used
  - The type of liveness checks performed
  - The type of authenticity checks performed
  - The time the check took place
  - A unique ID that provides an audit of internal decisions performed to produce a token (no images or text).

We are strong believers in data minimisation and user privacy, and that we believe it is best for sites or providers to be able to access as little information about their users besides what is required as possible.

We believe there is no justification for a site to request to know which city or a month a person was born in, or which citizenship they hold. All they need and should be able to know is that the user is of the age they require their users to be in order to access content or a service.

This is critical for trust, on which the whole Online Safety regime will rely. If users do not feel that they can trust that their personal information

Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?	*Not confidential* Not applicable

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