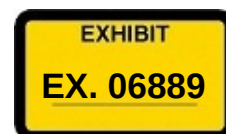


Produced in Native





Age Assurance Discussion

June 3, 2024

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G

Objective for today

Goals

1. Level-set on current state of protections for minors and evolving industry expectations
2. Decide on Google's preferred approach to age assurance and whether to go there proactively or advocate for an industry-wide approach

Non-goals

1. Google's approach to supporting the ecosystem with age signals - this will be a future conversation
2. Exact shape of our regulatory & industry engagement model as it depends on what approach we're willing to take internally



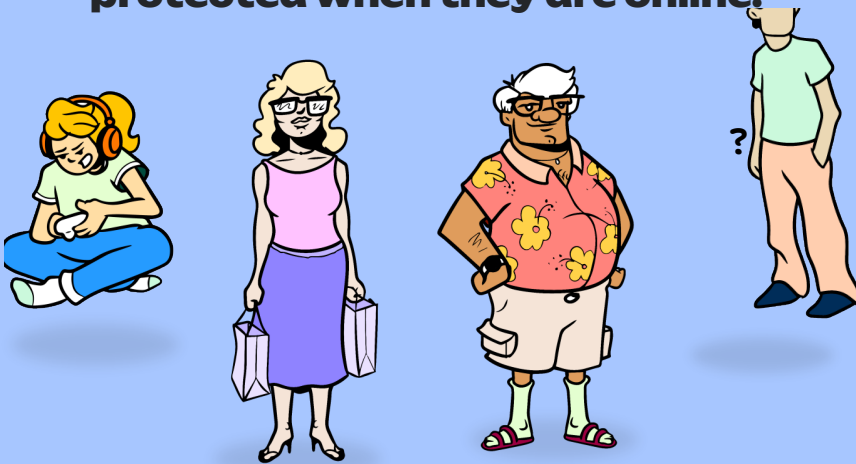
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Current product protections



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We want to ensure that everyone is protected when they are online.



Taking a deeper look at how we apply these principles in our product development practices means that

- When it comes to protect, we're focused on protecting kids and teens from bad actors & bad actions online;
 - Encouraging access to age-appropriate content; and
 - Supporting the agency of kids and teens over their data
-
- For respect, it begins with us respecting their different backgrounds by providing a diverse set of experiences; and
 - Providing parents, caregivers and teens with flexible tools so that they have the ability to choose the options and experiences that fit the needs of their particular family.

And finally, when it comes to Empower,

- It's us working to make sure our products enable easy navigation for kids and teens;
- Promote their agency through age-appropriate opportunities for them to express and connect; and
- Fostering opportunities for them to learn and set their imagination free to discover !

Today we have a baseline of protections for all users

CSAM detection & removal

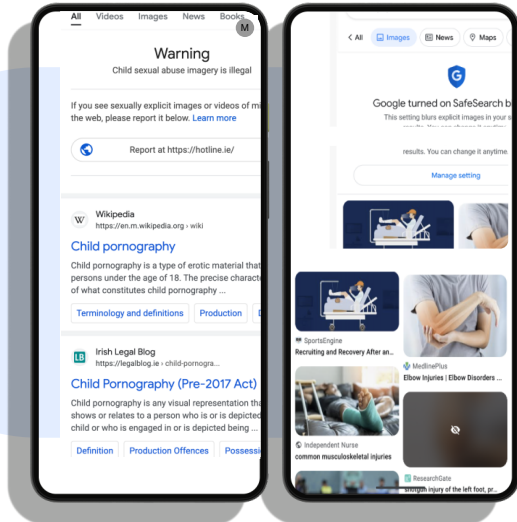
- Hash matching and AI classifiers
- CSAM-seeking OneBox interventions

Content policy

- SafeSearch Blur by default
- YouTube Community Guidelines
- Help seeking support (OneBox)
- Reporting mechanisms

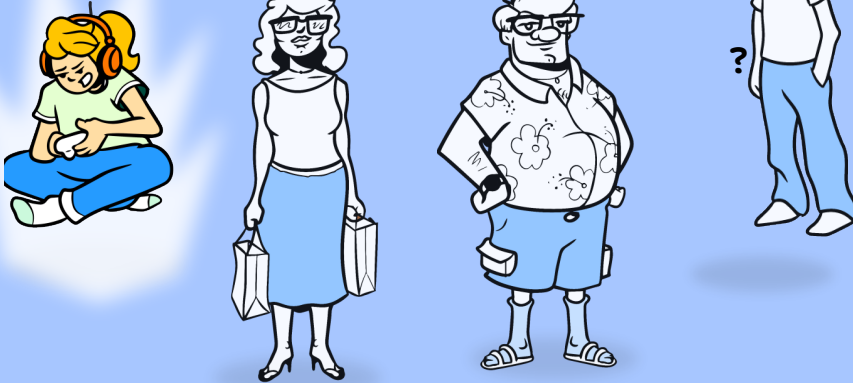
Protecting against bad actors

- Ability to block contacts across Google Dialler, Messages, Meet, Chat, Gmail (no direct messages in YT)
- YT Comment Classifier (CSAM, CE)



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**For known minors, we provide
additional age-appropriate
protections**



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Additional protections for known minors

PROTECT

- 1 Reduce exposure to harmful content with SafeSearch Filter on, YouTube minor-specific content protections, Play AO app restrictions, Ads age-sensitive categories blocked
- 2 Ads personalization disabled
- 3 Search minor image removal requests
- 4 YT participation protections e.g. comments classifiers, comment blocking, vulnerable channels

RESPECT

- 5 Family Link parental controls allows parents to set downtime, control which apps are downloaded, locate device
- 6 YouTube digital wellbeing tools on by default - take-a-break & bedtime on; autoplay off; upload default to private
- 7 Digital education programs e.g. Be Internet Awesome, YouTube teen content creation guide

EMPOWER

- 8 Tailored experiences for younger kids like YouTube Kids, Google Kids Space and Play Teacher Approved apps
- 9 Supporting the classroom with YouTube learning, Practice Sets, Google Classroom
- 10 Designing GenAI for teens with additional content protections, transparency and a focus on learning journeys



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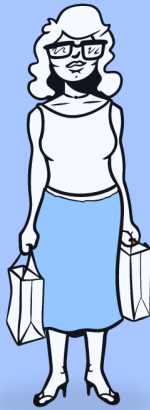
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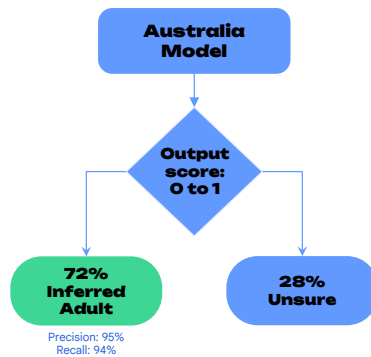
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...but what if we don't have a confirmed age?





In Australia we implemented an age gate based on adult inference



Access to mature content only if inferred (or verified) Adult

Signed-in only

- YouTube mature content
- Play 18+ rated content
- Ads mature ads

Analogous to real world where certain activities or content (e.g. buying alcohol, gambling, getting a tattoo) are age restricted.

Challenges

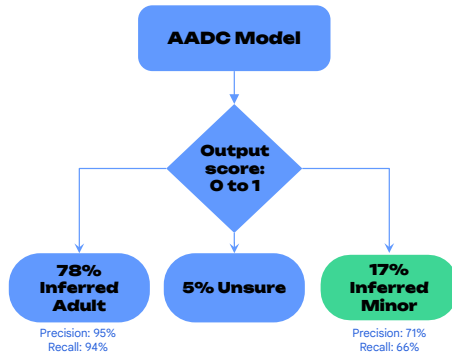
- Narrow scope of mature content



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In Europe we've implemented a model to identify minors and apply protections



Apply Global Minor Protections

Signed in & signed out

- Mature content restrictions (YouTube, Play, Ads)
- SafeSearch filter ON by default
- Ads personalization OFF
- YouTube upload default private & VIBE applied
- Settings review (p13n, digital wellbeing)

Challenges

- ~5% of all adults inferred minors (~30% of inferred minors are actually adults)
- Lack of good paths to fully personalized experience after reaching/verifying >18 (work underway)
- EEA regulatory requirements remain unsettled; pressure for additional granularity, proof of efficacy and exploration of "double-blind" methods



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Double click: Graduation

Minors who subsequently turn 18 don't have good paths to fully personalized experience (incl Ads p13n)

Backlog of 114M adult users

(growing 59M year) with Ads p13n off due to prior minor status

Previously declared <18

~96M
Currently

~52M
Growth per year

EEA, UK or CH

Previously inferred minors but referred / verified >18

~18M
Currently

~7M
Growth per year

Will grow if we roll out
inference to new markets

Next steps

Teams across Ads, Core & Finance are working on a proposal to

1. Encourage users to enable settings after leaving Minor Mode
2. Set settings to pre-Minor Mode, where legally permissible
3. Default settings to on with notice, where legally permissible

Will need commitments from Search, YouTube and Play to support in-product interstitials to impacted users.



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Evolving industry expectations

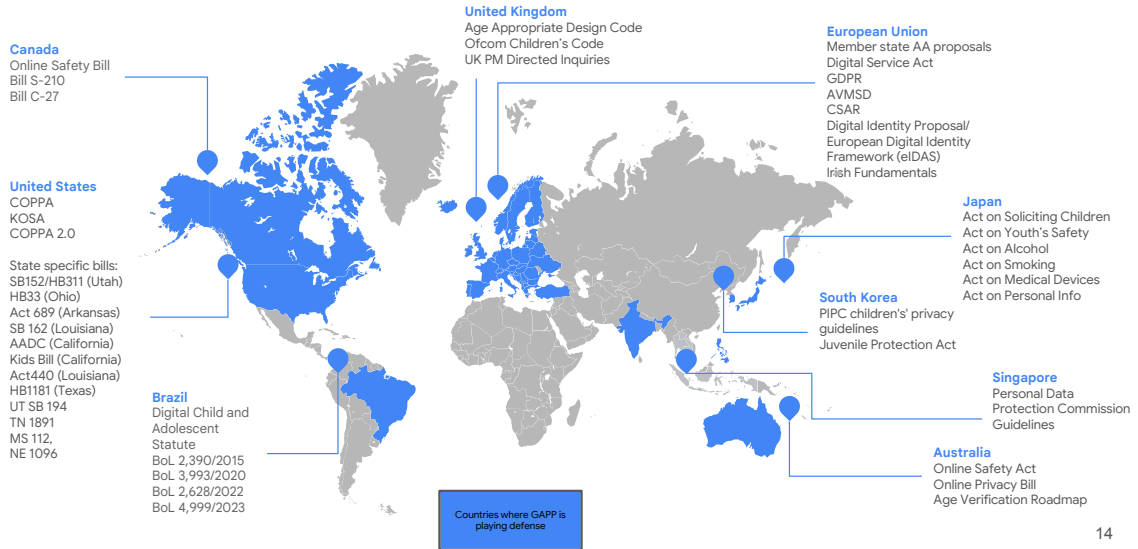


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Increasing Momentum for Action



Significant global debate on age assurance; diverse proposals



Capability not built

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Examples of policy proposals under discussion

Rough projection: 2-6 varied proposals could pass in 2024; accelerating in 2025

Proposal Type	Description	Select Markets/ Campaigns	Comments on Business Impact
Play Store	Regulatory proposals placing age-gating requirements on Apple and Google, and/or requiring platforms offer age signals/parental consent management for 3P app developers.	UK, India, Singapore Meta Campaign	Significant eng. lift; possible Google liability
On-Device	Seeking to have Apple and Google to verify and offer age signals to 3Ps at the device/OS level.	UK, Spain	No current scalable means to do so, and would require industry standards to create signals; possible liability; some loss of control for our users
Double-blind Tokens	Requires tech companies to ingest signals from a third party and/or gvt entity via a double blind token designed to preserve privacy.	EU, France	Tech still in development and unproven. Dependent on creation of technical standards (which takes time)
Digital Govt. IDs	Requires tech companies to ingest an age signal from a government-backed digital ID.	EU, Spain, Japan	Adoption low today; could build on existing infra
Hard IDs	Requires tech companies to ask users for a government-issued hard ID in order to verify age.	South Korea, UK	User drop-off high, esp. in signed out
3P Vendors	Requires tech companies to only utilize third party signals to verify or estimate age (i.e. Yoti).	Germany, US	High cost to contract 3P
Age Estimation	Requires tech companies to better understand a user's age using commercially reasonable methods, which could include Google's age inference model.	US, Brazil, Singapore	Infrastructure built but need to tune inference model

Global Affairs

Antigone Davis, Vice President, Global Head of Safety at Meta

“Parental approval for teens under 16 on the app store: Require app stores to get parental approval for teens under 16 to download an app.

Empowering parents to approve their teens’ app downloads ensures that they oversee their teens’ online experience. Placing the point of approval within the app store simplifies the process and leverages optional approval systems already offered by app stores. App stores would notify parents and request their approval when their teen wants to download an app, including Instagram.”

Source: [A framework for legislation to support parents and protect teens online](#)

Meta’s Campaign for App Store Age Verification



Meta (supported by TikTok, Snap, Match) has launched an aggressive, global campaign to outsource age verification to app stores. We have so far prevented Meta from establishing specific requirements, but they have created significant new policy focus on platform-based age assurance solutions.

KOFs have expressed support in private conversations across multiple jurisdictions, including the UK (Sunak in conversation with Ruth), Denmark (in preparation for EU Presidency), France (meeting request from Education Minister), India, British Columbia, and Louisiana.

A credible alternative is needed to counter this narrative, which is successfully creating interest in platforms taking on responsibility for age.

Options for global path forward



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Problems to solve

User

Protecting minors on our platforms

TODAY

Outside Australia & Europe, we rely on declared age and our baseline of protections

Regulatory

Acceptance of age inference as an age assurance method

TODAY

Patchwork of regulatory proposals with some very problematic approaches

Industry

Leveling the playing field & protecting minors on all platforms

TODAY

Going alone can hurt our ecosystem and create competitive disadvantages



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We believe in a risk-based approach when requiring age assurance

From our [Legislative Framework to Protect Children and Teens Online](#)



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Be risk-based

More data-intrusive methods should be limited to high-risk services

Preserve users' access to information and services

- Avoids treating all users like children
- Avoids impinging on the ability of adults to access information

Respect users' privacy

- Preserves the potential for anonymous or pseudonymous experiences
- Avoid requiring collection or processing of additional personal information

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Decision 1: Age assurance

What is our preferred approach to age assurance?

Age Gating vs **Identify Minors**

Decision 2: Sequencing

What is the best way to bring the industry along?

Proactive vs **With Industry**

level the playing field



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Objective: Need to add decision two. Best way to level the playing across the industry

Decision 1: Age assurance



Adults
Only!

Age Gating

“Option B”

Age-gate certain content or features
until user is confirmed an adult

VS



Identify Minors

“Option C (updated)”

Use age inference to identify minors
and apply global minor protections



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Decision 1: Age assurance

Age Gating

“Option B”



Age-gate certain high risk content or features until user is confirmed an adult

Users with an unconfirmed age should be restricted from certain high risk content or features but should not be assumed to be a minor. Level of age confirmation should be commensurate with risk.

Approach on 1P product (signed in only)

Adaptation of Australia approach to age-gate certain high risks

Use of inference model allows >94% of adults to seamlessly access age-gated content / features, remainder given options to verify.

For example:

Play - adult-only apps
YouTube - mature content
Search - no change (rely on baseline protections)

Support industry by allowing sharing of 'verified adult' age signal via Android/Play, Chrome and Sign in with Google (SiWG).

Financial impact



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Decision 1: Age assurance

Identify Minors

“Option C”
(updated)



Platforms should seek to understand when there are minors on their platform and provide age-appropriate content & feature protections

Users with an unconfirmed age should be restricted from highest risk content & features (same as option B) but should not be assumed to be a minor.

Approach on 1P product (signed in only)

Adaptation of EEA approach which minimizes # of adults misclassified as minors

For signed-in users, run inference model and if we have high confidence user is a minor (e.g. precision >95%) apply minor protections*

- Estimate putting ~7% users into minor state
- Acknowledge will not identify all minors (especially at boundary)

*Variation 1: Align to current global minor protections (slide 7) Financial impact

Variation 2: Focus on minor content protections (no change to p13n) Financial impact



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Decision 2: Sequencing

Proactive

Take action on 1P products
in parallel to industry effort

vs

Industry

Advocate for an industry approach;
no 1P action at this time



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Age assurance		
Option Set	Age-gating (Option B)	Identify minors (Option C)
Sequencing	Proactive Take action on 1P products in parallel to industry effort	User ++ : Applies our minor protections to more users Regulatory ++ : Leadership position Industry -- : Significant ecosystem impact & unlevel playing field
	Industry Advocate for an industry approach; no 1P action at this time	User - : No impact now Regulatory +- : May not be sufficient or timely enough to meet external pressures Industry + : Levels playing field outside Europe to age gate highest risks on all platforms



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Appendix



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Three potential paths forward for 1P Age Assurance

Option A

PLAN OF RECORD

Roll out inference only where required

Driven by level of regulatory uncertainty around age assurance requirements and ecosystem impacts

Need to improve graduation i.e. % of users once eligible for adult treatment moving into highest functionality & personalized state (today <5%)

Option B

AUSTRALIA (modified)

Roll out of adult inference for content

What we could say: For consumption of mature content on YouTube & Play we run additional checks to confirm a user is over 18

Some concerns. Potential slippery slope e.g. being required to age-gate more content or products or use inference in more use cases

Finance assessment (signed in only)

Option C

EEA (modified)

Roll out of minor inference

What we could say: We proactively seek to identify minors on our platforms and apply special protections including turning on mature content restrictions and blocking ads personalization

Some concerns. Significant ecosystem impact, adults incorrectly inferred minor + need to improve path to fully personalized experience after turning 18

Finance assessment (signed in only)



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Framework for User Risk — focus on protections from a child-development perspective

DRAFT UNDER DEVELOPMENT

	Contact Risk of harms from bad actors and bad interactions	Content Risk of consumption* or creation of harmful content	Commercial Risk of purchasing harmful products	Data Risk of data misuse / privacy infringement	Use Risk of excessive or disruptive use
Age Gating can help prevent harm (Adult Use Cases)	High Risk: Direct/private contact with bad actors in an adult context Sample Mitigation: Gate access to apps primarily associated with making romantic adult connections	High Risk: Consumption* of explicit/excessively violent content Sample Mitigation: Gate access to consumption of content that is sexually explicit, excessive violence/gore	High Risk: Purchase of adult-only products or services Sample Mitigation: Gate purchases of adult and regulated goods/activities (drugs, tobacco, alcohol, gambling)		
Identifying Minors can help mitigate harm, but other rights have to be balanced (e.g. can be beneficial or necessary application of feature/content)	High Risk: Negative or harmful interactions (bullying, harassment, grooming)	High Risk: Encouragement of unhealthy, aggressive, or antisocial behavior (e.g. self harm); negative body image; or other mental health impacts Sample Mitigation: Dispersion of certain content	Medium Risk: Exposure (eg via discovery) to commercial content or ads relating to mature or inappropriate products or sensitive categories; inability to distinguish commercial content. Sample Mitigation: Ad content restrictions	Medium Risk: Data accessed inappropriately could be used for harm; sharing PII Sample Mitigation: Privacy defaults	Medium Risk: Excessive screen time Sample Mitigation: Autoplay off
Example Mitigations irrespective of age	Speedbumps	Prohibit pornography/suicide content	Labeling content as ads	Transparency & control	Digital wellbeing tools



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*Consumption does not include solely seeing an image, ad, or preview / fleeting interaction

Play Store / OS takeaways

- There is increasing pressure from social media (Meta & TikTok) to use the OS/Play store for age signals
 - Most versions would put unworkable constraints on the OS and pass both significant liability and expense to Google.
 - Unworkable if all users need an age signal otherwise they have to be treated as a child. Burden on Play Store because uptake of digital IDs is very low so either we bear the \$ costs of age estimation like selfie or we externalize our inference model signal where concern is accuracy & liability.
 - We do have a few ideas that we're just starting to dig on, including carrier signals and parent permissions to share age signals with developers



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