Ofcom Technology Notices consultation on policy proposals for minimum standards of accuracy for accredited technologies: A response from Videntifier

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About Videntifier Technologies ehf

Videntifier builds video identification tools and solutions that can help organizations accurately identify and address illegal content online. Since 2012, our unrivaled technology has helped organizations such as online platforms, law enforcement, and CSAM hotlines efficiently navigate the heavy influx of illegal content posted online every day.

Question 1: Do you have any views on our audit-based assessment, including our proposed principles, objectives, and the scoring system? Please provide evidence to support your response.

No comments

Question 2: Do you have any views on our proposals for independent performance testing, including the two mechanisms for setting thresholds; the approach to testing technologies in categories against particular metrics; and data considerations? Please provide evidence to support your response.

We feel there is a need to further adapt your approach to categorisation to take account of the differences between hash-matching and other technologies.

You propose to create categories based on the type of content (CSEA and terrorism) and then to further categorise by hashes, images, text, URLs and video.

Hash-matching technologies, and the way in which they are used, are completely agnostic as to the content of the files being matched (whether it be terrorism, CSEA or something else). But the proposals suggest that a hash-matching technology would need to be entered into separate categories for CSEA and terrorism, which might represent wasted effort and (depending on the charging scheme adopted) could have cost implications for the technology supplier and/or the accreditation scheme operator.

Additionally, the proposals on categorisation do not specify the use of a particular dataset for testing hash-matching technologies. This is a major omission, because hash-matching only ‘works’ in the context of an appropriately comprehensive and high quality hash database. A

platform operator could deliberately choose to implement an accredited hash-matching technology in conjunction with a less comprehensive database, in the knowledge that this would produce fewer matches requiring review (and would therefore be cheaper to operator).

Conversely, the use of a low quality hash database (eg containing high volumes of non-validated material) may produce many instances of false positives – even if the hash-matching technology is highly performant.

We therefore recommend that:

- When hash-matching technology providers self-assess, they should be mandated to use specific named industry databases and to report results against those databases. Alternatively, a standardised test database could be provided
- Independent testing should similarly use a standardised test database
- Ofcom should seek to accredit specific databases for CSEA and terror content which are known to be comprehensive and high quality, and to ensure that platform operators are required to use these along with accredited hash-matching technologies

Question 3: Do you have any comments on what Ofcom might consider in terms of how long technologies should be accredited for and how often technologies should be given the opportunity to apply for accreditation? Is there any further evidence we should consider?

No comments

Question 4: Do you have any views on how to turn these proposals into an operational accreditation scheme, including the practicalities of submitting technology for accreditation? Is there any additional evidence that you think we should consider? Please provide any information that may be relevant.

We hope that Ofcom will seek to create a level playing field for small technology providers through its accreditation scheme, in terms of cost and complexity, bearing in mind that the largest providers (some of which are also platform operators) are far more able to absorb any costs proposed. We hope that Ofcom will seek early views from small providers on fees, in particular.