Your response

Question	Your response
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	Confidential? – N Using Ofcom's proposed audit-based assessment to accredit technologies for use in a Technology Notice is laid out as part of the overall process for assessing technologies that might be used to identify and tackle Child Sexual Abuse and Exploitation (CSAE) or terrorism content on what the UK Government's Online Safety Act is calling Part 3 services i.e. user to user services and search services. Based on the evidence presented it makes sense to prioritise **principles** over prescriptive rules to allow flexibility. This, along with the **objectives** within the proposed evaluative framework enhances the assessment accreditation scheme that is being proposed. The scoring system of the evaluation framework is described clearly in sufficient detail and makes sense. The only question we have in considering this section is the lower aggregated score given for the **maintainability principle** in the context that there would be an expectation that technologies would be periodically reviewed and therefore maintainability is less important in this context. However, given that re-accreditation in this context is proposed once every four years - a relatively long period in the context of today's fast-evolving technology landscape, the relative low weighting of maintainability appears at odds with this and perhaps should be slightly higher to reflect the pace of change. The proposal and rationale for the overall minimum aggregated score of 60 is concisely explained but raised some questions. If a minimum aggregated score can be achieved by an applicant technology that provides evidence that only half of the objectives have been comprehensively met; and only some, but limited evidence in the other objectives, then this seems to violate the overall principle of robustness. On this basis, there could potentially be greater confidence in the technology if the overall minimum aggregated score was higher. Some adjustment to the individual principle and objective scores may be required in the upwards direction to allow for this increase.

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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.	The proposal to have a supplementary or augmentative independent performance testing mechanism appears to be sensible for the reasons stated within the consultation proposals. This would help provide a level of corroboration and triangulation of the overall evidence for a technology to be accredited. The two mechanisms for setting thresholds are clearly described - the prescribed and benchmarked and the rationales for preferring the latter to the former are clearly articulated. The technicalities of the approach to testing technologies is out with the scope of expertise of this response and we are not able to comment further regarding any of the specific metrics and data scores.
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?	The initial reaction is that the period of four years for a technology to be accredited for appears to be quite lengthy considering the rapid pace of technological change in this area. There may be a risk, therefore, that as technology rapidly evolves, what has been accredited three or more years ago, or even two years previously may become outdated and potentially not fit for purpose. It is helpful to know that the four-year period would not preclude companies applying for reaccreditation earlier. The use of a standardised accreditation window to accept applications appears to be sensible and it is helpful to hear that Ofcom is considering that it may be appropriate to open this accreditation window every two years. Given the rapidly changing technology environment it may be prudent to adopt this measure.
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.	This not an area that CELCIS has any level of expertise in, in terms of how an operational accreditation scheme for technology submissions would work, so we are not able to comment further.

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Question 5: Do you have any comments on our draft Technology Notice Guidance?	The draft appears helpful and is clear about the guidance Ofcom will follow with respect to Technology Notices. It is helpful that a clear distinction has been made between enforcement powers in general and Technology Notices specifically, and that use of the latter tool can be exercised without the need to open an enforcement investigation. The outline of the process that may apply and the case-by-case nature of this is clear.

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