

Consultation: *Modernising and Harmonising Classification Standards*
Submitted to: Department of Infrastructure, Transport, Regional Development,
Communications, Sport and the Arts – Australian Government
Submitter: Claire Henry, Associate Professor in Screen and Australian Research Council
DECRA Fellow ('Tackling the consumption of sexual violence on screen')¹
Organisation: Flinders University
Date: 29 May 2026

Executive summary

This submission is supportive of the goals for reform – particularly enhancing clarity, consistency, transparency, and accessibility – and the intention “to protect without overreach, inform without censorship, and reflect Australia’s diversity” (p.1). Recognising the goal of this review as incremental improvement (as opposed to a system overhaul), the feedback here is limited to the 22 changes proposed in the report, *Update to modernise and harmonise classification guidelines 2025*.

There are underpinning tensions in the Australian classification system that are unlikely to be resolved with this light-touch reform; namely, whether the purpose of the classification system is ultimately to *inform* (consumers) or *protect* (children and/or society), and how it balances *community concerns* and *evidence-based harm*. The proposed shift toward relying on evidence over morality (C03) is a positive signal, but its implications are not fully explored. Without clarity on how harm evidence will be prioritised where it conflicts with offence or discomfort, there is a risk that reforms may introduce instability, inconsistency, or unintended overreach.

The identified priorities for change based on community and stakeholder input (p.1) are unsurprising and generally represent reasonable, achievable and overdue areas to address in this update. They are generally well served by the proposed changes, but some concepts veer toward a recommendation service and overreach on deciding age suitability (C01, C16, C19). The report lacks consideration of legally restricted categories at the upper end of the classification system (R18+, X18+) and does not address critical issues of the impracticality of enforcement in the contemporary media environment. Framed as “practical renewal, not a redesign” (p.1), this review is limited in its ability to fix the identified structural and systemic challenges (p.3).

The submission broadly endorses improvements to system transparency, database functionality and public education, which are likely to deliver immediate public benefit and foster usability and trust. However, proposals that introduce additional granularity, symbolic icons, or expanded self-classification should proceed cautiously to avoid undermining the system’s long-standing strengths of simplicity, recognisability and legitimacy.

Overall, the submission supports modernisation and harmonisation but emphasises the need for conceptual clarity and robust oversight mechanisms to ensure Australia’s classification system is relevant and consistent and continues to be widely recognised and trusted.

¹ Associate Professor Claire Henry is the recipient of an Australian Research Council DECRA Fellowship (DE250101193). The views expressed herein are those of the author and are not necessarily those of the Australian Government or Australian Research Council.

1. Guidelines updates (C01-C08)

The most consequential proposed reforms sit within this domain, as these concepts collectively determine the logic of classification rather than merely its administration.

Several proposals represent significant conceptual shifts while being framed as incremental or technical changes. In particular, the proposed changes to ratings (C01, C05) risk undermining one of the Australian system's long-recognised strengths: its simplicity and high public literacy. The report asserts that people value the familiarity of existing categories yet simultaneously proposes introducing an **additional age rating of PG13 (C01)**. Increased granularity can create confusion rather than clarity, especially when age-based distinctions exceed what a harm-informed system can meaningfully justify. Certainly, a system based on an evidence-based harm framework (C03) should protect children from exposure to content that is clearly only suitable for adult audiences, but it does not follow that granular age-referenced categories are either necessary or useful. The system currently puts some responsibility on parents/caregivers for "parental guidance" and to seek out further information about the media text if needed – this should remain the right and responsibility of parents/caregivers (whose individual children and their sensitivities will vary considerably). It is not the Scheme's role to select precise age appropriateness on behalf of Australian parents/caregivers, even if parents/caregivers struggle with decisions about age suitability when selecting films for their children. The given justification for C01 is "to help consumers work out if something is appropriate for their age" (p.16) but a granular age-recommendation system is not the purview of harms-based (C03) media regulation. The system's emphasis should be on informing about content (where there is an evidence-based risk of harm), rather than deciding on precise age appropriateness.

The shift from **MA15+ to MA16+ (C05)** may usefully harmonise the system with other legislation such as the Online Safety Act, however, this tweak would dent the valuable familiarity of existing ratings and raises questions about how the rating of previously classified MA15+ content would be updated (presumably not with a quick transfer, which would suggest material previously deemed suitable for 15-year-olds is now only suitable for 16-year-olds and above). Any changes to Australia's ratings should take into account regional responsibilities, for example, the impact it may have on cross-rating in Aotearoa New Zealand (where the Film & Video Labelling Body relies on Australian unrestricted ratings of G, PG and M to assign the equivalent New Zealand ratings).

The **overhaul of the "Themes" element (C02)** raises unresolved questions about stability, governance, and conceptual coherence. While delineating "Themes" into priority areas such as sexual violence, suicide and discrimination may respond to community concern (and avoid the vague unhelpfulness of descriptors such as "strong themes"), it is unclear how such themes would be defined, updated over time, or applied across legacy content. Without stability, consumers may struggle to interpret older classifications, weakening longitudinal trust in the system. There is also a lack of clarity about the relationship between classifiable elements and consumer advice, and about how thematic labels differ from depictions. For example, sexual violence falls under the classifiable element of violence, but is proposed to be also specified as one of the themes – this raises the question of how labelling will distinguish between the two ('sexual violence themes' and 'sexual violence'?). Incorporating impact level (e.g. 'strong') is a valuable aspect of the Australian system,

and the reform process might also consider the precision of terms (potentially drawing on Aotearoa New Zealand's now more precise labelling for sexual violence).

The proposed **shift toward evidence-based harm over morality (C03)** is welcomed as an important signal. However, the report does not fully reckon with the depth of change this implies. Considering that one of the “matters to be considered in classification” under the Act (s11) is “the standards of morality, decency and propriety generally accepted by reasonable adults,” C03 represents a foundational shift that is not adequately reflected in the report's framing and proposed concepts. Notably the report also phases out “artistic merit” (similarly listed in s11 of the Act) without full consideration of the implications (p. 14). The tension between offence, discomfort, and demonstrable harm appears throughout the report but is not resolved. For example, it is evident in the unpacking of “themes” (C02) with the proposed addition of “scariness”, which may be a popular warning among parents but is not necessarily harmful (and what children of different ages and cultural backgrounds find scary can be very variable).

Reforms relating to **interactivity (C04)** address long called-for changes to the harsher treatment of video games and appropriately recognise that not all interactivity carries the same risk. However, the emphasis on “real-world replication” (e.g. gambling mechanics) raises enforceability and boundary questions that are not acknowledged. The report does not address how such distinctions would be operationalised consistently, especially in global digital markets where Australian law has limited reach.

The proposal to **align publication classifications with film and games (C06)** improves surface consistency but risks flattening historically distinct regulatory logics. Publications have long operated under different assumptions about circulation, access, and enforcement, and transition planning for legacy titles is not addressed. There may be nuances between the categories that prevent straightforward mapping as proposed, which should be further considered in consultation with industry and audiences for relevant publications as well as through case study testing.

Finally, **changes to sexual content classification (C08)** are among the most significant reforms proposed and address long called-for changes to the treatment of fetish or kink-related acts as well as potential discriminatory treatment of non-heteronormative sexual content. The commitment to consistency across identities is welcome, and this change is in line with the proposed effort to shift to an evidence-based, harm-informed framework over a moral one (C03).

2. Process reform (C09-C12)

The process reforms aim to modernise classification workflows and reduce regulatory burden, but several proposals risk weakening public trust if safeguards are under-specified.

The **Classification Advisory Council (C09)** is proposed as a mechanism for community input, yet there is little detail about its composition, appointment processes, scope of influence, or relationship to existing decision-making bodies. Experience in comparable jurisdictions (e.g. New Zealand's Youth Advisory Panel) suggests such mechanisms can be valuable, but only when their remit and representativeness are clearly articulated. The absence of parallel mechanisms for systematic industry input is also notable, given the scheme must function for both community and industry

stakeholders. There are alternative consultation and input mechanisms that could be considered to capture a wider range of views and better reflect the values of transparency, inclusiveness and reflecting Australia's diversity. In Aotearoa New Zealand, for example, members of the public can apply for a review of a classification decision for a low fee, whereas in Australia, [eligibility is limited and the fee is \\$10,000](#).

The **classify-once principle (C10)** improves efficiency and consistency but implicitly assumes that screening context and community attitudes remain static. The proposal to **update classifications only when content changes (C11)** does not account for shifts in social norms, nor does it address how older classifications will remain meaningful over time. As noted above, s11 of the Act requires several specific "matters to be taken into account in making a decision on the classification" that are not immutable (including moral standards and artistic or educational merit).

The expansion of **self-classification as the default model (C12)** raises the most significant questions of governance. While efficiency gains are clear, the report provides insufficient detail on audit mechanisms, training, thresholds for escalation, or the future role of the Classification Board. Without visible, robust oversight, this shift risks undermining the legitimacy and trust that underpin the system.

3. Technology and access (C13-C17)

Proposals in this domain are largely uncontroversial and overdue, and for the most part align well with the stated goals of clarity, accessibility, and efficiency.

Improvements to the **classification database (C13)**, including unified listings, better search functionality, and reduced duplication, would likely deliver immediate public benefit. Similarly, improvements to website usability through **uniform matrices and clearer listing structures (C15, C17)** address long-standing functionality issues. The expansion of **automated classification tools (C14)** supports industry compliance but also intersects with process reform in ways the report does not fully acknowledge. Streamlining is necessary in a media environment with significant volumes of content, but independent human oversight remains key. The development and adoption of AI classification technologies is likely to be costly and if automated tools proved unreliable, it would undermine the centrally important trust in the system. Classification is a matter of expert judgement that requires significant nuanced understanding of the type of media, the context, the consumers, and potential harms. Hence, any moves toward self-classification (C12) or automated classification tools (C14) must take care not to undermine the role of government regulators and mechanisms for stakeholder consultation and review.

The proposal for **personalised user preferences (C16)** raises questions about scope creep: a classification system is not a recommendation or filtering system, and care is needed to avoid overreach. While efforts to enhance website functionality and accessibility are welcome, C16 (along with C19 and C20) do not appear to offer good value for the significant resourcing involved in establishing and maintaining them. The resourcing could be redirected to **multilingual consumer advice**, which was mentioned in the report (p.3) but not committed to in the 22 concepts.

4. Communication and education (C18-C22)

The report correctly identifies transparency and education as central to trust, and C18 and C22 are well aligned with community and industry feedback.

Greater **transparency of decisions (C18)** is likely to improve confidence in the system among both industry stakeholders and public end-users (with bonus value for researchers and historians). Providing short explanations of why a rating was given responds directly to expressed public need. Transparency becomes an issue in the proposal to include external **community information sources (C19)** on the website. This raises governance questions about which groups are selected, whose perspectives are privileged, and whether linking to overseas organisations is appropriate for a national scheme. With the proposed transparency and accessibility improvements included as part of this reform, the embedding of external sources on the website – which adds risk and requires additional resources – should not be necessary.

Proposals to introduce **element icons (C20)** and **QR codes (C21)** are not clearly justified. Icons risk oversimplifying complex content, are visually busy (even if capped to 3 icons), and require their own literacy. It is unclear how sensitive issues such as sexual violence would be meaningfully represented symbolically, or whether icons can fulfil public desire for clarity. Plain language consumer advice is preferable to symbolic shorthand, particularly when the public have called for more detailed information about the intensity of content. The report states that “Most adults and children agreed that showing the severity of content warnings, such as labelling something as ‘mild’ or ‘strong’, is helpful” (p.16) yet icons don’t signal the impact level. These pictograms resemble hazard labels (though will not have the easy interpretability or wide recognition that the best of these achieve), which may seem a logical fit considering the move to a harm-based system, but consumer advice is conceptually *informative* rather than *prohibitive* and thus should have a neutral rather than ‘warning’ design. If the use of icons is to achieve brevity and recognisability, the use of 1-2 letters (as often used in broadcasting classification systems internationally) would avoid some of the pitfalls of pictograms.

The proposed **national education campaign (C22)** is strongly supported and would become particularly important if ratings categories or symbols change. Education offers better long-term value than several other proposed concepts and it aligns with the goal of helping Australians make informed choices. System literacy is important to build understanding amongst the Australian public and maintain the wide recognisability of the classification symbols.

Concluding recommendations

With greater attention to conceptual coherence and governance safeguards, the proposed reforms can strengthen rather than destabilise a system that Australians continue to rely on to make informed choices in an increasingly complex media landscape.

- 1. Clarify the system's purpose and decision-making framework**

Articulate whether the Scheme's primary role is to inform, protect, or balance both, and define how evidence-based harm will be prioritised when in tension with offence or community standards.

- 2. Preserve simplicity and avoid unnecessary expansion of classification features**

Maintain the system's core strengths of recognisability and usability by limiting additional age categories, symbolic icons, or website features that risk reducing public comprehension and trust.

- 3. Embed robust governance and oversight, particularly for self-classification**

Establish transparent structures, robust audit mechanisms, and clearly defined roles for advisory bodies and regulators to ensure accountability and maintain confidence in the system.

- 4. Ensure consistency, stability, and clear transition planning**

Provide precise definitions and implementation guidance for any changes to ratings, themes, or descriptors, including strategies for legacy content to support long-term coherence.

- 5. Prioritise high-impact reforms that enhance transparency and public understanding**

Focus resources on measures such as improved database functionality, plain-language consumer advice, multilingual access, and sustained public education, rather than lower-value or higher-risk features that extend beyond the Scheme's core remit.

I would welcome the opportunity to contribute further to subsequent stages of reform where my research and expertise may be of value.

Acknowledgements: Claire Henry acknowledges with appreciation the discussion and feedback from Flinders University colleagues Prof Julia Erhart, Dr Nicholas Godfrey and Prof Chris Hay, PhD students Niamh Prendergast and George Cunningham, and Dr Michael Daubs (University of Otago).

© Flinders University 2026 [CC BY 4.0](#)

Suggested citation: Henry, Claire. 2026. *Submission to the Australian Government consultation on Modernising and Harmonising Classification Standards*. Adelaide: Flinders University.
<https://doi.org/10.25957/bbee-7z17>