ASSOCIATED CHRISTIAN SCHOOLS

life through Christian education

Enhancing Online Safety for Children
Submission

Associated Christian Schools: Organisational Principles

1. Associated Christian Schools value the diversity of Australian faith based schools, with respect to governance, diversity of faith, and independence, and the right of parents in their choice of school for the education of their children.

2. Associated Christian Schools support faith based schools continuing to be autonomous and independent, in their understanding of the instruction provided by schools and the ability to teach within their own educational and faith based interpretation, while being fully accountable with requirements to state and federal governments.

3. Associated Christian Schools support the ability of faith based schools to be innovative in their practices towards demonstrable improvements in student learning.

Introduction

Associated Christian Schools (ACS) comprises twenty-nine independent faith-based member schools, with approximately 20,223 students enrolled. Nineteen of the twenty-nine member schools are located in regional or remote areas of Queensland. Member schools of Associated Christian Schools have a diverse student profile, which is reflected in both the geolocation of the schools and its share of students with higher educational needs (disadvantaged, indigenous, students with disabilities and students with a second language).

Associated Christian Schools acknowledges and appreciates the support provided by the Federal Government of faith based schools. We also value the opportunity to make this submission, on behalf of Associated Christian Schools, to enhancing Online Safety for Children. ACS supports effective, credible and feasible measures to protect our children.

This response is framed within the context of the range of measures proposed:

- the establishment of a Children's e-Safety Commissioner;
- developing an effective complaints system, backed by legislation, to get harmful material down fast from large social media sites, and
- examining existing Commonwealth legislation to determine whether to create a new, simplified cyber-bullying offence.

General Comments

Although the Internet has transformed the way our world operates, it has also served as a venue for cyber bullying. Globally and in Australia, Cyber bullying is becoming an increasing problem. This problem is prevalent not only for school children, but indeed across the spectrum of business, entertainment, political and church world. There is a need to address challenging behaviors, development and interaction around the issue of cyber bullying. Cyber bullying has been defined as *"[A] repeated or sustained pattern of intentional cyber-attacks that causes distress and is directed against a specific student or group. Cyber bullying can also be a multi-faceted or multi-step campaign of humiliation or hostility that causes distress and is directed against a specific student or group"* (McGrath, 2009). ACS acknowledges the research findings which report that cyber bullying emerges

most commonly from relationship problems and victims experience powerfully negative effects, especially in relation to their social efficacy (Hoff and Mitchell, 2009).

Within the school context, ACS members acknowledge their duty of care to take reasonable steps to protect students from harm that could have been reasonably foreseen, including those that may be encountered within the online learning environment. However, ACS is concerned about the potential for overreach and vagueness of some of the standards proposed in the discussion paper. ACS members have written processes with respect to appropriate conduct of staff and students. They demonstrate these processes through existing accountability and reporting requirements, contained in the Cyclical Review process, as legislated by the Queensland Non State Schools Accreditation Board. ACS does not, therefore, support measures that increase or duplicate existing legislation and reporting requirements, and subsequently overload employees' workload within member schools.

The discussion paper only refers to the enhancement of online safety for children. ACS suggests that there is a need for considering the same issues for adults, such as at risk as per Articles 18 and 19 outlined in the Declaration of Human Rights (http://www.un.org/en/documents/udhr/). This issue is particularly important for those at risk, such as Disability or other Special Health Needs groups, as well as those of Race, Ethnicity and National Origin.

Specific responses framed within the range of measures proposed:

1.   Establishment of a Children's e-Safety Commissioner

ACS supports the best practice principals outlined in the Discussion Paper to ensure that there is no unnecessary increase of government organizations, that there is clear application of existing accountability and legislative measures, and streamlined resources to minimize red tape.

With respect to the options provided in the discussion paper, ACS supports Option 4 (designation of a non-government organization with expertise in online child safety). However, we strongly suggest that the government give consideration as to whether this

function can be designated to an existing non-government organization with expertise in online child safety that includes representatives from industry, government and public society. This option would, as suggested, be selected on a competitive basis, operating under contractual arrangements, thus removing any political bias and establishing a multi-stakeholder model. This type of NGA that involves buy-in from all the stakeholders, would be potentially more powerful than legislation, and also limit the potential for overreach from any one participant.

2.   Rapid removal of material that is harmful to a child from social media sites

Whilst ACS can understand the proposal that there should be laws requiring Internet Service Providers to remove bullying-related material from websites, it is very difficult to create a workable solution when there may be variations amongst providers as to what is bullying content and what is not. In relation to this proposal, the discussion paper does not outline what is considered "harmful". Therefore, ACS suggests that a good place to start would be to initiate consultation with all stakeholders, to determine an appropriate definition of "harmful" content. There are significant differences between what is considered as offensive and what is considered harmful.

From a practical perspective, this proposal may also create timing issues, as to the speed with which deliberations can be made. ACS suggests a review of existing measures for the removal of online content, to minimize duplication of red tape. Those organizations, mentioned in the paper may already have policies and procedures for managing decisions required that would range from simple to complex cases. ACS strongly urges the government to be mindful that Australia does not become a "nanny state", whereby the government or its policies become overprotective or interfering unduly with personal choice.

3.   Options for dealing with cyber-bullying under Commonwealth legislation.

Rather than develop another new legislation, adding to the other related approaches to online issues such privacy, child safety, censorship, and other piecemeal methods, ACS suggests that the government should review existing measures and approaches in dealing with cyber-bullying with a view to developing a more strategic, consolidated and proactive process.

In addition, a more comprehensive approach to cyber-bullying should take account of recommendation from existing reports and credible research, such as "Young People and Technology a Review of Literature" by Adjunct Professor Helen McGrath, as well consideration of existing state-based proactive programs and measures currently being implemented in schools and communities.

Summary

Whilst there are no easy solutions, Associated Christian Schools requests the Australian Government to consider the comments and suggestions expressed in this response. Associated Christian Schools strongly urges the Australian Government to maintain, as a fundamental principle, opportunities for faith-based schools to preserve their diversity, flexibility in delivery of faith, culture and values, and independence, whilst protecting our students with feasible and effective measures.

References

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