



7 March, 2014

The Director  
Cyber Safety Policy and Programs  
Department of Communications

Email: [onlinesafety@communications.gov.au](mailto:onlinesafety@communications.gov.au)

### **Enhancing Online Safety for Children Consultation**

The Australian Communications Consumer Action Network (ACCAN) would like to thank the Department for consulting on this issue of cyber safety. We believe the Government's steps to address the issue of online safety risks, such as cyber-bullying, are laudable. ACCAN acknowledges that there are very real issues faced by, particularly young people, in dealing with cyber-bullying.

As such, ACCAN believes that funds could be directed to further enhancing and improving existing resilience training and e-safety education targeted at young people.

A number of government bodies, including the Department of Communications and the Australian Communications and Media Authority have already produced educational material, as have community organisations such as the National Children's and Youth Law Centre. We support the further development and wider distribution of a combination of generic and specific, culturally appropriate and well-targeted strategies to educate and train communities in how to handle bullying on social media platforms. An example of culturally appropriate material is a series of posters and an educational comic recently produced by ACCAN in conjunction with Indigenous artists, targeted at improving e-safety among young Indigenous people. We are currently distributing this material to the community through events such as the Indigenous Yabun Festival and our outreach work.

Social media is a rapidly evolving landscape with a steady stream of new market entrants, often based overseas. Effective regulation in this sphere is made difficult as an organisation set up for this purpose would have to negotiate jurisdictional issues and a market in flux. While technical methods may be available, such as internet service provider (ISP) based Internet Protocol (IP) blocking, these techniques are heavy handed and in most circumstances not fit for purpose.

Established players, who are easier targets for regulation, have in most cases developed their own harassment policies. This is a common theme in newly developing industries - as businesses develop they establish their own methods for dealing with adverse outcomes. After time these methods may evolve into industry standards. We believe Government and regulators can play a leadership role in encouraging positive behaviour through business targeted education programs and by issuing a best practice guideline.

We acknowledge the importance of take down policies and support initiatives to ensure they are widely adopted by the social media industry. However, we note their limitation in mitigating harm caused by offending material. Unfortunately, take down strategies cannot address the initial hurt caused by the offending post. Also, the realities of the technology mean a post can quickly and easily be reposted elsewhere. For example, the social media platform 'Snapchat' deletes a post shortly after it is received, which means the original post may be gone before any remedial action can be taken. Yet, via the simple process of capturing a screen shot the recipient can easily pass around the post on other social media.

ACCAN recognises there is a need for a continual review of safeguards in this rapidly changing and technologically challenging area to ensure effective policies are in place to address cyber-bullying. We support a continued commitment to creative initiatives that educate both young people and the social media industry to promote a safe online environment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Teresa Corbin', with a stylized flourish at the end.

Teresa Corbin  
ACCAN CEO