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The Director
Cyber Safety Policy & Programs
Department of Communications
GPO Box 2154
CANBERRA ACT 2601

Friday 7th March 2014

‘Enhancing Online Safety for Children’

Dear Director,

Thank you for the opportunity to respond to the Department of Communication’s discussion paper focusing on ‘Enhancing Online Safety for Children’.

McAfee believes that the Internet and the proliferation of social media bring many benefits. However, we also recognise that with greater numbers of Australians, and particularly young people, going online, a series of risks have emerged that need to be managed in partnership between users, government and industry. We fundamentally believe in a free internet, but are committed to the ideal that as users of the internet we share both a set of rights and responsibilities. Australia needs to develop education and sound technologies that will help develop the full potential of the internet for all legitimate users including children and their parents.

McAfee commends the Federal Government for placing such a high priority on online safety and we stand ready to assist the government in developing a roadmap to deliver real cyber safety for all Australians. We have already made our local and international research on tween, teen and seniors online behaviour, cyber bullying and security risks available to the government and broader community, and will continue to share the insights from this work with all relevant stakeholders. McAfee will continue to contribute to the development of effective strategies and tools that keep Australian kids safe online, including education, security technology and industry partnerships.

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Introduction



We recognise the complexities, benefits and risks of the cyber world, and believe that education is the first line of defense. The focus of the future is on educating children about cyber safety so they are equipped with the knowledge and the tools they need to manage the online influences, both positive and negative. We also see that online risks are growing every day. With the rise of BYOD (bring-your-own-device) in schools and an increase in device usage amongst children, we feel that now is the time to continue the role of education amongst children. The risks we uncovered from the 2013 Tweens, Teens and Technology Report included:

- Children as young as eight are adopting technology faster than expected, particularly social networking, with 67 per cent revealing they are currently using a social media site.
- 67 per cent of tweens are using Skype, Facebook, Club Penguin and Instagram.
- Tweens are also more advanced in their device usage with between 3 and 4 internet enabled devices being used by tweens.
- Of those tweens using devices, two-thirds are on mobiles and tablets for approximately 1.5 hours per day and 42 per cent are using this time to chat with friends.
- Despite the age eligibility for Facebook being 13 years old, 1 in 4 tweens are on Facebook.
- 95 per cent of tweens' parents gave permission for them to be on Facebook.

The Role of Education to Influence Online Behaviour

McAfee continues to believe that the best way to promote real cyber safety for all Australians, and particularly children, is via education. Moreover, this education needs to target children at an early age to ensure they have the skills to deal with the online world.

We know from experience that the use of social media starts in the tween years with 67% of 8-12 year olds using a social media website. Despite the age eligibility for Facebook being 13, more than one in four of the 8-12 year olds are currently using Facebook. In most instances, this use is approved by parents, and almost half of the tween users were assisted by their parents setting up their account.

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According to McAfee's research, cyber bullying is an issue for tweens with around 25% of the 8-12 year olds having seen a nasty comment online. Most parents of tweens are aware of this with 71% of tweens who encountered online bullying of themselves or another informed their parents of the event. However, while tweens are good at keeping parents informed, this generally dries up in teenage years with only 38% of teens who encountered cyber bullying informing their parents.

This raises two key concerns:

1. It is imperative for users of any age to be able to lodge complaints with or without the support or consent of a parent or guardian.
2. We need to focus on educating children from an early age to ensure they are ready for the challenges of the online world, as soon as they join it.

For many years, McAfee has been engaged in cyber education in Australia and around the world as part of our approach to end-to-end safety and security in the online world. We have been a strong supporter of cyber safety from the start of the debate in Australia. McAfee and long-term partner, Life Education, have taken an active role over the past twelve months in supporting teachers and schools in providing relevant content on the real risks students face today in the online world. The focus of the partnership has been the development of two cyber safety modules: bCyberwise and It's Your Call which educate middle and upper primary school students about how to build positive relationships both online and offline, adopting safe and respectful behaviour and strategies to deal with face-to-face and online bullying. In 2013, the McAfee and Life Education partnership educated **118,000** students nation-wide on cyber safety, with the objective of reaching up to 250,000 by the end of 2014.

e-Safety Commissioner for Children

McAfee believes in an end to end approach to cyber security and cyber safety that brings together all stakeholders to develop a robust safety posture. Australian children, parents, industry and the government all have a role to play keeping the online world safe for all legitimate users. McAfee believes the creation of a leading advocate for cyber safety would facilitate the creation of a real national debate on how to develop cyber safety in Australia.

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The appointment of an e-Safety Commissioner for Children should encourage creativity and innovation from industry, community and the government in developing cyber safety strategies.

McAfee is working hand-in-hand with government, police, educators and parents to address cyber education. Our partnership with Life Education to develop the cyber education program harnesses collaboration from industry partners such as Telstra, the Alannah and Madeline Foundation, Department of Communications and ACMA. It is critical that government and industry continue to work together with parents and educators to teach kids about cyber safety from a young age.

The policies the government adopts need to harness industry and community efforts and empower all stakeholders to continue to develop effective strategies to tackle cyber bullying, rather than stifle innovation.

We support the creation of an e-Safety Commissioner to focus public discussion around the need for improved safety for Australians online, especially at risk children. We see great value in establishing a Children's e-Safety Commissioner to take a national leadership role in online safety for children, either as part of a government authority (such as the Australian Communications and Media Authority [ACMA]) or as a non-government organisation. This office would need to be guided by appropriate checks and balances. We believe however, that we need a more robust public discussion around the exact powers of the e-Safety Commissioner and particularly about how this would relate to other allied agencies in government, law and justice sector and industry.

As part of our overall approach to ensuring that Australia has the most robust cyber security and cyber safety posture across the full spectrum, we believe that the e-Safety Commissioner for Children would be ideally placed to gather government, industry sentiments around cyber safety and foster a national debate about how best to achieve this.

Whether as responsibilities of the e-Safety Commissioner for Children or of other relevant agencies we see merit in:

- Harmonising existing cyber safety programs via organisations like the Consultative Working Group (CWG)
- In consultation with industry, improving safety options on smartphones, other devices and internet access services.

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- Working in partnership with government and industry to develop tools and technology that really work. This could include helping develop software which parents can choose to install to help protect children from inappropriate content.
- Developing and sharing advice on guidelines for parents about appropriateness of individual media items for children via centralized information portals for all internet users (parents and children).
- Improving funding for schools to secure access to best practice online safety programs provided by industry and community sector experts.
- Securing focused and appropriate government funding to support Australian based research and information campaigns on online safety.
- Supporting industry calls to develop a voluntary code of conduct to promote best practice on cyber safety.

The Role of Social Media

The definition of a large social media site should be sufficiently forward-looking and flexible to encompass future developments in the social media space. McAfee suggests that the scheme build on voluntary industry codes of conduct which encourage a partnership between public and private stakeholders to deliver better cyber safety outcomes.

The concept of social media is constantly evolving and with the user's habits ever-changing, McAfee's reservation is that a scheme with a too narrow definition of social media might render the scheme obsolete relatively quickly. Platforms with features similar to that of a social networking site, such as online games with chat functions, might not fit the definition outlined in the discussion paper. Also the definition of social media sites should be sufficiently flexible to allow for the innovations of tomorrow in social media to be included.

An example of the ever-changing nature of social networking is the uptake of social media sites on mobile devices such as Smartphone's and tablets. This development in online behaviour should be reflected in the definition that should specify that it includes apps on mobile devices.

McAfee believes that the definition of a 'social networking site' as outlined in the discussion paper would exclude sites such as Skype. McAfee's research from 2013 showed that the most popular social networking site for kids between 8 and 12 is Skype with 28% using the site.

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Further, it is evident from McAfee's research that sites such as Instagram, Snapchat and Tumblr are becoming increasingly popular amongst young people. Risky online behaviour on these sites are common e.g. 21% of 8-12 year old Instagram users do not know all the people they are friends with. Sites like these are not covered by the definition of social media sites proposed in the discussion paper and McAfee is convinced that should be the case.

Online games often include social networking functions such as chat functions and are particularly popular with tweens. McAfee's own research shows that kids are very familiar with chatting - a quarter of 11 to 12 year olds have chatted to someone online they did not know previously.

Given these challenges, we believe the most effective and immediate need is for government to encourage preventive strategies that empower users to make informed decisions about their activities online.

Please feel free to contact me with any queries via my mobile 0435 655 900 or email keith_buckley@mcafee.com.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Keith Buckley".

Keith Buckley
Managing Director, Australia & New Zealand
McAfee