Public submission to consultation process on the draft Online Safety Charter

ReachOut Australia
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The need for safety standards

Technology has opened up a new world of opportunities. Almost every Australian now accesses technology; however, limited regulation and a lack of initiatives to encourage the design and adoption of safety tools is contributing to significant levels of risk and harm.

ReachOut has conducted research to better understand the risks and harm of online bullying, which has shown:

- one in three young people who were bullied said it happened online
- that parents are more worried about social media and technology use than drugs, alcohol and smoking
- that up to 380,000 young people were bullied online in Australia last year, and that of those up to 162,000 young people turned to their parents for help; up to 64,000 sought help from a mental health professional; and up to 49,000 turned to their GP.

ReachOut has stated publicly that technology firms need to be part of the solution in making our online world safer, and called for the development of safety standards.

Draft Online Safety Charter

The current draft Online Safety Charter is a positive step in outlining to the Australian community the expectations of technology firms to protect their safety, with a focus on children and young people.

ReachOut suggests that the charter could be improved by:

Overall

- Involving technology firms, parents, young people and other users in the co-design of the Charter to ensure it meets expectations and needs.
- Where possible, use best practice case studies that help to clarify and explain the Charter expectations and standards for technology firms and users.
- Include a glossary that provides an explanation of specific terms, for example, children, adult, SbD.

Content moderation

- Include clearer guidance or best practice case studies for reasonable timeframes for a response by technology firms.
- Include clearer guidance or best practice case studies for content moderation, including resourcing and by proportion of content.
- Suggest deleting the phrase 'where appropriate' in relation to the immediate removal of illegal, harmful or inappropriate content towards a child or young person.

Content removal

- For problematic websites (see section: 'Problematic websites' below) that this section include an expectation that search engine providers take appropriate action, within a reasonable timeframe, including:
  - deprioritised the website in search engine results
  - make it difficult to find
  - and where particularly harmful, seek to remove the website.

User behaviour

- Additional dot point: Behaviour standards should be communicated to users regularly, and use plain language, and simple and engaging formats.

- Co-design should explore how users would like safety features to be integrated into product design so companies are responding not just to the provision of safety features, but also to ideas that will make it easier for users to adopt such features.

User support
- Include an expectation that where possible online safety resources, including mental health and other support services, be specific to Australia.

Account control
- Suggest that further consultation is required regarding parental or guardian consent for users under 16 years, and particularly to consider any barriers this may present.

Accountability and transparency
- Include an expectation to make public and accessible, information on which technology firms are meeting reporting requirements under the Charter and their compliance with the Charter.
- Ensure that this information is made available in a format that is easy for users to understand. Consideration could be given to a star rating system for technology firms or specific products, similar to cars.

Problematic websites

In January 2019, a number of Australian mental health organisations were contacted by a family bereaved by the suicide of a family member. The family was seeking assistance to remove a website from search engine results and that provides specific information about how to complete a suicide. This website was accessed by the deceased family member and may have contributed to their death.

ReachOut, along with our mental health sector colleagues, is of the view that where explicit online content is identified pertaining to method, means or location and that may result in acts of self-harm, suicide attempt or death, there is an expectation for search engine providers, within a reasonable timeframe, to:
- deprioritised the website in search engine results
- make it difficult to find
- and where particularly harmful, seek to remove the website.

In relation to the specific instance cited, multiple organisations and agencies made representations seeking the removal of the website from search engine results, without success.

The expectations of the Online Safety Charter should require a search engine provider to appropriately deal with problematic websites within a reasonable timeframe, and particularly where the website targets vulnerable people, including young people and those at risk of suicide.

About ReachOut

ReachOut is Australia's leading online mental health organisation for young people and their parents. Our practical support, tools and tips help young people get through anything from everyday issues to tough times – and the information we offer parents makes it easier for them to help their teenagers. We've been changing the way people access help since we launched the world's first online mental health service more than 20 years ago.

ReachOut is accessed by 132,500 people in Australia every month; or more than 1.59 million people each year.

ReachOut co-designs programs and products with young people, ensuring that the evidence-based digital tools, and information and support a young person accesses on ReachOut are relevant and delivered in a way that makes sense to them.

Our core service is ReachOut.com and provides information and relief of symptoms to young people experiencing stress and distress. In addition we have developed a range of innovative programs and tools that extend our reach and impact, including:

- **ReachOut (peer support) Forums:** established in 2007 it is one of the most active and best established online youth mental health forums in Australia and globally. ReachOut Forums offers peer support by both formally trained peer moderators and informally between members.
- **ReachOut Next Step:** a tool that recommends customised support options based on a young person's symptoms and how significantly the symptoms are affecting them. Support options include articles, apps, forums, and online, face-to-face or phone counselling. Referral issues include mental health, alcohol, drugs, bullying and much more.
- **Apps and Tools:** a digital tool that recommends mental health and wellbeing apps and digital resources that have been endorsed by both professionals and young people. It includes three apps that have been developed by ReachOut: Recharge (managing sleep), WorryTime (managing worry/anxiety) and Breathe (managing stress and anxiety).
- **ReachOut Parents:** provides information, tools and resources to help parents and carers support 12 - 18 year-olds in their family environment; and includes an added option of coaching to give parents concerned about their relationship with their teenager additional one-on-one online support.
- **ReachOut Schools:** offers support to teachers and other education professionals to build young people's wellbeing and resilience.

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