

I am extending my support to the submission made by Digital Rights Watch.

The additional expectations outlined in the *Draft Online Safety (Basic Online Safety Expectations) Determination 2021* may perversely affect safety of online users and protection of personal details.

In particular, I am concerned with “Additional Expectation – Provider will take reasonable steps regarding anonymous accounts”. I have fears that this will place an undue monitoring burden on platforms such as Twitter, and as such, a blanket ban approach to anonymous accounts or pseudonyms will come into effect. I use pseudonyms on various platforms to prevent being stalked and harassed by a former intimate partner. I also use pseudonyms to ensure there is a demarcation between my professional online presence and personal online presence. Without anonymity, my personal safety and right to freedom of expression as a regular citizen will be jeopardised.

I am uncertain how “Additional Expectation – Provider will take reasonable steps regarding encrypted services” will actually play out. What are “reasonable steps”? How will material be “detected” in end-to-end encryption services? What oversight will there be to ensure abuse of powers to intercept encrypted data will not occur? What would the penalties be for misuse of power? What would the compensation be to unduly affected users?

Additionally, the lack of safeguards around protecting the ability to share content which would otherwise be considered disturbing/graphic in the pursuit of exposing human rights abuses is deeply unsettling. The ability to share images of police brutality at protests, animal welfare abuses, and other public interest content is a cornerstone of advancing social justice in the modern digital age. Safeguards must be included in the BOSE to prevent “Core Expectation – Provider will take reasonable steps to minimise provision of certain material” being wielded in a fascist fashion.

Finally, a lot of these ‘principles’ for increasing online safety appear to be a dog-whistle for solidifying anti-sex work, anti-LGBT, anti-black, and anti-disabled folk spaces online. There are known studies and examples of how automated content moderating and AI perpetuates racism, misogyny, ableism, and homophobia (refer submission(s) by Digital Rights Watch).