

Feb 16th, 2023

Department of Infrastructure, Transport, Regional
Development, Communication and the Arts
GPO Box 594
CANBERRA
ACT 2601

Submission re the Online Safety (Basic Online Safety Expectations) Amendment Determination 2023

Thank you for the opportunity for the Australian Child Rights Taskforce (the ‘Taskforce’) to make a submission to this consultation process regarding the *Basic Online Safety Determinations* (BOSE), within Australia’s online safety framework. The Taskforce is a coalition of over one hundred organisations, networks and individuals committed to the protection of the rights of children and young people in Australia.¹

The Taskforce warmly welcomes child rights-respecting improvements to BOSE, including:

- The introduction of the ‘best interests of the child’ principle;
- Proposals to enhance protections for children through increased coverage of different systems, including recommender systems, generative AI and proposals to enhance user controls. We note the latter includes default privacy and safety settings for children specifically, including those aged 16 and 17, as per the *Online Safety Act*’s definition of a child, which the Taskforce has been advocating for extensively.²

One of the key roles of the Taskforce is to monitor and report on the implementation of the *United Nations Convention on the Rights of the Child* (‘the Convention’). When Australia ratified the Convention in 1990, this was a commitment that every child in Australia should enjoy the rights set out in the Convention. This includes monitoring and providing advice around children’s right to safety and protection, and now includes their rights in relation to the digital world.

The Convention ensures children the right to protection from harm, and obliges State parties to “protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.”³ This includes ensuring safety and protection in the online world. The UN General Comment 25 on *Children’s Rights in Relation to the Digital World* asserted that “children should be protected from all forms of exploitation prejudicial to any aspects of their welfare in relation to the digital environment. Exploitation may occur in many forms, such as economic exploitation, including child labour, sexual exploitation and abuse, the sale, trafficking and abduction of children and the recruitment of children to

¹For more information about the Taskforce, please see <http://www.childrights.org.au/welcome>

²Australian Child Rights Taskforce 2023 *Submission to the revised Online Safety Codes consultaon*
<https://onlinesafety.org.au/wp-content/uploads/wpforms/31-9e10405917e4c106e4ec5e69a7bc86/ACRT-submission-to-the-Revised-Online-Safety-Codes-March-2023-aa7fb069cf093dc4ef7ad245ec3423aa.pdf>

³Article 19.1, UN General Assembly 1989 *Convention on the Rights of the Child*
<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

participate in criminal activities, including forms of cybercrime. By creating and sharing content, children may be economic actors in the digital environment, which may result in their exploitation.”⁴

Within this framework, the *Basic Online Safety Expectations* form an emerging part of creating a proactive safety regime online for children and young people, and sit alongside other important regulatory agendas that the Taskforce has been active in shaping. This includes:

- Proposals around Australia’s *Privacy Act* reforms;⁵
- Proposals around the development of Online Safety Codes for Class 1A & 1B Material,⁶ and;
- Online safety Industry Standards for Class 1A & 1B Material for Designated Internet Services and Relevant Electronic Services.⁷

We note that there are also future policy developments and consultations proposed regarding the *Online Safety Act* and Australia’s AI framework which will also affect children’s rights, and we welcome the opportunity to engage in the consultation process regarding their development and to support children and young people’s participation in these processes.

The focus of our submission is to outline how the process of developing, and the contents, of the *Basic Online Safety Expectations* could be enhanced to advance children’s rights and realise Australia’s obligations under the Convention. Sections 1 and 2 of this submission lay out a response to the consultation from a child rights framing, and make further suggestions about how the BOSE could advance children’s rights. This submission represents the views of the Taskforce and the signatories as laid out in Section 3.

In summary, the Taskforce recommends that:

- The Department consult widely with children and young people as the BOSE is developed and implemented;
- Aligning the BOSE requirements with the the *National Child Safe Standards* and the *National Strategy to Prevent and Respond to Child Sexual Abuse*;
- The BOSE make clear that protections for children, for example high-privacy-by-default protections and geolocation data protections are afforded to all under 18 year olds, rather than limiting these protections to under 16 year olds;
- Including an additional requirement in section 6(2A) that ‘best interests assessments’ are to be undertaken and published as an enhanced transparency measure, or include this as a requirement for annual transparency reports in subsection 18(A);
- Include additional expectations around systems that have been shown to affect children’s safety online, in subsection 8;
- Improving proposed requirements regarding recommender systems in subsection 8B. Specifically:
 - That friend recommender as well as content recommender systems be covered by safety requirements;

⁴UN Committee on the Rights of the Child (2021) *General comment No. 25 (2021) on children’s rights in relation to the digital environment*.

<https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>, article 112

⁵Australian Child Rights Taskforce 2023 *Privacy Act Review Report*

https://consultations.ag.gov.au/integrity/privacy-act-review-report/consultation/view_respondent?sort=excerpt&order=ascending&uuld=300653688

⁶Australian Child Rights Taskforce 2023 *Submission to the revised Online Safety Codes consultaon*

<https://onlinesafety.org.au/wp-content/uploads/wpforms/31-9e10405917e4c106e4ec5e69a7bc86/ACRT-submission-to-the-Revised-Online-Safety-Codes-March-2023-aa7fb069cf093dc4ef7ad245ec3423aa.pdf>

⁷Australian Child Rights Taskforce 2023 *Industry Standards for Class 1A & 1B Material for Designated Internet Services and Relevant Electronic Services* (available on request) <https://childrightstaskforce.org.au/wp-content/uploads/2024/02/OS-Standards-eSafety-Dec-2023.pdf>

- That an additional example of a reasonable step be included to allow child users to turn off recommender systems;
- That the proposals to require complaint mechanisms as a reasonable step be amended to require that these complaint mechanisms be child friendly and age appropriate for child-users;
- An additional example of a reasonable step is included in subsection 8A, regarding the ‘retraining generative artificial intelligence that has been trained on illegal material’;
- Improving requirements around age assurance in subsection 12(2). Specifically:
 - Existing proposals for codes regarding class 2 materials be replaced with proposals for Industry Standards drafted by the Office of the eSafety Commissioner in the first instance;
 - Some sort of trial or pilot of age assurance technology be supported by regulators;
 - Requiring platforms to produce periodic transparency reports regarding the development and implementation of, and accuracy of, age assurance mechanisms in place on their platform, potentially as part of transparency reporting under subsection 18(A);
- Enhancing transparency and accountability overall. Specifically:
 - Data provided to meet requirements regarding transparency needs under subsection 18(A) to be subject to independent oversight and review;
 - Changes to the *Online Safety Act* to ensure the BOSE are enforceable. We appreciate this is beyond the scope of this consultation, and that it has been included in the Terms of Reference for the upcoming *Online Safety Act* review.

Section I. The process of developing the BOSE

We note that the development of *Basic Online Safety Expectations* is an opportunity to advance children and young people’s right to participate. The *UN Convention on the Rights of the Child* affords children the right to participate in decision making processes that affect them, which includes decisions made about the governance of the digital world.⁸ As the *General Comment No. 25 (2021) on Children’s Rights in Relation to the Digital Environment* makes clear, “when developing legislation, policies, programmes, services and training on children’s rights in relation to the digital environment, States parties should involve all children, listen to their needs and give due weight to their views.”⁹

We are unclear about the extent to which young people have engaged in the development of the BOSE, and would encourage the Department to consult widely with children and young people as they are further developed and implemented. We note that Reset.Tech Australia’s submission¹⁰ includes data from a survey of 1,000 young people, which highlights the insights and capacities of young people to engage in these discussions. The taskforce, and our members, would be delighted to support the Department in undertaking these consultations if this would be helpful.

Section II. Improving proposals within the BOSE

Aligning the BOSE proposals with broader policy frameworks that affect children’s rights

The UN General Comment 25 on *Children’s Rights in Relation to the Digital World* asserts that “children’s online protection should be integrated within national child protection policies”.¹¹ There are a range of existing safety and protection agendas that should be considered in revising the BOSE, including the *National Child Safe Standards* and the *National Strategy to Prevent and Respond to Child Sexual Abuse*. This would ensure policy coherence, promote actions that are compatible with the range of rights respecting Australian legislation and result in better protections for children in Australia.

We note that there are tensions between the current *Basic Online Safety Standards*—that would also be carried over into the proposed BOSE—and the Online Safety Codes and Industry Standards for Class 1A & 1B Material which were paradoxically produced to meet industry’s requirements under the BOSE. Specifically, the Codes and Standards require that privacy-by-default settings be turned on only for ‘younger Australian children’ aged under 16. The BOSE however states that “if a service or a component of a service (such as an online app or game) is targeted at, or being used by, children ... ensuring that the default privacy and safety settings of the children’s service are robust and set to the most restrictive level,”¹² and presumably rests on the *Online Safety Act’s* definition of a child which is “an individual who has not reached 18 years”. There is no definition of ‘younger Australian child’ in the *Online Safety Act* nor BOSE that warrants reduced protections for 16 & 17 year olds.

Allowing public settings by default or location broadcasting for 16 & 17 year olds does not appear to be compliant with the BOSE.¹³ We would appreciate clarification about how these two policy initiatives (the BOSE themselves and the Codes instigated by the BOSE) interact, and which standard online services can be held to. In this

⁸Article 12, UN General Assembly (1989) *Convention on the Rights of the Child*, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

⁹UN Committee on the Rights of the Child (2021) *General comment No. 25 (2021) on children’s rights in relation to the digital environment*. <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

¹⁰Reset.Tech Australia 2024 *Submission to the Online Safety (Basic Online Safety Expectations) Amendment Determination 2023* <https://au.reset.tech/news>

¹¹UN Committee on the Rights of the Child (2021) *General comment No. 25 (2021) on children’s rights in relation to the digital environment*.

<https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>, article 25

¹²*Online Safety (Basic Online Safety Expectations) Determination 2022* Subsection 6(C)(3)

¹³*Online Safety Act 2021* Sec 5

clarification, we note that the Committee on the Rights of the Child described the Best Interests principle as a fundamental, interpretive legal principle, meaning that if a legal decision is open to interpretation, the interpretation that is in children’s best interests should be chosen.¹⁴ Given the importance of privacy settings for online safety,¹⁵ it is clearly in children’s best interests for the Codes and Standards to stipulate default settings to be set to the highest level for all children up until the age of 18, as the BOSE intended.

Improving the BOSE proposals from a child rights perspective

We warmly welcome the proposals for the introduction of an expectation services will take reasonable steps to ensure that the best interests of the child are a primary consideration in the design and operation of any service that is used by, or accessible to, children (subsection 6(2)A). The best interests principle is a fundamental principle within a child rights framework, and we believe its introduction will encourage the creation of a rights-respecting digital world for children. The Committee on the Rights of the Child outlines how crucial the best interests principle can be in advancing children’s rights in a digital environment, stating that:

“The best interests of the child is a dynamic concept that requires an assessment appropriate to the specific context. The digital environment was not originally designed for children, yet it plays a significant role in children’s lives. States parties should ensure that, in all actions regarding the provision, regulation, design, management and use of the digital environment, the best interests of every child is a primary consideration.”¹⁶

Including the best interests principle in Australia’s online safety framework helps to realise Australia’s obligations under the *Convention on the Rights of the Child*.

We also note that this harmonises with proposals in the *Privacy Act Review*, specifically regarding; the introduction of a Children’s Privacy Code; the introduction of the best interests principle as a fundamental requirement for assessing the fairness of data processing, and; assessing the right to target children. The Taskforce has been active in these debates and is happy to share resources or materials regarding these with the Department if it is helpful.¹⁷

While we welcome these broad changes, we believe there are six sensible improvements that can be made to the proposed BOSE which will provide even greater protections for children:

1. *Including an additional requirement that ‘best interests assessments’ are to be undertaken and published as an enhanced transparency measure, as part of subsection 6(2A) or as a requirement for annual transparency reports in subsection 18(A).* This will aid in transparency and ensure that sufficient oversight and scrutiny around considerations of children’s best interests is possible. We note that the UK’s Information Commissioner’s Office—while addressing the best interests principle through a lens of privacy—has provided tools to enable companies to easily produce best interests assessments.¹⁸ The taskforce has been engaged in early thinking about the role and shape of a ‘best interests assessment’ regarding privacy and targeting, but

¹⁴Paragraph 6, Committee on the Rights of the Child 2013 *General comment No. 14 (2013) on the right of the child to have his or her best interests taken as a primary consideration* https://www2.ohchr.org/english/bodies/crc/docs/gc/crc_c_gc_14_eng.pdf

¹⁵For example, at one stage Meta found that 75% of all ‘inappropriate adult-minor contact’—or as it is more commonly called, grooming—on Facebook was a result of their ‘People You May Know’ friend recommender system. As made public in *Alexis Spence et al. v. Meta*, U.S. District Court for the Northern District of California, Case No. 3:22-cv-03294 (filed June 6, 2022) p. 11-12, *Growth, Friending + PYMK, and Downstream Integrity Problems*. <https://pugetstaffing.filevineapp.com/s/9eb2BZcUfhdTxxIfV45CJnIivYHhdWcRRuQVwSMz120RVs7ATmxn9r5>

¹⁶Committee on the Rights of the Child 2021 *General comment No. 25 (2021) on children’s rights in relation to the digital environment*.

<https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>, para 12&13

¹⁷See for example, Reset.Tech Australia, Australian Child Rights Taskforce, Alannah & Madeline Foundation & Child Fund Australia 2024 *Best Interests and Targeting: Implementing the Privacy Act Review to advance children’s rights*

<https://au.reset.tech/news/best-interests-and-targeting-implementing-the-privacy-act-review-to-advance-children-s-rights/> and Reset.Tech Australia 2023

Prohibiting targeting to children and children’s best interests: Can the two coexist?

<https://au.reset.tech/news/briefing-prohibiting-targeting-to-children-and-children-s-best-interests-can-the-two-coexist/>

¹⁸Information Commissioners Office (UK) 2023 *Best interests of the child self-assessment*

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/best-interests-self-assessment/>

this approach could be easily expanded out to cover best interests assessments of safety.¹⁹ Requiring these assessments, and for them to be publicly released, would both enhance transparency and ensure children’s best interests were meaningfully regarded as primary consideration.

2. *Including expectations around additional ‘systems’ that have been shown to affect children’s safety online, in subsection 8.* While it is a welcome step to include safety expectations around generative AI and recommender systems, many other systems are involved in creating risks to children. These include, but are not limited to:

- a. Content moderation systems. Content moderation systems can be a strong protective factor for children and young people that see harmful content removed more quickly. However too often they often fail and leave harmful content online available to children and young people.²⁰ Currently content moderation systems are not addressed in the proposals.
- b. Advertising systems. Ad approval systems can allow or prevent the spread of harmful content in paid for ads, but approve risky content to be run in paid-for advertising that can reach children.²¹ Likewise, ad management systems often see children targeted in risky ways that creates and exacerbates vulnerabilities.²² Despite the risks they create, advertising systems are not addressed in the proposals.

We note that European and British regulations—the *Digital Services Act* and UK *Online Safety Act* respectively—place proactive obligations on service providers to take reasonable steps regarding all systems and elements involved in the operation of their service, with certain systems named for clarity. This broader approach of placing requirements on all systems could help to future proof the BOSE as new systems and platforms emerge, and help to harmonise Australian regulation with emerging global norms.

3. *Improving requirements regarding recommender systems in subsection 8B.* Recommender systems can be powerful drivers of risks for children, and to reduce these risks three amendments could be made to the proposals:

- a. The inclusion of requirements that friend recommenders systems, and all recommenders systems, be covered within the BOSE (in addition to content recommender systems);
- b. That child users be given the ability to turn off recommender systems as an example of a reasonable steps;
- c. Further specification regarding the proposed reasonable steps that services ‘establish mechanisms (or amend existing mechanisms) so that end-users can make complaints or raise queries’. We recommend including requirements that these mechanisms be child friendly and age appropriate to ensure utility and functionality for children, in order for them to exercise their rights and enact self-protective behaviours regarding unlawful or harmful material and activity. Complaints from children often present differently. Recent guidance from UNICEF demonstrates that ‘For children and young people, the complaint is likely to be less formal, may not be in writing, and can even be implicit or hidden behind a question or a seemingly general reflection’.²³ The importance of appropriate complaint handling and response has been further emphasised in the Royal Commission into Institutional Responses to Child Sexual Abuse, which found

¹⁹See for example, Reset.Tech Australia, Australian Child Rights Taskforce, Alannah & Madeline Foundation & Child Fund Australia 2024 *Best Interests and Targeting: Implementing the Privacy Act Review to advance children's rights* <https://au.reset.tech/news/best-interests-and-targeting-implementing-the-privacy-act-review-to-advance-children-s-rights/> and Reset.Tech Australia 2023 *Prohibiting targeting to children and children's best interests: Can the two coexist?* <https://au.reset.tech/news/briefing-prohibiting-targeting-to-children-and-children-s-best-interests-can-the-two-coexist/>

²⁰See for example, Reset.Tech EU *Risks to Minors* research series, that highlights failures of content moderation systems on Instagram, X and TikTok when it comes to self-harm, suicide and eating disorder materials. <https://www.reset.tech/resources/risktominors/>

²¹Tech Transparency Project 2021 Facebook’s Repeat Fail on Harmful Teen Ads <https://www.techtransparencyproject.org/articles/facebooks-repeat-fail-harmful-teen-ads>

²²Reset.Tech Australia 2021 *Profiling Children for Advertising: Facebook’s Monetisation of Young People’s Personal Data* <https://au.reset.tech/news/profiling-children-for-advertising-facebooks-monetisation-of-young-peoples-personal-data/>

²³Unicef 2019 *Child Friendly Complaint Mechanisms* https://www.unicef.org/eca/sites/unicef.org.eca/files/2019-02/NHRI_ComplaintMechanisms.pdf

child-friendly complaint mechanisms are an essential standard of a child safe institution. The Commission also found that a child focussed approach to complaints are essential to achieving the best interests of the child, a key part of proposed changes to BOSE.

4. *Improving requirements around Generative AI.* We recommend an additional example of a reasonable step be included in section 8A, regarding the ‘retraining generative artificial intelligence that has been trained on illegal material’. Currently, many AI training models include CSAM in their training models²⁴ and are subsequently able to generate synthetic CSAM. This is an abhorrent violation of children’s rights. While we appreciate that retraining AI models fundamentally requires them to be ‘reset’, CSAM cannot be trained out of a model once it has been included. Given the abhorrence of the violation, it must be considered reasonable to reset models that are found to have been trained on CSAM. We note that there is global precedent for requiring models and algorithms to be reset,²⁵ including those that have violated children’s rights.²⁶
5. *Improving requirements around age assurance in subsection 12(2).* We support in principle the proposals to introduce requirements for platforms to take reasonable steps to prevent children accessing class 2 materials, and the introduction of appropriate age assurance mechanisms as part of this. We note that these proposals already imply proportionality and balance, and a range of children’s rights need to be considered in their implementation, including respecting their rights to access digital technologies more broadly as well as children’s right to privacy. Age assurance mechanisms must themselves function in children’s best interests. To complement and improve the proposals regarding age assurance for class 2 materials in the BOSE:
 - a. Earlier proposals from the Office of the eSafety Commissioner to encourage pilots of appropriate age assurance mechanisms could have provided a potential route forward within the current limitations of the technology.²⁷ While we understand that these proposals were not taken forward at the time, advancing age assurance mechanisms necessitates experimentation and trials, and regulator engagement in this process would help to ensure community trust in the process. We recommend that some sort of trial or pilot be supported.
 - b. We do not believe that the current approach—which leaves the development of age assurance mechanisms to voluntary codes for class 2 material to be drafted by industry—will produce a satisfactory outcome. As the experience of the online safety codes for class 1A& 1B material highlighted, this process does not adequately advance children’s rights in the process nor outcome.²⁸ Where the proposals in BOSE continue to rely on industry drafted codes, they represent a missed opportunity to advance children’s rights. We recommend that the proposals for codes regarding class 2 materials be replaced with proposals for Industry Standards drafted by the Office of the eSafety Commissioner in the first instance.
 - c. The proposals in the BOSE could be strengthened by requiring platforms to produce periodic transparency reports regarding the development and implementation of, and accuracy of, age assurance mechanisms in place on their platform. These could be a compulsory section in the annual transparency reports required by companies under subsection 18(A). The data and information provided in these should be subject to independent review.

²⁴Davey Alba & Rachel Metz 2023 ‘Large AI Dataset Has Over 1,000 Child Abuse Images, Researchers Find’ *Bloomberg*
<https://www.bloomberg.com/news/articles/2023-12-20/large-ai-dataset-has-over-1-000-child-abuse-images-researchers-find?leadSource=uverify%20wall>

²⁵Kelley Slaughter 2021 *Algorithms and Economic Justice: A Taxonomy of Harms and a Path Forward for the Federal Trade Commission*
https://yjolt.org/sites/default/files/23_yale_j.l._tech._special_issue_1.pdf

²⁶FTC 2022 *FTC Takes Action Against Company Formerly Known as Weight Watchers for Illegally Collecting Kids’ Sensitive Health Data*
<http://www.ftc.gov/news-events/news/press-releases/2022/03/ftc-takes-action-against-company-formerly-known-weight-watchers-illegally-collecting-kids-sensitive>

²⁷Office of the eSafety Commissioner 2023 *Roadmap to Age Verification*
<https://www.esafety.gov.au/about-us/consultation-cooperation/age-verification#roadmap-and-background-report>

²⁸See for example ACRT 2023 *Letter to eSafety Commissioner*
https://childrightstaskforce.org.au/wp-content/uploads/2023/01/Online-Safety-Codes_-_ACRT-letter-to-eSafety.pdf and Reset.Tech 2022 *How outdated approaches to regulation harm children*
<https://au.reset.tech/news/how-outdated-approaches-to-regulation-harm-children-and-young-people-and-why-australia-urgently-needs-to-pivot/>

It is worth reiterating that proposals to introduce requirements for online services to regard children's best interests as a primary consideration, and other additional protections for children, need not and should not be conflated with requirements around improved age assurance to prevent access to class 2 materials. Put simply, age assurance requirements to prevent access to class 2 materials are not the same as age assurance requirements to 'turn on' safety features. Where age assurance is proportional, existing technologies produce age estimates more than adequate enough for the purposes of 'turning on' safety features.

6. *Enhancing transparency and accountability overall.* The proposed moves towards greater transparency are welcome, but need to be enhanced and matched with powers for accountability to more effectively advance children's rights. Specifically:
 - a. All data provided to meet requirements regarding transparency needs under subsection 18A to be subject to independent oversight and review. We note that many civil society organisations are calling for requirements around researcher access to public interest data, which exist within the EU. These sorts of independent assessments and ability to review information provided by online services are required to ensure transparency measures produce meaningful and comprehensive data that helps to drive up safety standards for children.
 - b. We also note that the BOSE are currently not meaningfully enforceable, which significantly hampers their ability to drive up safety standards for children. While this would require changes to the *Online Safety Act*, effectively advancing children's right to protection online requires the BOSE to become enforceable and for regulators to be enabled, resourced and empowered to hold online services to account for breaches of them. We note that the terms of reference for the review of the *Online Safety Act*²⁹ recommend considering the enforceability of the BOSE as part of its terms of reference, and look forward to engaging with this review.

²⁹DITRDCA 2024 *Terms of Reference – Statutory Review of the Online Safety Act 2021*
<https://www.infrastructure.gov.au/sites/default/files/documents/tor-statutory-review-online-safety-act-2021-8Feb.pdf>

Section III. Collaboration with the Taskforce

The development of the BOSE provides an opportunity to advance children’s rights under the Convention and is welcomed by the Taskforce and signatories to this letter. Some Taskforce members and partners have also submitted their own responses to the Review, offering particular expertise, differing or more specific view points.

These include:

- UNICEF Australia
- The Alannah & Madeline Foundation
- Children and Media Australia
- Reset.Tech Australia
- Centre for the Digital Child

Should the Taskforce, or any of our members and partners, be able to assist the Department, please do not hesitate to contact us.

Regards,

Australian Child Rights Taskforce

To contact the task force, please reach out to James McDougall, Policy advisor 