

## **Submission for Modernising Australia's National Classification Scheme- Stage 2 Reforms.**

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The Following recommendations in this submission is focused on changes to Publications classifications, and the reasons to support them. I am a mother of three young teen daughters. Like many parents and friends and members of our community, I have many concerns around the content and imagery assessable to children and teens in books in our libraries and schools unrestricted. How does a sexually explicit manuscript and up as unrestricted book for children? Also march this year I completed the online training as an Assessor and Classifier for film and games.

### **1) Majority of publications are unrestricted**

Many people assume that all books in libraries, schools and for sale in book stores have been classified by the Australian classification board. That is not true.

Unlike videos and games, publications are not required to be classified unless they meet the definition of a 'Submittable Publication'.

Publications classification categories are; Unrestricted, and legally restricted; Category 1 R18+, Category 2 X18+ and RC (refused classification). Category 1 and 2 publications are required to be wrapped and sealed before they are sold and distributed.

State and Territories are responsible for enforcing the classification scheme. Each state has their own laws around the sales, distribution, display and viewing of Publications, Videos and Games.

### **2) Publications should be classified to the same standards, with consumer advice on the covers, as film and games.**

Parents and or caregivers would be able to make better informed choices when helping their child/children select age-appropriate books if the correct consumer advice were on the covers. And many children are already aware and know different consumer advice and what it means.

More importantly, how many books are there, that have not classified by the Australian Classification board and would meet the requirement of a submittable publication?

### **3) Examples of ratings and consumer advice for videos and games; Still imagery and on-screen text.**

With Film and Games classification the Accredited Classifier or Assessor must include, when determining the impact:

Still Imagery and on-screen texts; pictures, photographs, artwork, printed materials, screenshots, murals, sculpture, posters, and graffiti.

A few examples:

Highly detailed photograph, artwork, printed material, screenshot, of a sexual nature (e.g. close-up genital detail with anatomical accuracy) or highly detailed depictions of characters in a sexualised manner via positioning and costuming would be Rated; R18+ with Consumer advise; High impact sexualised imagery.

Incidental visual depictions (but not of use) of mild drug paraphernalia including papers, hookah, marijuana leaf on a poster would be rated PG, mild drug references.

Breast nudity, Naturalistic, distant perspective if sexualised, may include nipple detail would be rated M.

**If still imagery and texts are classified in videos and game, then why not for books?**

#### 4) **Books vs Video and Games adaptations.**

In many cases when a book or book series has a video and or games adaption, the book version of the story has far more details and scenes than the video or games version. Video or games adaptations of books often have changes in the detail of characters and settings or storylines, or have had different translations into English from foreign languages. These changes are done, presumably, to mitigate the impact so they fall within the Australian classification guidelines for film or games. A couple of examples below:

In the graphic novel series 'The Boys,' one book has a depiction of bestiality act, whereas in the video adaption the bestiality is implied, as well as much of the sexual activity in the series. – Depictions and descriptions of practices of bestiality should be refused classification, regardless of what format it is in.

Many manga books contain more detailed depictions and coarse language text in comparison to their anime video adaptations. For example, in some videos, the blood from injuries may be edited out or edited in different colour (e.g. red to purple), or coarse language would include crude humour or comedic or satirical tone, sexualised nudity would be partially obscured or scenes would have dim lighting or darkness.

The book series '50 Shades of Grey', has far more explicit descriptions than what is depicted in the film version.

#### 5) **Sexually Explicit books targeted to children and teens.**

Some books for teens contain moderate to high descriptions of sexual activity or sexual references and coarse language.

For example, Book titled 'Juliet takes a breath' by Gabby Rivera, has a target audience for grades 7 to 9. Contains coarse language [REDACTED] (in sexual context) and [REDACTED] in relation to various sexual references. Under coarse language, [REDACTED] has a higher impact than [REDACTED] (in sexual context). If [REDACTED] is used in videos and games, in the same context as in this book, it would contribute to a MA15+ when using the matrix template.

Under Film and Games classification guides for Sex, only M to R18+ allow various kinds of implied sexual activity may be depicted. Yet there are many picture books, graphic novels and novels targeted to young children and teens that depict and describe sexual activity, some with instructions.

Detailed descriptions or pictures of sexual fetish or kink is rated MA15+ to R18+. Yet some books targeted to teens have details and depictions on the use of sex toys, bondage, how to do sexting and how to research pornography. Why are authors telling teens how to take nude photos and send them or how to find pornography? Keeping in mind that majority of books have not been classified by the Australian Classification Board and are unrestricted to any age.

#### 6) **Acting CEO's request to remove the sexually explicit imagery in deputation handouts for council meeting.**

On the 12<sup>th</sup> of March this year I did a deputation speech at Port Adelaide and Enfield ordinary council meeting; Sexually explicit books for children in our public libraries.

I spoke on behalf of members of that community. And made a few requests; conditions on how certain books are accessed and displayed, and an audit of our libraries for 'submittable publications.'

The Friday before the deputation I received this email (below) requesting the removal of the sexually explicit images in the handouts as they may cause an 'offence' and elected members need to feel 'safe.'

When members of the adult community find images in books for children offensive, then perhaps they should be legally restricted!

I've been provided with a copy of the handout you wish to provide to Elected Members in support of your deputation at next week's Council meeting.

The material you have provided contains images which are very explicit and there is a risk that they cause offence to people at a public meeting. I appreciate the nature of these images forms part your deputation, however I believe you can describe the nature of the material and your concerns without having to present the images at a public meeting. Should any of our Elected Members wish to view the material they can contact you directly outside of the meeting. It is important Elected Members have a choice in whether they wish view this type of material or not.

I trust you understand my responsibilities in ensuring the Meeting is a safe environment for everyone in attendance and that your handout needs to remove the sexually explicit images in order for it to be distributed at the meeting.

Should you have any questions regarding my request I'm happy to discuss further."

## 7) **Local and State government departments policies use of online content.**

Local and State government departments, policies state that, it is prohibited and unlawful to use online E-resources (including e-books), to gain access to, transmit, publish, and communicate any material that is pornographic, offensive, indecent etc yet a child can pick up and have unrestricted access to sexually explicit, or pornographic books, that have not been classified by the Australian Classification board. Why are librarians and or teacher-librarians adding to their collections sexually explicit or pornographic books, knowing that they are such books?!

### **Acceptable use policy <sup>1</sup>for library customers;**

"You must not use or attempt to use the E-Resources (including either using or attempting to use Libraries' network or allowing or attempting to allow the telecommunications supplier's (Supplier) network to be used) in a manner which is Important Our Philosophy and Objective Notice of Indemnity Terms of Use ACCEPTABLE USE POLICY FOR LIBRARY CUSTOMERS Page 2 of 5 OFFICIAL unlawful or is prohibited by a code of conduct or these Rules. This includes, but is not limited to, the use or attempted use of the E-Resources: 1. to gain access to or to transmit, publish or communicate any material that is pornographic, obscene, defamatory, offensive, objectionable, abusive, indecent, sexist, racist, menacing, or otherwise illegal"

### **Responding to online safety incidents in South Australian schools;**

#### "Illegal and harmful content

Children and young people may be exposed to or seek out inappropriate online content. They may become involved in distributing inappropriate content. Online content includes text, imagery, animations, sound, and video...Examples include... sexually explicit behaviour...pornography"<sup>2</sup>

1

<https://www.bing.com/ck/a?!&p=04b4b36e8c98a9d0JmltdHM9MTcxMzM5ODQwMCZpZ3VpZD0xY2Y1NjNmZi01YmUxLTlyxYWEtM2YwMC03N2I5NWFMtYwOTQmaW5zaWQ9NTE5Nw&ptn=3&ver=2&hsh=3&fclid=1cf563ff-5be1-61aa-3f00-77b95af16094&psq=acceptable+use+policy+for+library+customers&u=a1aHR0cHM6Ly93d3cubGlicmFyaWVzLnNhLmdvdj5hdS9jdXN0b20vd2ViL1BMUy9JbnRlcm5ldF9hY2NlcHRhYmxlX3VzZV9wb2xpY3lfZm9yX2xpYnJhcnlfY3VzdG9tZXJzLnBkZg&ntb=1>

2

<https://www.bing.com/ck/a?!&p=58fca12ec15c91c0JmltdHM9MTcxMzM5ODQwMCZpZ3VpZD0xY2Y1NjNmZi01YmUxLTlyxYWEtM2YwMC03N2I5NWFMtYwOTQmaW5zaWQ9NTE5OA&ptn=3&ver=2&hsh=3&fclid=1cf563>

## 8) Teacher and student resources should be classified.

Parents expect their children to feel safe from content that may harm or disturb them<sup>3</sup>, especially when they are at school.

Some documentaries and news reports (e.g. BTN) shown to students for various worldly subjects may contain some themes that give the students a sense of urgency or threat or menace. E.g. reports on wild fires, floods or earthquakes causing death, injured or homelessness. Or probability of WW3 or nuclear attacks etc.

To ensure that all teacher/student resources have the same standards Australia wide, all teacher and student resources should be classified.

## 9) Publishing companies, a form of ‘Corporate Paedophilia’?

Publishing companies include, traditional, vanity and self-publishing. Many of these publishing companies, in their submission or publishing terms and conditions or policies or guidelines are not supposed to accept or publish, offensive, sexually explicit, or pornographic materials yet there are many books published by these publishing companies that are very sexually explicit or pornographic.

Why are they publishing them? Why aren't they submitting their books for classification review before selling and distributing them?

How much money are they earning from royalty payments from selling sexually explicit books targeted to children? Especially when some of these books have detailed sex instruction with “things to try.”

### A couple of examples of Publishing companies Terms and conditions:

**Penguin Random house’s Terms of Use;** “Your User Submission may not include any negative comments that are connected to race, national origin, gender, sexual orientation or physical handicap or that are defamatory, slanderous, indecent, obscene, pornographic or sexually explicit.”<sup>4</sup>

**Kindle Direct Publishing (KDP) Content Guidelines;** “Offensive content; we don’t sell certain content including content that we determine is hate speech, promotes the abuse or sexual exploitation of children, contains pornography, glorifies rape or paedophilia, advocates terrorism, or other material we deem inappropriate or offensive.”<sup>5</sup>

## 10) Conditions for sexually explicit books.

It is my recommendation that all sexually explicit books should be wrapped and sealed. Under section 13A of the Act, the Board may, if it classifies a publication Unrestricted, impose a condition that it not be sold, displayed for sale, or delivered unless it is contained in a sealed package.

## 11) Protecting children from explicit content.

More needs to be done to protect minors from viewing content online that is unsuitable for them to see or read. Adults should pay if they wish to view porn. All free and unsolicited online pornography should be removed.

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[ff-5be1-61aa-3f00-77b95af16094&psq=responding+to+online+safety+incidents+in+south+australian+schools&u=a1aHR0cHM6Ly93d3cuZWR1Y2F0aW9uLnNhLmdvdi5hdS9wb2xpY2llcy9zaGFyZWQvcnVzZG9uZGluZy10by1vbmxpbmUtc2FmZXR5LWluY2lkZW50cy1pbi1zb3V0aC1hdXN0cmFsaWFuLXNjaG9vbHMtZ3VpZGVsaW5lLnBkZg&ntb=1](https://www.abc.net.au/news/2018-03-22/bestiality-references-allegedly-made-during-presentation-at-renmark-high-school-abc-news/4777777)

<sup>3</sup>[Bestiality references allegedly made during presentation at Renmark High School - ABC News](https://www.abc.net.au/news/2018-03-22/bestiality-references-allegedly-made-during-presentation-at-renmark-high-school-abc-news/4777777)

<sup>4</sup>[Terms of Use | Penguin Random House](https://www.penguinrandomhouse.com/terms-of-use/)

<sup>5</sup>[Content Guidelines \(amazon.com\)](https://www.amazon.com/kdp-content-guidelines/)

**12) Suggested changes to themes.**

Descriptions and depictions on gender transitioning to be included for classification under themes. There are various themes that gender transitioning may fall under, such as; Drugs (proscribed), Medical procedures, Mental health, and Reproductive health, which can be confronting and concerning for readers and viewers.