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Stage 2 Classification Reform – Public Consultation

Thank you for the opportunity to respond to the Public Consultation Paper *Modernising Australia's Classification Scheme – Stage 2 Reforms*.

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What Relationships Australia does

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Relationships Australia is an Australian federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, cultural background, lifestyle choices, or economic circumstances. Relationships Australia provides services for victims and perpetrators of sexual violence, as well as for domestic, family and other interpersonal violence. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others. Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people, in all their diversity, to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. Our services include:
- individual, couples, and family counselling
- family law counselling, mediation and dispute resolution, and post-separation services for parents and children
- Children's Contact Services (services which provide supervised contact and changeovers for high risk families)
- Specialised Family Violence Services
- therapeutic and case management services to applicants for Redress Support Services, Forgotten Australians, Forced Adoption Support Services, Intercountry Adoptee Family Support Service, and Post Adoption Support Services
- services designed for men, including programs to support parenting capacities and resources, Men's Behaviour Change Programs, and tailored programs such as the Respectful Relationships Program for Indigenous clients
- parenting capacity programs
- gambling help services
- alcohol and other drugs services
- employee assistance programs
- Headspace (youth mental health) services
- mental health (including suicide prevention) services and programs
- supporting Australians with disability through our counselling services connected with the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability
- Family Mental Health Support Services, and

- a range of tailored services for older Australians, including senior relationship services, elder mediation, elder abuse case management and mediation, social connection services and mental health services in residential aged care on behalf of Primary Health Networks in South Australia.

This submission:
- highlights aspects of the stage 2 reforms which carry particular risks for the safety of children and young people, particularly in relation to the accessibility of:
  - content that depicts or promotes sexual violence (including self-generated and AI-generated content)
  - gambling (and gambling-like) content,[1] and
- offers suggestions to inform regulatory approaches that are clear, accessible and fit for purpose.

Recommendations

Recommendation 1   That Australian governments engage meaningfully with First Nations and Culturally and Linguistically Diverse people to ensure that the Scheme is accessible and inclusive.

Recommendation 2   That the purposes of the Scheme be expanded to make explicit the additional (existing) purpose of the Scheme of informing the eSafety Commissioner's performance of its function to protect the community from online harms, pursuant to the OS Act.

Recommendation 3   That the Scheme state explicitly that it does not apply to user-generated content, and include a note referring users to the powers of the eSafety Commissioner has in relation to harmful user-generated content.

Recommendation 4   That Government:
- implement opportunities to clarify the scope of 'submittable publication', and
- broaden the definition to include depictions or descriptions that are unsuitable for children under the age of 15 years.

Recommendation 5   That Government establish a Classification Advisory Panel.

Recommendation 6   That, if Government establishes a Classification Advisory Panel, membership should also include people with expertise in:
- child and adolescent mental health
- child safety
- gendered violence
- intimate partner violence, gendered violence, peer sexual abuse among children and young people, and adolescents using violence in the home
- the particular challenges faced by people with disability in engaging with content, including as parents or carers of children and young people, and

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[1] Acknowledging the Government's introduction, with the agreement of State and Territory Governments, of a mandatory minimum classification for computer games containing simulated gambling and paid loot boxes. This responds to well-documented concerns about the effect of monetisation through games of chance: see, eg, King & Delfabbro, 2018; Kristiansen & Severin, 2020; Rockloff et al, 2020.

- associations between exposure to radicalisation and/or grooming content and adverse outcomes.

Recommendation 7   That:
- the Scheme apply classifications across platforms, so that classification of content does not vary according to the platform on which it is delivered (see ALRC Report 118, Recommendation 9-3)
- 'exempt content' be defined, and
- the 'Refused Classification' category be replaced with a 'Prohibited' category (see ALRC Report 118, Recommendations 9-1, 11-1).

Recommendation 8   That the Guidelines be reviewed at least every ten years. The terms of reference for these reviews should also require consideration of contemporary evidence in relation to child development, child safety, children's mental health[2] and the availability and volume of access to high impact content by children.

Recommendation 9   That the existing governance and regulatory arrangements be simplified and clarified by establishing a single national regulator and conferring upon that regulator a unified suite of licensing (where appropriate) and regulatory powers.

Recommendation 10 That the Act confer on the single national regulator the following powers and functions, supported by adequate appropriations:
- undertaking or commissioning research activities (see ALRC, Report 118, Recommendation 9-4)
- notifying Australian or international law enforcement agencies or bodies about content that is, or would be likely to be, Prohibited without having the content first classified (see ALRC, Report 118, Recommendation 12-3), and
- the functions described at Recommendation 14-1 of ALRC Report 118.

Recommendation 11 That Government establish a single reporting and help-seeking mechanism, available through an online portal and through a dedicated 1800 number, to which children, their parents and caregivers can give sufficient information to enable immediate connection with the appropriate agency.

Recommendation 12 That, whether or not sitting within a single national regulator, the ACMA should be sufficiently resourced to regulate content that, while not falling within the scope of the eSafety Commissioner's powers, nevertheless is accessible and harmful to children.

Recommendation 13 That, to the extent that they have not yet been fully implemented, the Government proceed with full implementation of the recommendations made to Government by Relationships Australia in its submission concerning mandatory minimum classifications for gambling-like content in computer games.[3]

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[2] The Australian Child Maltreatment Study demonstrates strong associations between child maltreatment (which includes exposure to intimate partner violence and sexual violence) and mental illness, as well as other adverse health outcomes; see, eg, Scott et al, 2023; Lawrence et al, 2023; Harris et al, 2024.

[3] Available at https://www.relationships.org.au/wp-content/uploads/Sub-Proposed-Guidelines-for-the-Classification-of-Computer-Games-2023.FINAL010623.pdf

Framing principles of this submission

Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all. In our 2023 submission to the inquiry Parliamentary Joint Committee on Human Rights into Australia's human rights framework, we recommended that Government should introduce a Human Rights Act that provides a positive framework for recognition of human rights in Australia (Recommendation 2 of that submission).[4] We offered specific and substantive recommendations to elevate recognition of children as rights bearers and improve Australia's compliance with the Convention on the Rights of the Child.[5] That Convention has particular salience in this policy context.

Relationships Australia agrees that a key object of the National Classification Scheme (the Scheme) must continue to be the protection of children and young people from content that is not suitable for their developmental stages. This objective is arguably far more salient than when the Scheme was initially established nearly 30 years ago, because of the ease of access, by children of all ages, of a range of harmful content, with limited opportunities for parents or caregivers to oversee that access in ways that support children's physical and mental safety.

The risks of younger people becoming sexual violence offenders have recently been noted by Hill & Salter, 2024:

> While child sexual abuse by adult perpetrators ha[s] decreased significantly over previous decades, abuse by known adolescents in non-romantic relationships has in the past few years increased, to become the most common perpetrator category for victimised young people now aged 16-24. This is a significant and recent change. Historically, adults were the most common perpetrators of child sexual abuse (and still are, for people aged over 25). Now, the most common sexual offender against children is another child. These statistics are alarming on their own, but they should also raise alarm bells about the potential for future perpetration, because sexual violence in childhood is a risk fact for other violence, including domestic and family violence in adult relationships (citing ALSWH, 2022)….[6]

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[4] Available at https://www.relationships.org.au/wp-content/uploads/PJCHRhumanrightsframework.FINAL_.pdf

[5] For discussion about prevalence of child sexual abuse in contested family law matters, see Webb et al, 2021; Moloney et al, 2023; Parkinson, 2021. For prevalence of child sexual abuse more broadly, see the Australian Child Maltreatment Study https://www.acms.au/); in particular, Matthews et al, 2024 (prevalence and trends); Hunt et al, 2024 (peer sexual harassment). For prevalence of sexual violence among young people attending tertiary institutions see Heywood et al, 2022; Nisbet et al, 2022.

[6] See also Cahill et al, 2024; Madigan et al, 2018. For links between gambling and DFV, see Freytag et al, 2020; Hing et al, 2020, Hing et al, 2021.

These reforms are being progressed in an environment in which younger and younger children routinely have almost unfettered access to content that would be Refused Classification. Hill & Salter further noted

> … strong evidence that children's exposure to pornography is resulting in more severely harmful sexual behaviour, as well as other sexual behaviours amongst boys and young men (like non-fatal strangulation and spitting during sex) that girls and young women often do not want or enjoy; certainly, most do not often appreciate the danger inherent to strangulation. (Hill & Salter, 2024)[7]

It is also an environment in which individuals with an interest in child sexual abuse material face fewer hurdles to producing, accessing and distributing it, and where the pace and reach of distribution has unprecedented scope to normalise child sexual abuse among offenders and potential offenders. Salter & Whitten (2022) reported

> … significant abuse experienced by abuse material victims prior to the internet, and suggests the popularization of the internet is linked to a trend toward more serious offending against children in abuse material. The consistent role of the home as the major site of abuse material production poses significant challenges to prevention, early intervention, and prosecution.

In a review of empirical research about parental production of child sexual abuse material, Salter & Wong (2023) found that

> … parental CSAM production is common, more likely to involve pre-pubescent victims, more severe abuse, female as well as male perpetrators, and produces high-demand illegal content with serious long-term sequelae. However, the review found that the focus of child trafficking and sexual exploitation scholarship on "commercial" and profit-driven abuse has marginalized and obscured parental CSAM production as a serious policy challenge. These findings warrant a reorientation of research, policy, and practice approaches to technology-facilitated child sexual exploitation, as well as a reflection on the resistance of researchers and policymakers to acknowledging the problem of family-based sexual exploitation.

Principle 2 – Accessible and inclusive regulation

Inclusive and universally accessible services are an imperative of human rights. This is because circumstances that operate to exclude, marginalise or discriminate against individuals become barriers to full participation in economic, cultural, political, and social life through the operation of systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals, and regulators)
- policy settings that inform programme administration, and

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[7] See also the Government's media release of 1 May: Research shows 25 per cent of teenage boys in Australia look up to social media personalities who perpetuate harmful gender stereotypes. Social media algorithms can undermine gender equality by pushing misogynistic content that normalises sexist attitudes in young people.

- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

Parents and caregivers should be supported by regulatory frameworks that are clear, intelligible, accessible and inclusive. Accordingly, Relationships Australia is committed to advocating for:
- reducing complexity of the law (including the Scheme and related legislation) and its supporting processes
- reducing fragmentation, and
- ensuring high quality and evidence-based regulation, accompanied by robust accountability mechanisms.

Fragmentation

Our commitment to accessibility also underpins our advocacy for systems and processes that lift from the shoulders of those least equipped to bear them the burdens of fragmented, siloed, complex and duplicative laws, policies, programmes, and administering entities.

Cultural safety and responsiveness

The Scheme must be culturally safe. Australian governments must engage meaningfully with First Nations and Culturally and Linguistically Diverse people to ensure that the Scheme is accessible and inclusive. (Recommendation 1)

Cost, literacy, language, bureaucratic hurdles and lack of confidence in cultural safety can all impede the access of Aboriginal and Torres Strait Islander people, and people from Culturally and Linguistically Diverse backgrounds, to 'White' systems. Well-founded distrust of government agencies, among First Nations people, in matters relating to children is also a significant barrier. It should not be forgotten that the Scheme had a high profile role in the Northern Territory Emergency Response, which the then Government justified by allegations in the *Little Children are Sacred* report[8] of endemic sexual violence by First Nations adults against their children.

DISCUSSION

Clarifying the scope and purpose of the Scheme – Questions 1 and 3

The Scheme has been intended to serve two principal purposes:
- to empower community members to make informed decisions about the content they, and those in their care, consume, and
- to protect community members from unwanted exposure to material they find offensive.

These purposes are to be distinguished from that of the Online Content Scheme (the OCS) which, while relying on the *Classification (Publications, Films and Computer Games) Act 1995* (Cth) (the Classification

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[8] AHRC, 2007.

Act) for definitions of Class 1 and Class 2 materials, focuses on online content that is illegal or harmful (*Online Safety Act 2021* (Cth) (the OS Act).

However, the reliance of the definitions of Class 1 and Class 2 in the OS Act on definitions in the Classification Act blurs that distinction. In light of that, Relationships Australia **recommends** that the purposes of the Scheme be expanded to make explicit the additional (existing) purpose of the Scheme of informing the eSafety Commissioner's performance of its function to protect the community from online harms, pursuant to the OS Act. (See Recommendation 2)

Relationships Australia acknowledges community expectations that user-generated content is excluded from operation of the Scheme (ORIMA, 2022). Given its volume and highly fluid nature, classification would be impractical, although the speed with which harm can be inflicted needs to be considered in relation to content that has the propensity or intent to groom or to radicalise.[9] Accordingly, to support clarity and accessibility of the statute book, we **recommend** that the Scheme state explicitly that it does not apply to user-generated content, and include a note referring users to the powers of the eSafety Commissioner has in relation to harmful user-generated content. (Recommendation 3)

Classifiable content – Question 2

Relationships Australia **supports** the proposals at p 9 of the Consultation Paper in relation to classifiable content, subject to the underpinning concepts being defined with sufficient precision to enable creators, service providers and consumers to be confident about what is, and is not, classifiable.

Classification of publications – Question 4

To support the accessibility of the Scheme, Relationships Australia **recommends** that Government:
- implement opportunities to clarify the scope of 'submittable publication', and
- broaden the definition to include depictions or descriptions that are unsuitable for children under the age of 15 years. (Recommendation 4)

Classification guidelines and community standards and expectations

Relationships Australia welcomes the Government's multiple initiatives, announced on 1 May 2024, to 'address easy access to pornography for children and young people and tackle extreme online misogyny, which is fuelling harmful attitudes towards women.'[10]

Question 1 – Classification Advisory Panel

Relationships Australia **recommends** that the Government establish a Classification Advisory Panel. (Recommendation 5)

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[9] See, eg, Baldwin, 2016.
[10] Media release, 1 May 2024, Tackling online harms, https://www.pm.gov.au/media/tackling-online-harms#:~:text=%E2%80%9CThe%20reality%20is%20that%20digital,and%20other%20age%2Drestricted%20services. See also Coumarelos et al, 2023.

Question 2 – Composition of proposed Classification Advisory Panel

In addition to the areas of expertise mentioned at p 11 of the Consultation Paper, Relationships Australia **recommends** that, if Government establishes a Classification Advisory Panel, membership should also include people with expertise in:
- child and adolescent mental health
- child safety
- gendered violence
- intimate partner violence, gendered violence, peer sexual abuse among children and young people, and adolescents using violence in the home
- the particular challenges faced by people with disability in engaging with content, including as parents or carers of children and young people, and
- associations between exposure to radicalisation and/or grooming content and adverse outcomes. (Recommendation 6)

Question 3   Other aspects

Relationships Australia **supports** in principle:
- the announced age assurance pilot[11]
- legislation to ban the creation and non-consensual distribution of deepfake pornography, and
- the proposed new phase of the successful Stop it at the Start campaign.

To support clarity and avoid undue complexity of the law, Relationships Australia **recommends** that:
- the Scheme apply classifications across platforms, so that classification of content does not vary according to the platform on which it is delivered (see ALRC Report 118, Recommendation 9-3)
- 'exempt content' be defined, and
- the 'Refused Classification' category be replaced with a 'Prohibited' category (see ALRC Report 118, Recommendations 9-1, 11-1). (Recommendation 7)

Relationships Australia **recommends** that the Guidelines be reviewed at least every ten years. The terms of reference for these reviews should also require consideration of contemporary evidence in relation to child development, child safety, children's mental health[12] and the availability and volume of access to high impact content by children. (Recommendation 8)

Fit-for-purpose governance and regulatory arrangements

Questions 1 and 2   Consolidation under a single national regulator

Relationships Australia strongly agrees that the *status quo* is 'inefficient, fragmented and create[s] an unequal regulatory regime' (Consultation Paper, p 13) that varies according to mode of delivery. No stakeholder is well-served by such disarray, least of all community members relying on it to keep

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[11] We welcome this response to the 2019 recommendations of the eSafety Commissioner and Jaktar & Jenkinson, 2019.
[12] The Australian Child Maltreatment Study demonstrates strong associations between child maltreatment (which includes exposure to intimate partner violence and sexual violence) and mental illness, as well as other adverse health outcomes; see, eg, Scott et al, 2023; Lawrence et al, 2023; Harris et al, 2024.

children safe and adults informed. This was recognised by the ALRC in its 2012 report.[13] Reducing fragmentation, or at least lifting the burden of addressing it off the community and onto those better equipped to manage it, is a fundamental imperative of sound policy and programme development. Children who suffer online harms, and their parents and caregivers, should not have imposed upon them the requirement to work out whether they should report to the police, eSafety, or another organisation.

Accordingly, Relationships Australia **recommends** that the existing governance and regulatory arrangements be simplified and clarified. This should be done by establishing a single national regulator, as recommended by the ALRC, and conferring on that regulator a unified suite of licensing (where appropriate) and regulatory powers, as envisaged by the ALRC (see Report 118, Recommendations 16-1, 16-2, 16-3 and 16-4). Within the single entity, the Chair of the ACMA and the eSafety Commissioner, could remain independent statutory officers. This is similar to the governance model included in the Exposure Draft of the Aged Care Act. (Recommendation 9)

Establishment of a single entity would be consistent with the ALRC's recommendations, while retaining the benefits of specialisation, reducing silos and barriers to collaboration, allowing intelligence and insights to be more readily shared, and offering administrative efficiencies. The single national regulator could auspice the proposed Classification Advisory Panel, as well as the Classification Board and Classification Review Board, if they are retained (Relationships Australia does not express a view on whether the Board and Review Board should be retained).

There would be a clearer delineation between the ACMA and the eSafety Commissioner, with their array of civil sanctions, and police (AFP, and state/territory), with their broader coercive powers and capacity to charge offenders.

As envisaged by the ALRC, Relationships Australia **recommends** that the Act confer on the single national regulator the following powers and functions, supported by adequate appropriations:
- undertaking or commissioning research activities (see ALRC, Report 118, Recommendation 9-4)
- notifying Australian or international law enforcement agencies or bodies about content that is, or would be likely to be, Prohibited without having the content first classified (see ALRC, Report 118, Recommendation 12-3), and
- the functions described at Recommendation 14-1 of ALRC Report 118. (Recommendation 10)

In addition, we **recommend** offering the community a single reporting and help-seeking mechanism, available through an online portal and through a dedicated 1800 number, to which children, their parents and caregivers can give sufficient information to enable immediate connection with the appropriate agency. (Recommendation 11)

Relationships Australia **supports** regulators having access to nuanced and meaningful regulatory powers, and having the resources to exercise them, as well as being able to impose graduated sanctions which reflect culpability and harm.[14] There is little value to the community in having regulatory

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[13] ALRC, 2012, Report 118. See especially recommendation 5-3.
[14] See, eg, ACMA submission, 2020.

arrangements and sanctions that are not pursued by regulators who are not sufficiently resourced to use them. Poorly resourced regulators are also at heightened risk of regulatory capture, undermining the efficacy and credibility of regulation.

We **recommend** that, whether or not sitting within a single national regulator, the ACMA should be sufficiently resourced to regulate content that, while not falling within the scope of the eSafety Commissioner's powers, nevertheless is accessible and harmful to children. (Recommendation 12) One example of this is content promoting gambling that does not fall within scope of the recent reforms providing for mandatory minimum classification of simulated gambling and paid loot boxes.

In this regard, we draw to your attention the recommendations made in the Relationships Australia submission to the Department on 1 June 2023:

Recommendation 1

That the National Classification Code be amended to expand the principles to which classification decisions must give effect by including an additional principle that minors should be protected from material that normalises, or is likely to normalise, gambling.

Recommendation 2

That the Minister make new guidelines for the classification of computer games to replace the existing guidelines.

Recommendation 3

That the new guidelines should provide that in-game purchases linked to elements of chance and simulated gambling are not permitted in respect of the G, PG, M and MA15+ classification categories.[15]

Recommendation 4

The Classification Board should develop consumer advice to enable consumers (and, in respect of minors, parents) to make informed decisions about the use of computer games that include simulated gambling and/or in-game purchases linked to elements of chance, including (but not limited to) whether gambling with money or non-fiat currencies is a game feature and information about harms associated with online-gambling and gambling-like activities.

To the extent that these recommendations will not be implemented in the amendments to commence in September 2024, we **recommend** that Government proceed with their implementation. (Recommendation 13)

Question 4   Potential gaps or unintended consequences

Implementation of Recommendation 1 of our submission to you on 1 June 2023 would fill the current gap and address community concerns about harmful exposure, to children, of content that normalises

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[15] Acknowledging that this recommendation is partially implemented in the amendments to come into effect in September 2024.

and promotes gambling.[16] Implementation of that recommendation would also buttress enforcement of the measures to be implemented later in 2024.

Conclusion

The emergence of convergent technology, the ubiquity of harmful content and its ease of access by children, and the speed by which harm can be done, require of Australian governments a classification system that is intelligible and responsive to evolving technology and community expectations – not only expectations of choice, but also expectations of governments' role in preventing and minimising an array of complex harm. Technology-facilitated abuse (including image-based abuse) in intimate relationships, among peers and by organised crime agents, affects many of Relationships Australia clients, as does harmful gambling. In forming our recommendations in this submission, we have had regard to the 2012 recommendations by the ALRC, as well as the findings and recommendations of the Stevens Report in 2020.

Thank you again for the opportunity to contribute to the ongoing process of modernising Australia's classification scheme to ensure that it is fit for contemporary purposes, and sufficiently flexible to respond to rapidly-evolving means of creating and sharing content. Should you wish to discuss any aspect of this submission, please do not hesitate to contact me, at ntebbey@relationships.org.au, or our National Policy Manager, Dr Susan F Cochrane, at scochrane@relationships.org.au.

Kind regards

Nick Tebbey
National Executive Officer

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[16] See, eg, Browne, 2020; Greer et al, 2022; Sakata et al, 2022; Sakata & Jenkinson, 2022; AGRC, 2023a, 2023b, 2023c, and 2023d; Deblaquiere et al, 2018; Gainsbury, 2012; Gainsbury, 2015, Gainsbury et al, 2015; Wardle H & Zendle D, 2021.

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