

**Bravehearts, Carly Ryan Foundation, Child Wise and Google
Enhancing Online Safety for Children**

7 March 2014

The signatories of this submission welcome the Government's focus on important child safety matters. We are pleased to be making this further joint contribution to the Government's consultation process on *Enhancing Online Safety for Children* in addition to our individual submissions.

We all take online safety for children seriously and we have been working together to support education programs to promote the safety of children online. We have also worked together to encourage service providers to explain and promote their safety, flagging and reporting tools. Just as we need to be street smart in the offline world, we all need the know-how and tools to be 'cybersmart' online.

Another element of our work together relates to combating child sexual exploitation. We work together to better understand the ever-changing landscape of offender behaviour and language. We are optimistic that measures and technologies developed by NGOs in partnership with the technology industry will help make a real difference in the fight against these terrible crimes.

In relation to the Government's proposals, there is certainly a role for a single point of coordination in the Federal Government. The different agencies, programs and research as well as different State Government agendas could certainly be better promoted and implemented with focus and better resourcing. Education programs can always be more widely implemented with more funding.

We believe the Government should focus on drawing together existing resources and better coordinating initiatives across:

- education on online safety, especially the promotion of existing programs;
- research and its coordination with a view to evidence-based policy decisions;
- police responses and resources to ensure that existing laws are properly enforced;
- education about existing laws for bullying and harmonising laws across Australian jurisdictions;
- working collaboratively with social media providers; and
- non-criminal responses to cyberbullies and their victims including a best practice guideline to responding to cyberbullying.

We believe a central point of contact in Government for both the public and industry, such as an independent Commissioner, could be set up quickly to deal with referrals and online safety issues, including concerns about content online. The central point of contact would highlight existing avenues for reporting content for removal, and could liaise with social media providers over concerns. There are existing laws and existing infrastructure that could support a commissioner, including the Australian Communications and Media Authority.

We believe mechanisms for removal of ‘harmful’ content from social media sites are important. However, we believe a hasty legislative approach may be unworkable and inflexible. Legislation can never respond to the fast moving technology world in the way that cooperative arrangements may. In addition, legislation would not capture significant services, especially new ones based overseas. This may create the (incorrect) expectation that the Government could remove material on any website.

In relation to the proposed new cyberbullying offence, our experience is that the Australian community often doesn’t understand the current laws relevant to bullying and aren’t aware enough of their rights and responsibilities. Many parents and teachers are unaware of the multiple organisations that work on the prevention of cyberbullying and the safety tools that already exist online. There is much more to be done to educate people about those laws, resources and tools.

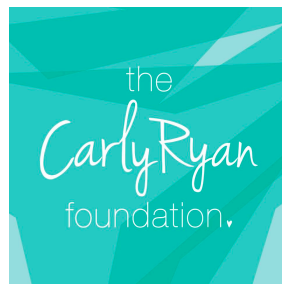
Once a commissioner is in place they would have the opportunity to assess what is needed to be effective in promoting online safety. The commissioner would have the opportunity to see how they could best work with different agencies, governments, NGOs and industry groups. The commissioner would be able to properly identify whether social media providers are taking appropriate steps to make sure their users have the proper tools to flag content, and which companies and organisations are not being cooperative.

Again, we thank the Government for being active around this important matter.

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