Comments

1. Functions and powers of the eSafety Commissioner
	1. Whilst the Commissioner has the responsibility to safeguard older Australians, primary focus still very much appears to be children and bullying.
	2. Online and telephone scammers are particularly active in targeting this group. The commissioner needs to be active in ensuring that agencies promoting online services recognise that they will exposing this group to these new dangers.
	3. Senior Australians are likewise subjected to bullying and financial as well as physical abuse. The commissioner should be more active in protecting vulnerable elderly (VE) from these forms of abuse.
	4. Similarly, enhanced reminders/education for guardians about their legal responsibilities and duty of care and a simplified national guardianship scheme is needed for VE.
	5. In addition, mandatory checks for financial probity relating to guardians who are beneficiaries prior to probate being granted could help protect the VE.
2. Online content scheme – Other issues
	1. The need for Online Privacy is not readily understood by late adopters of technology. The Commissioner should have a priority focus on enhanced protection from the unnecessary collection of data online. In particular, working with online mega corporations to minimise collection of unnecessary data and deliberate [deception by design](https://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=11&cad=rja&uact=8&ved=0ahUKEwiApeuw1qzcAhXFbrwKHWYeDjIQFghLMAo&url=https%3A%2F%2Ffil.forbrukerradet.no%2Fwp-content%2Fuploads%2F2018%2F06%2F2018-06-27-deceived-by-design-final.pdf&usg=AOvVaw3vsN-GBJfDnW66O37oAw_2) as is being done by the [GDPR](https://en.wikipedia.org/wiki/General_Data_Protection_Regulation) in Europe. This should be a natural extension of its work on bullying.
	2. ASCCA clubs see the very real difficulties the VE are exposed to via some government agencies, as they struggle to gain the skills to use MyGov and Centrelink. The Commissioner needs to play a strong role here in representing the VE to ensure that these agencies take much more responsibility in training this group to use their services, rather than one off exercises. In our volunteers’ experience, occasional use services eg annual or 6 monthly, the VE will need continual retraining as many simply cannot retain those online skills over that time.