

2 August 2018

Ms Lynelle Briggs AO
Australian Public Service Commissioner
co/ Director, Online Content and eSafety Section
Department of Communications and the Arts
GPO Box 2154
Canberra ACT 2601

By email: onlinesafety@communications.gov.au

Dear Ms Briggs AO,

The Interactive Games & Entertainment Association (IGEA) is the peak industry association representing the business and public policy interests of Australian and New Zealand companies in the interactive games industry. IGEA's members publish, market, develop and/or distribute interactive games and entertainment content and related hardware.

We welcome the opportunity to provide input into the statutory review of the *Enhancing Online Safety Act 2015*.

Background

The video games industry takes the online safety of our consumers very seriously. Across the board, our members implement robust tools at multiple intervals within the gaming experience, designed to allow players to report incidents of bullying or other inappropriate behaviour (which can lead to suspensions and bans, where appropriate) and directly address such behaviour by muting and/or blocking. Not only do the major game consoles (i.e. Nintendo Switch, Xbox One, PlayStation 4), online services (i.e. Nintendo Switch Online, Xbox Live, PlayStation Network – which operate on several platforms and endpoints including mobiles and PCs), and PC platforms themselves provide such facilities, but individual games with online capabilities typically offer additional means via which issues such as harassment and bullying can be reported directly to the game publisher or developer.

It is also important to note that these aforementioned tools are provided in addition to parental controls that are still in enabling parents and carers to ensure that younger users have a fun and safe online gaming experience. For instance, parental controls can be implemented on some game consoles and platforms to ensure that children are not able to communicate with other players, view content shared by others, add new friends, join multiplayer games, and so on.

Submission

While IGEA will not be submitting a substantive response to the review, we have had the opportunity to consult with The Digital Industry Group Inc (DIGI) during the drafting of their response and of reviewing their final submission to the statutory review. IGEA are wholly supportive of the issues raised by DIGI, specifically:

1. The scope of the Office has moved beyond the original intent and the enacting legislation often duplicating the work of other organisations.
2. The focus of the Office should be on education and awareness raising of online safety tools and resources that already exist, rather than operating as a regulator. The Office should act as the amplifier for the many programs and tools and the expertise that already exists.
3. In addition to the above, focus and consideration should be given to how the Office can drive positive behavioural change.
4. The tiering system for the cyberbullying scheme should be removed. A social media service complying with the safety requirements of the Act should be treated as a responsible actor.

With regards,



Ron Curry
CEO