

To whom it may concern,

I am writing to submit my concerns about the Online Safety Act 2021. I am a photographer, writer, political organiser & full service sex worker (FSSW). I have worked as FSSW for almost a decade, worked as a political organiser/ photographer with a broad spectrum of not-for-profit organisations across Australia and Europe, & made it a life mission to create thought provoking art which challenges hegemonic ideas & myths about beauty standards, sex, patriarchy, & activism. I use the internet every single day to keep in contact with the various communities I am a part of, share my photography & writing, stay informed & educated by following many educators, writers & advocates on social media, share educational material with my followers, & communicate with consumers of my creative work. My work in political spaces has always relied on social media to ensure crucial campaign information reaches the right people, & create digital spaces for communities to communicate, plan & mobilize.

As a FSSW I use the internet every day to communicate with & advertise to my client, to access protocols & measures which keep us safe from violent clients, to stay up to date on industry changes and legislation, to communicate privately with my clients & to share content with my subscribers.

My ability to reach clients as a FSSW, & thus the majority of my income, depends solely on my visibility online. As the world has grappled to keep up with the increasing intertwinement of humans and the internet; policy makers have sought to regulate and police it. Policy intended to keep people safe online often leaves vulnerable communities as collateral damage. As a result we have seen censorship and de-platforming disproportionately target sex workers, sex educators, & many body/sex-positive communities.

I acknowledge that the internet must be a safe place for minors, but we too must preserve our right to express ourselves sexually online. As the ones most affected by this we deserve to be part of the dialogue around legislation that could impede the rights of consenting adults with a right to sexual expression & access to online spaces. I think this bill has failed to consider its impact on sex workers, and sex positive/ body positive educators, artists & activists.

Concerns with the bill

Clarity & Accountability

As a FSSW I am worried about the lack of clarity on how to comply with this bill, and that there is limited information on methods of review or recourse should my content be restored.

Sex workers are a constant target for morality trolls, who target us online and report our content with the intent of disruption & bullying us offline.

For example if someone reports my content unfairly & my content gets removed while I am working- I will lose my advertising for potentially days, & will have lost money on overheads. Should I appeal and my content is found not to be in violation, it is unclear whether there is any method of recourse for lost income, or accountability for the E-commissioner.

Sexual services & industries deserve the right to exist on the internet & advertise like any other business- yet we are constantly having to appeal our right to be there even when we are observing terms of service. More transparency about decisions made by the E-commissioner can help create systems of accountability.

Caught in the Net

In the United States, SESTA/FOSTA lead to sex workers being all but totally erased from online spaces. Websites were forced to comply with this bill, and as a result they purged the accounts and advertisements of many workers- forcing them underground & creating unsafe working conditions for FSSW¹. Similarly, we know that social media platforms use algorithms to ensure user compliance to T&C's, but also to prioritise certain content on the platform. I am worried that this bill will further incentivise social media platforms to police their users & continue to erase our networks and communities.

I have already seen how these changes to T&C's have affected us. I have been the target of algorithmic policing on my own accounts; having content removed which does not violate community standards removed, having to self-censor as a way of evading . There seems to be a double standard amongst this type of policing; as fat, black & brown, LGBTAI & gender-diverse people are often the first to be targeted by this type of policing. Tiktok has even admitted they suppress content by the aforementioned groups.²

I have watched my friends, colleagues & peers be deleted, censored & deplatformed all while staying within community guidelines. Advocates, activists, artists, & sex educators

¹ <https://www.vox.com/culture/2018/4/13/17172762/fosta-sesta-backpage-230-internet-freedom>

² <https://slate.com/technology/2019/12/tiktok-disabled-users-videos-suppressed.html>

have lost wealths of educational information, networks of peers- leaving communities of like minded people are without access to crucial information on health & safety- but also without access to eachother. I'm sure you can understand the impact of this during the pandemic, especially on already stigmatised groups of people who may not have anyone else to discuss these issues with in their real lives.

Equitable Access to Non-Consensual Image Sharing Protocols

I support an Online Safety Act which allows victims of non-consensual image sharing to seek justice & feel safe in the knowledge the law protects them. There are some issues regarding equitable access of these protocols for sex workers, porn performers or content creators.

Consent is nuanced, can be conditional, and can be withdrawn. For example if I create a video with another sex-based content creator (whether it is porn or for educational purposes)- there will be a specific set of terms for how, when and where this content- which website it is & isnt allowed to be on, for how long. If the other creator shares this content outside of our terms, I need to feel safe that I can access to recourse through the ESC which acknowledges that while I did consent to that content being shared- I only did so on X website and not Y.

Our community is also worried that we will not have access to these services without having to divulge our legal names. For us to have equitable access to these services they must acknowledge our unique & complex challenges sex workers face when navigating online spaces, and they must protect our privacy and safety.

Additional Comments

Furthermore, I support the recommendations made by Scarlet Alliance with regards to the importation of old & outdated classification systems for R18 & RC content.

Thank you for your consideration. I hope this has been useful in identifying ways to amend this bill to protect our right to safe sexual expression online. I hope that in future the sex work community can have a seat at the table for discussions with primary effect us.



I acknowledge the Gadigal people of the Eora nation as the traditional owners of the land on which I live and work, and pay my respects to Aboriginal and Torres Strait Islander Elders past, present, and emerging.