



Geraldton Community Legal Centre

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30 June 2017

The Director
Online Content Section
Department of Communications and the Arts

By email: onlinesafety@communications.gov.au

Dear Sir or Madam

Civil Penalties Regime for Non-Consensual Sharing of Intimate Images

The Geraldton Resource Centre ("GRC") (to be re-named Regional Alliance West from 1 July 2017) is a non-government organisation that operates to service the needs of disadvantaged members of the community. All members of management and staff are committed to developing greater community awareness on the social issues that unjustly affect the disadvantaged in our community.

GRC delivers a range of legal, financial, housing and community support services into a vast area of regional, rural and remote Western Australia throughout the Midwest, Murchison and Gascoyne. We regularly conduct outreach trips to the remoter communities within these regions from our two bases in Geraldton and Carnarvon. Our Community Legal Service has a specific program to provide outreach legal services to Indigenous women.

A significant number of our clients are experiencing or have experienced family and domestic violence and so our staff have experience and training in these issues.

Throughout our client group, we are seeing an increase in all forms of technology facilitated abuse, including the non-consensual sharing of intimate images.

We are supportive of the proposal for the establishment of a prohibition against the sharing of intimate images without consent and the introduction of a civil penalty regime targeted at those involved in the sharing of these images as well as the content hosts.

We are not in a position to respond in detail to the questions raised in the May 2017 Discussion Paper except to indicate our broad support and to make one comment in relation to minors who

share images. We are of the view that special consideration should be given to minors, who in their immaturity may be less aware of the damage that can be done from their actions, and any scheme that is introduced should recognise this factor in how it deals with them.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'alison muller', written in black ink.

Alison Muller

Principal Solicitor

Geraldton Community Legal Centre