

# The Internet Search Engine Services Online Safety Code.

Inquiry Submission

19 September 2025

Mr Tas Larnach  
Committee Secretary  
Environment and Communications References Committee  
Senate Standing Committees on Environment and Communications

Dear Mr Larnach

ARACY - the Australian Research Alliance for Children and Youth welcomes the opportunity to contribute to this inquiry. Through our *Young and Wise* Roundtables — funded by and co-designed with the Australian Government Department of Health, Disability and Ageing — ARACY brings forward the lived experiences of young Australians, ensuring policy is informed by those most affected.

We focus our submission on Terms of Reference where young people's voices offer the strongest insights. We invite the Committee to read what young people had to say in the Young and Wise Roundtable series at <https://www.aracy.org.au/resources/>. Our Roundtable on [Social Media and Mental Health](#) is particularly relevant to this inquiry.

## Responses to the Terms of Reference

### a) Privacy and Data Protection

Young people stressed confidentiality concerns, particularly in small or rural communities. Verification regimes that don't protect privacy will drive disengagement. Any age-verification scheme must prioritise privacy safeguards and transparent data handling, or risk driving young people away from accessing digital spaces altogether. This would negatively affect their mental health as online spaces are where young people find connection to and affirmation from peers.

### b) Corporate Data Collection and Profiling

Young people said formal supports like Kids Helpline or Headspace felt "impersonal, slow, and non-tailored," describing them as "*faceless entities*".



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Any regulatory framework that increases corporate data collection will deepen this mistrust if it is seen as surveillance or profiling.

### c) Technical Implementation and Efficacy of Age Verification and Filtering

Young people reported that introducing access only at 16 without preparation is *“like handing over a car without any driving lessons”*

They recommended early, age-appropriate digital literacy in schools, so they are prepared to self-regulate and navigate risks well before restrictions are lifted.

### d) Alternative Approaches to Online Safety

Young people cautioned that removing social media without replacement risks creating a harmful void. *“What if social media support wasn’t ripped away, but replaced with something better?”*

They identified opportunities to co-design youth-friendly platforms that preserve safe peer connection and anonymous advice, while also investing in offline and hybrid opportunities to reduce isolation.

### e) Oversight of Online Safety Codes

Participants in the Budget Youth Priorities Roundtable highlighted their frustration that *“policies are made about us, not with us”*.

Young people called for compulsory youth consultation and, in some cases, structural reforms such as a [Commissioner for Future Generations](#) to ensure long-term accountability. Oversight of online safety codes must embed direct youth representation.

### f) Global Experience and Best Practice

International standards such as the UNCRC General Comment No. 25 emphasise children’s rights in the digital environment. Locally, the Alannah & Madeline Foundation’s **eSmart** program demonstrates the impact of scalable, evidence-based prevention. In 2024, **83% of students who completed an eSmart module demonstrated digital skills that protect them from harm and enable them to thrive online** ([Alannah & Madeline Foundation 2024 Report to the Community](#)).

Programs like this show the value of pairing regulation with school-based education that builds resilience and capability. ARACY recommends rapidly expanding access to such programs nationally.

### **g) Other Related Matters – Wellbeing as the Metric**

The ARACY Young and Wise Social Media + Mental Health Roundtable concluded:  
*“What if wellbeing was the metric for digital policy?”.*

While reduced exposure to harmful content was seen as positive, others feared bans would increase isolation, especially for disabled, LGBTQIA+, and rural young people. Young people urged government to measure digital policy against wellbeing indicators such as connection, inclusion, and safe identity expression.

### **Conclusion**

ARACY welcomes this inquiry as an opportunity to centre young people’s voices in online safety regulation. Their message is clear: protections must be paired with preparation, privacy with trust, and regulation with opportunities for genuine consultation and co-design. Above all, every effort must be made to mitigate the unintended mental ill-health consequences of removing a “lifeline” that many children and young people have woven into the fabric of their daily lives. Achieving this requires the Communications, Social Services, Health, and Education Departments to work together to ensure children and young people can thrive seamlessly across both online and offline environments.

Sincerely,

Prue Warrilow  
CEO  
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