REACHOUT

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

RE: Inquiry into Internet Search Engine Services Online Safety Code

Dear Committee Secretary

ReachOut is Australia's leading digital youth mental health service and, as such, takes a keen interest in online safety policy.

While the technical details of technologies, codes and oversight underpinning the forthcoming regulations are outside the direct expertise of ReachOut, we welcome the opportunity to make a brief contribution to this inquiry, particularly regarding the context for privacy and data protection considerations and additional approaches to online safety.

Privacy and data protection context

Contrary to some public perceptions, young people are keenly attuned to privacy and data protection issues, with many taking active steps to assess and mitigate risks.

In recent digital product co-design consultations with young people, discussions were nuanced, revealing particular concern regarding personal information, addresses and financial account details, and resignation that for some platforms sharing data is an unavoidable cost of entry.

It is therefore unsurprising that many young people provide modified information when their trust in a platform or service is low in order to protect their privacy.

Modifying information can also be a common and legitimate practice for young people when they may not feel safe - for instance when seeking information or support for sensitive matters or when exploring their identity. In fact, in research released last year, 89 percent of young people surveyed reported that they were concerned (41 per cent very or extremely, 48 per cent moderately or slightly) about their privacy when searching for mental health information on digital platforms.[1]

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[1] ReachOut Australia, Harnessing the feed: Social media for mental health information and support. Sydney: ReachOut Australia, 2024.

Better mental health and wellbeing for all young people

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Additional approaches to online safety

With the new minimum age requirements due to come into effect from 10 December 2025, ReachOut is concerned that momentum for further online safety reform may stall.

This is particularly important as we believe that young peoples' engagement with online platforms will continue, both via circumvention by some users and in digital spaces not subject to this regulation, including spaces where there are currently limited or no safety protections for users.

There are a range of additional approaches to online safety that would benefit all users, including young people. These include:

- Embed safety by design principles, including addressing 'sticky features' like infinite scroll, excessive notifications and gamification of engagement
- Co-designing new safety features with young people to ensure that they are likely to be effective and fit-for-purpose
- Increased investment in digital literacy and online safety programs for young people
- Providing support and advice for parents on how to safely support their children's use of digital platforms
- Ensuring users can easily control or reset their algorithm, limiting the harmful content they are exposed too
- Tackle misinformation, including by establishing a model to enable verification of credible mental health information

We urge the government to prioritise further reform, and to invest in digital literacy and skills building to ensure that young people are equipped to safely engage in digital spaces, and that parents and carers are equipped to effectively support them.

ReachOut trusts this submission is of assistance to the Committee.

Yours sincerely

Ben Bartlett
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