Internet Search Engine Services Online Safety Code

A submission to the Environment and Communications References Committee

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yourtown is a trusted provider of services for young people, with a focus on mental health and wellbeing, parenting and early childhood development, long-term unemployment, prevention of youth suicide, child protection, and support for those experiencing domestic and family violence. **yourtown** has evolved to helping hundreds of thousands of young people each year through a range of service offerings, supporting them through many difficult challenges.

Our services

- Early intervention mental health services for children aged 0-18 years old and their families
- Domestic and family violence refuge, transitional housing, and therapeutic supports for women and their children, including post-refuge support
- Accommodation and therapeutic supports for young parents and their children at high risk
- Parentline, a telephone and online counselling and support service for parents and carers in the Northern Territory and Queensland
- Young Parents Program providing parenting support to help with child development, life skills and health and wellbeing activities in safe, supportive environments.
- Kids Helpline, providing professional counselling and support 24x7 to 5–25-year-olds across Australia since 1991
- Kids Helpline @ School delivering early intervention and prevention programs to primary and secondary schools nationally
- My Circle, a confidential, private, online peer support network for 13–25-year-olds to share information and build coping skills, and
- Employment, education, and social enterprise programs to support young people at risk of long-term unemployment re-engage with education and/or employment.

Kids Helpline

yourtown's Kids Helpline is Australia's only free and confidential 24/7 phone and online counselling service for those aged 5 to 25. It offers children and young people a range of care options that are right for their needs and circumstances. Our commitment to being there anytime, and for any reason, has meant that we have responded to more than 9.0 million contacts from children and young people nationally in the 34 years since our service was first established, while also providing tens of millions of self-help interactions via our website and social channels. In 2024, our Kids Helpline counsellors responded to 133,386 contacts from children and young people across Australia, including 4,632 crisis responses for children and young people at imminent risk of harm.

Kids Helpline @ School

Kids Helpline @ School is **yourtown's** national early intervention and prevention education program, delivered virtually into classrooms by professional counsellors. The program designed to normalise help-seeking behaviours and equip students with tools for lifelong mental health and wellbeing. In 2024, 79,527 primary school children were reached by Kids Helpline @ School sessions from 537 schools across Australia, and 70,508 high school students were reached by Kids Helpline @ School sessions from 134 schools across Australia. These sessions help children and young people build emotional literacy, resilience, and help-seeking behaviours, while addressing topics such as bullying, mental health, relationships, and online safety. The program continues to be a vital support for educators and families, offering a proactive approach to mental wellbeing in school communities.

My Circle

My Circle is a free, confidential, and clinically moderated online peer support platform for young people aged 12–25, developed by **yourtown's** Kids Helpline in partnership with the Bupa Foundation. In 2024, 3,558 young people actively engaged with My Circle, accessing support for mental health, relationships, identity, and wellbeing. The platform offers a safe digital space for young people to connect with peers and build coping strategies under the guidance of trained moderators. It is particularly valuable for those in rural and remote areas who face barriers to traditional services.

Parentline

Parentline offers free confidential phone and webchat counselling and support for parents and carers of children in Queensland and the Northern Territory. It offers a safety net for families by providing support when it is most needed. This includes after hours and weekends, where families feel isolated and where local services are unavailable. In 2023-24, there were more than 7,000 counselling contacts with parents and carers in Queensland and the Northern Territory.

Family and Domestic Violence Refuge and Transitional Housing

yourtown's refuge offers supported accommodation for up to 12 weeks. A specialised team provides women and children with a safe and welcoming environment and creates opportunities for mothers to re-build self-concept and experience control and empowerment over their lives. The wrap-around care also includes linking with transitional housing and community outreach programs for women and children exiting refuges. Transitional housing is a vital steppingstone for women and children moving towards long term, safe and sustainable independent living in the community. In addition to refuge support **yourtown's** transitional housing offers a safe and supportive environment for 6 – 12 months, with support for legal and financial matters, accessing pre-employment support, and helping children into school. In 2023-24, we supported 20 families (including 33 young children) in our refuge and 24 families (including 43 children) in our transitional housing.

Employment Services

For over 20 years **yourtown** has been delivering specialist youth employment services. Our employment services programs, including Transition to Work, Skilling Queenslander for Work, and Get Back in the Game provide young people with training to expand their options and help them find sustainable employment. During 2023-24 there were more than 7,000 commencements in our employment services and programs in South Australia, Queensland, and New South Wales.

Social Enterprises

yourtown has worked with young people and employers to break down barriers to sustainable employment for 25 years. As a leader in work-based enterprises we provide young people at risk of long-term unemployment paid jobs in the following areas: construction, landscaping, and asset maintenance to help their transition to open employment. In 2023-24, almost 200 young people were employed in our social enterprises across South Australia, Queensland, New South Wales, and Tasmania.

yourtown welcomes the opportunity to contribute to the Senate inquiry into the implementation of regulations aimed at protecting children and young people online, with reference to the Internet Search Engine Services Online Safety Code and the under 16 social media restrictions. As a national organisation supporting children, young people and families, we have insight into their lived experiences navigating digital environments. **yourtown** delivers counselling and support services via digital technology, including Kids Helpline (Australia's only free, confidential 24/7 phone and online counselling service for 5–25-year-olds), My Circle (a confidential, private, online peer support network for 13–25-year-olds), and Parentline (a free, confidential telephone and online counselling and support service for parents and carers in Queensland and the Northern Territory, which now also offers My Circle for Parents—a secure online peer support community where parents and carers can connect, share experiences, and access guidance from professionals and peers facing similar challenges). In addition to direct counselling, **yourtown** provides a wide range of educational information and resources online to empower children, young people, and parents and carers with knowledge and strategies about a range of issues including mental health, bullying, suicide prevention, self-harm, domestic and family violence, drug and alcohol misuse, child abuse, and relationships with families, peers, and partners. Our submission focuses on ensuring that regulatory frameworks protect without inadvertently creating barriers to help-seeking, inclusion, or autonomy.

Privacy and data protection implications of age verification

The introduction of age verification mechanisms raises significant concerns about the privacy of children and young people. These mechanisms often require the collection of sensitive personal data, including biometric identifiers or government-issued documents, which may expose young users to risks of surveillance, data breaches, and misuse.

Young people consistently tell us that privacy is a core value in their online lives. They want to feel safe and respected and are often reluctant to engage with digital services that require unnecessary or intrusive personal data. This is especially true when seeking help for sensitive issues, where confidentiality and trust are paramount. **yourtown's** Your Voice themes highlight that young people value platforms that protect their privacy and autonomy, and that any regulatory framework must balance safety with the right to seek support and maintain confidentiality.[1]

yourtown recommends that age assurance be privacy-preserving by design. Providers of internet search engine services should use anonymous age estimation techniques or tokenised verification systems that do retain personally identifiable information. The Code should state that age assurance mechanisms must minimise data collection, avoid biometric profiling, and ensure that no personally identifiable information is retained beyond the verification process. Research from the UK Information Commissioner's Office and the eSafety Commissioner supports this approach, highlighting the need for proportionality and data minimisation in child-focused digital regulation.[2][3]

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[1] **yourtown.** (2025). Your Voice 2025. https://ytn-p-001.sitecorecontenthub.cloud/api/public/content/b4109320b71d4f5b97c9105a8fa142c3?v=8e264ef3
[2] Information Commissioner's Office. (2020). *Age appropriate design code: A code of practice for online services*. https://ico.org.uk/for-organisations/guide-to-data-protection/key-data-protection-themes/age-appropriate-design-a-code-of-practice-for-online-services/
[3] eSafety Commissioner. (2023). *Privacy and safety for children and young people online*. https://www.esafety.gov.au/about-us/research/privacy-safety-children-young-people-online

Expansion of corporate data collection and user profiling

Compliance with the Online Safety Code may inadvertently incentivise platforms to expand their data collection practices to meet age assurance and content filtering requirements. This could lead to increased behavioural profiling of children and young people, undermining their right to privacy and exposing them to commercial exploitation.

yourtown recommends that the Code explicitly prohibit the use of age verification data for advertising, behavioural tracking, or any secondary purpose. The Code should contain a targeted clause about how data collected for the purpose of age assurance or content filtering must not be used for advertising, behavioural profiling, or any secondary purpose. The ACCC's Digital Platforms Inquiry[4] and UNICEF's global studies[5] have shown that children are particularly vulnerable to opaque data practices.

Technical implementation and efficacy of age verification and content filtering

While the intent of content filtering is to reduce exposure to harmful material, without careful implementation the Online Safety Code may inadvertently block or obscure access to help-seeking resources for children and young people. Overly broad content filtering and age verification mechanisms have the potential to prevent vulnerable users from finding information and support for issues such as suicide, self-harm, drug use, child abuse, sexual assault, domestic and family violence, alcoholism, and harassment. International research highlights that automated filters and parental controls can sometimes block access to legitimate support services, especially when keywords related to self-harm, abuse, or mental health are involved, underscoring the need for regular review and whitelisting of accredited help resources.[6]

yourtown recommends that content from accredited mental health, crisis support, and child protection services must be exempt from filtering and delisting obligations under this Code and require search engine providers to implement whitelisting mechanisms. International best practice, including the UK Safer Internet Centre's approach, supports nuanced filtering that distinguishes between harmful and help-oriented content.[7][8] Regular review and consultation with young people and service providers should be mandated to ensure that help-seeking is never compromised by online safety measures.

Alternative technical approaches to online safety

Current regulatory approaches rely heavily on filtering and age gating, which may not be effective or inclusive for all users. Our consultations with young people consistently show a preference for tools that respect autonomy while offering safe online environments. This is strongly reflected in the findings of Your Voice 2025, where young people emphasised the importance of having control over their online experiences while still feeling protected and supported.[1]

yourtown advocates for the adoption of user empowerment tools that support informed decision-making and access to support. These include contextual safety prompts, in-platform reporting and escalation mechanisms, and co-designed safety settings developed

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[4] ACCC's Digital Platforms Inquiry: Australian Competition and Consumer Commission. (2019). *Digital platforms inquiry: Final report*. https://www.accc.gov.au/publications/digital-platforms-inquiry-final-report
[5] UNICEF. (2021). *Children and digital marketing: Rights, risks and opportunities*.
https://www.unicef.org/globalinsight/reports/children-and-digital-marketing-rights-risks-and-opportunities
[6] UNICEF. (2021). *Children and digital marketing: Rights, risks and opportunities*.
https://www.unicef.org/globalinsight/reports/children-and-digital-marketing-rights-risks-and-opportunities
[7] Livingstone, S., & Third, A. (2017). Children and young people's rights in the digital age: An emerging agenda. New Media & Society, 19(5), 657–670. https://doi.org/10.1177/1461444816686318
[8] UK Safer Internet Centre. (n.d.). Parental controls. https://saferinternet.org.uk/online-issue/parental-controls

with input from young people. The Code should contain a clause stating that providers of internet search engine services must offer user-centric safety tools that support informed decision-making and access to support, particularly for children and young people.

Appropriate oversight mechanisms for online safety codes

Oversight of the Online Safety Code is conducted by the eSafety Commissioner under the Online Safety Act, with industry consultation ensuring transparency and accountability. The UN Committee on the Rights of the Child has emphasised the importance of participatory governance in digital regulation,[9] and **yourtown** supports inclusive oversight to maintain the Code's responsiveness and accountability.

yourtown recommends that oversight mechanisms include independent child rights experts, youth representatives and civil society organisations to ensure the Code reflects community values and the lived experiences of children and young people. To solidify this approach, a clause could be inserted about the requirement for representation from child rights organisations, youth advocates, and independent experts in the Code's review and enforcement processes.

Conclusion

yourtown supports the intent of the Online Safety Code and the under-16 social media ban but urges the Committee to ensure that these measures do not inadvertently harm the very children and young people they aim to protect. Our recommendations aim to balance safety, privacy, and access to support, grounded in evidence and lived experience. We welcome the opportunity to explore these ideas with you in further detail. Should you require further information about any issues raised in the submission, please do not hesitate to contact Tracy Adams, CEO of **yourtown** via email at advocacy@yourtown.com.au.

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[9] United Nations Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment (CRC/C/GC/25). https://digitallibrary.un.org/record/3906065