

Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600
ec.sen@aph.gov.au

28 October 2025

Dear Committee Members,

Internet Search Engine Services Online Safety Code and the under-16 social media ban

Thank you for the opportunity to give evidence to this inquiry.

I am writing to respond to two questions on notice arising during the discussion.

Questions on Notice

Senator Henderson – tokenized solutions

During the hearing, I said: *“Going forward, we’ll be moving to a system of tokenised solutions where, having done one age check, you just have an encrypted token on your device and then any platform that you’re going to, for a set period of time, will be able to rely on that token. That’s a much better system which we’ll very shortly be launching here in the UK.”*

AgeAware is a solution developed by euCONSENT ASBL, a non-profit organisation created following a project funded by the European Commission to create interoperable age verification in 2021-22. This created a proof of concept which allowed a user to do an age check with one website supplied by its age verification provider and then re-use that check on another website even if it was using a competing AV provider. Last year, with funding from Safe Online, this system was updated to work with signed tokens issued to the user’s device after they complete an age check, that can then be recognised by other sites and platforms. There is a commercial model behind this approach that shares the cost of the initial check across all the services which subsequently make use of it. The token is valid for a limited period, agreed with regulators, and users may need to periodically prove they are still the same user of the device holding the token who completed the age check.

This solution is now live with three AV providers in the UK and will be extending to others shortly. It is the intention of euCONSENT to make this interoperability capability available in Australia from December so social media users may not need to prove their age more than once to access all their various accounts.

Another AVPA member, Opale, offers AgeKeys, which is an alternative approach which also delivers interoperability to participating providers.

Senator HENDERSON: prevention of online bullying of children

Senator Henderson asked if, in the case of 14-year-old children at a particular school in the UK, there were serious threats of bullying and the like online, how is that prevented under [the UK] legislative framework?

During the hearing I said: *“The platform shouldn’t allow that to be a systemic problem on their platform. They have to do a risk assessment and say: ‘Right. Our platform could be used for bullying. How can we deal with that?’ Then they have to come up with their own policies, which might be, for example, reporting and blocking, or not allowing a pile-on, for example, by having multiple contacts in a very short period of time. So it’s very much down to the individual platforms to*

adapt their own policies, but they have to document those, and those are subject to review by the regulator.

To elaborate, in the United Kingdom, the Online Safety Act 2023 empowers Ofcom to regulate online providers offering “user-to-user services” (i.e. social media) likely to be accessed by children to prevent online bullying through mandatory safety duties. As outlined in Ofcom's Protection of Children Code of Practice, “bullying content” is designated as a priority form of content harmful to children under section 62 of the Act, requiring providers of services at medium or high risk to implement robust measures, including annual risk assessments, clear terms of service prohibiting such content, easy-to-use reporting tools for swift moderation and removal, and child-friendly controls like blocking/muting users, disabling comments on posts, and requiring active confirmation for group chat invitations to mitigate encounters with abusive material. These obligations, effective since July 2025, aim to ensure proactive algorithmic filtering and governance accountability, with non-compliance risking fines up to 10% of global revenue.

Yours sincerely

Iain Corby
Executive Director