

**Submission to the House Select Committee on Social Media  
and Online Safety into Social Media and online safety**  
**Submitted by**  
**Fighters against child abuse Australia [FACAA]**



---

**6<sup>th</sup> of March 2022**

This submission was prepared by Fighters against child abuse  
Australia FACAA.  
PO BOX 404 Moorebank  
NSW 1875

Web : [www.facaaus.org](http://www.facaaus.org) / [www.facebook.com/facaaus](https://www.facebook.com/facaaus)



Table of contents:

---

About Fighters against child abuse Australia .....3

Introduction .....3

Questions and answers .....4

Conclusion.....15



## **About Fighters Against Child Abuse Australia**

---

Our mission is to end child abuse once and for all within Australia.

Our vision is to make Australia the only nation on the planet that does not suffer from the scourge that is child abuse.

Our guiding principles are to remain completely non-denominational and non-political to achieve our mission of ending child abuse once and for all by whatever means are necessary (within the laws of the land).

FACAA has been working actively for the past 11 years to end child abuse within Australia. We are currently running a several programs with this one goal in mind.



## **Introduction**

---

To come up with our responses for this submission FACAA once again put the call out to our membership in the form of social media posts across all platforms. The response was overwhelming, we have never received such an avalanche of responses to a call for information before.

Every child has access to social media in one form or another and every parent is worried about the access children have to

each other and the access adults have to children.

There are literally 212 significant social media platforms (and many more non-significant) Facebook alone has 2.91 Billion active accounts with an estimated twice that in non-active accounts and that is just one platform.

The overwhelming response to our call out was a very negative one. Bullying is rife on every social media platform and none of them do enough to combat this horrendous problem. We have all seen the effects bullying can have on children, from social awkwardness to suicide and every symptom of trauma in between our social media platforms simply do not do enough to stop bullying



## **Questions and answers**

---

*(A). The range of online harms that may be faced by Australians on social media and other platforms including harmful content or harmful conduct.*

Our responders were quite specific in the harms they had faced on social media.

Literally every single female respondent reported having unsolicited and unwanted genital photos sent to their inbox. There were reports made, profiles deleted, and the same men were sending the same unwanted genital photos from different accounts.

Most children who responded reported some sort of online bullying. One child reported online bullying organised by specific leaders hiding behind fake accounts. Despite multiple reports being made to the social media platforms nothing was done. We all know the effects bullying can have on children especially on

social media so this lack of response is simply not good enough.

Several respondents reported outright racism, we will spare you the words used but any use of racist terms is completely unacceptable. Once again reports were made, and very little response was received.

FACAA were personally responsible for reporting a group called “Boy lovers” to Facebook. The group’s description read, “A place to find young boys to....” We were told “this group does not violate our community standards” I can not tell you how disturbing that was especially considering the amount of good people who have lost their accounts for no reason whatsoever.

As well as groups made to share contact details of children to abuse FACAA have seen dozens of Tumblr accounts set up with the express purpose of sharing child abuse material. Once again reports of these accounts nearly always fall on entirely deaf ears.

Very inappropriate sexual comments towards children were also reported to Facebook by FACAA. Comments including references to raping, abusing, hurting and frequently telling the victims to kill themselves. All of which did not violate Facebook’s community standards.

Several respondents reported extreme sexual content being found on every social media platform they were on. Content featuring violent and detestable acts all of which were filmed and shared on social media.

In summary FACAA respondents reported, unwanted, unrequested sexual photos, racism, sexism, violence, child abuse material, severe bullying, threats of

violence, rape, abuse and criminal behaviour. All going on the major social media platforms and all seemingly with the apps blessings.

*(B) Evidence of*

*(I) the potential impacts and online harms on the mental health and wellbeing of Australians.*

*(II) the extent to which algorithms used by social media platforms permit, increase or reduce online harms to Australians*

*(III) existing identity verification and age assurance policies and practices and the extent to which they are being enforced;*

(I) Being exposed to any of the above harms leaves children and adults both feeling victimised and abused. For literally every female respondent to say that unwanted, unsolicited, and unrequested photos of people's genitals to be sent to their inbox and nothing to happen as a result except the account to be deleted is literally sexual assault, sadly it is just an accepted part of social media.

The potential outcomes of online bullying have been seen time and time again with several young Australians taking their own lives as a result of their online bullying. For example, what happened to young Dolly Everett at the hands of online bullies.

So the risk to Australians mental health and well being due to social media and the lack of response by platforms is huge, the outcomes could literally be death

by suicide and no one deserves that just for going on social media.

(II) Firstly FACAAs are only on Facebook, Instagram and tik tok so we can only speak to their specific algorithms. We will mainly be referring to Facebook's algorithms as we know those quite well.

In our opinion the algorithms do much more harm than good. All too often we see victims of online bullying being the ones punished by the platforms. For example, one FACAAs client sent us screen shots (available on request) of a large group of people from her high school calling her all sorts of names and telling her to kill herself or they would rape her next time she came to school.

Facebook gave her a 30-day ban for use of bad language and none of the offending comments were removed nor did any of them receive bans, despite their horrendous use of language and threats of violence.

Furthermore, the local police literally told us "kids will be kids and there's nothing we can do anyway because we don't have any way of proving it was the kids who wrote the offending comments".

Both responses were unacceptable however we had very little recourse against either.

The algorithm itself seems to be concerned with perceived violations of community standards, which in theory is fine however practically simply not working. A human is required to examine the validity of reports made and decide on an appropriate course of action because the algorithm is simply not working.

FACAAs have dozens of examples of the algorithm failing

not just in online bullying situations but also when it comes to people being able to use their names, people being able to get access to their business accounts, the list goes on and on.

In summary the algorithm is failing Facebook and needs to be replaced with a human response.

(III) Whatever identity verification and age assurance policies that do exist are far too easy to get around. There was not a single child respondent who did not have access to Facebook and Instagram through their own accounts under their own name. It is literally as simple as knowing how long ago 18 years was and clicking that box rather than their real age.

The identity verification algorithm is also an epic failure with the users having the ability to create multiple accounts one after the other and use them all at once from the same device to launch bullying attacks on individuals. Firstly there should be a limit on devices having multiple accounts, if you have had an account on that device that should be it, the ability to use multiple accounts literally gives people the power to bully and intimidate over social media with absolute ease.

In summary neither the identity verification nor the age verification policies used by Instagram or Facebook work.

*(C ) the effectiveness, take-up and impact of industry measures, including safety features, controls, protections and settings, to keep Australians, particularly children, safe online;*

The safety features and parental controls need to be improved on. For example if a comment you are typing violates or could violate the Facebook community



standards you are warned as such and if you post it you are fully aware if will probably be taken down. However, this only works if the account holder cares that the account could be banned. If they simply do not care (for example the account is a fake troll account) then there is literally nothing to stop them posting the comment even if it is harmful to the reader.

So once again while good in theory practically the process needs work. An easy fix would be to remove the posters ability to put the comment or send the inbox if it violates the community standards.

Age controls can be easily gotten around by simply changing the year of birth so those controls don't stop children getting on the platforms at all.

In summary once again the controls are very good in theory, however practically much more needs to be done to protect our children and vulnerable people.

*(D). the effectiveness and impact of industry measures to give parents the tools they need to make meaningful decisions to keep their children safe online;*

FACAA see a lack of transparency in these tools/industry measures. If your goal is to give parents ALL the information they need to make informed decisions in regards to social media platforms and their children, then you need statistics on things like reports made, reports actioned and reasons for the discrepancy. At FACAA we encourage our members to use the report functions and get told over and over again "the comment did not violate their community standards" despite the fact the comment was clearly a bullying comment. One example of this was

the comment made by an obvious fake troll account to one of our survivors on a survivors story post (a post which is as the name says a redacted version of a survivor's story to inspire other survivors to heal from their ordeals) The comment was (screenshots available on request)

“Wow you sure got F#\$ked, you deserved it being a filthy sand donkey Id kill myself if I were you”

This was on the FACAA page, it was instantly reported and blocked by us as page administrators and by several of our members. We were all absolutely shocked to get the feedback from Facebook of “Thank you for reporting this comment, we found it does not violate our community standards at this time”. There was even an option to say that we disagreed with the decision, this disagreement did not activate a human review of the decision, instead it apparently helped to improve their policies for which we were all thanked”

Now in this case the commentor was blocked from the page and their comment deleted, however all too often we see cyber bullying going on “friends” pages with the victim having no re-course what so ever because blocking the individuals simply leads to a mass tagging by others not yet blocked.

Another perfect example of reports made that were not actioned happened to me. I had a disagreement with a member who then went out and made fake pages with my photographs on them, photographs of my child, my place of work the list goes on.

This profile went around imitating me making horrendous comments, giving horrible reviews and even had one company threatening me with legal action (it was resolved when I told them what had actually happened). The profile

was reported to Facebook by me, by over 50 of my friends and members of the charity. Every single report was replied with “This page does not violate our community standards” despite the profile pictures clearly being me and the comments being highly offensive.

The reason I mention these two glaringly obvious examples of Facebook’s poor handling of reports, is because the statistics that parents need to read “Reports 100, actions taken 0” in these two examples alone.

If the social media companies really want parents to be able to make an informed decision, they would have statistics like this available, but they do not.

Another good statistic that would help parents make an informed decision is how many actual people are involved in the decision-making processes. For example, the social media streaming app UPLIVE, was quoted as saying they have no human moderators because they couldn’t afford them. Dozens of examples of child grooming were presented to UPLIVE via FACAA and other online child safe pages (screenshots available on request) to which they responded with “Uplive do not have the financial capabilities to have human moderators at this time, the examples you sent us clearly violate our terms and conditions and we will use them to help tweak our algorithm”.

As a parent this response is simply unacceptable, once again if the social media platforms want parents to be able to make an informed choice, they need to specifically state how many human moderators they use to manage child safety on their site and how many users each moderator is responsible for.

These are the statistics that parents really need to make informed choices as to a safe social media platform for

their children. Sadly none of the apps provide any of this information so it is our belief that none of them are safe for children.

*(E) The transparency and accountability required of social media platforms and online technology companies regarding online harms experienced by their Australian users;*

To summarise our above answer, social media platforms need to have complete transparency if they are to give a true indicator of potential harms that may occur on their platform then they need to show true statistics in regards to reports made and reports actioned, how many human moderators they have per users and also a true indicator of what dangers could be faced.

What ability do strangers have to reach out to my child ?

What can they potentially send to my child ?

What ability do strangers have to create new profiles if they are blocked ?

What anonymity do strangers have on the platform ?

None of the platforms currently address any of these questions.

*(F) The collection and use of relevant data by industry in a safe, private and secure manner;*

The current social media platforms collection of data is an absolute joke. The running joke is that you can not have a conversation without getting a Facebook ad and sadly that is not a joke.

The worry is the safety of this data, if you google having a medical condition then you are instantly bombarded with

adds for treatments for that condition. Where is the targeting data being stored ? Is it safe ? how much personal data are these social media platforms storing and where ?

These are questions that worry our clients at FACAA. We have survivors of child rape who have not disclosed to anyone who are being bombarded with targeted adds for psychological services, this left our clients triggered and paranoid as to just how much the app has stored on them and can anyone access it.

*(G) Actions being pursued by the Government to keep Australians safe online.*

The steps taken by the Australian government to keep Australians safe online have been getting better especially in the past 3 years. However there are some holes that need to be addressed immediately.

The major hole with the Online safety Act of 2021 is the fact that the incident of cyber bullying needs to first be reported to the social media platforms before going to the E- Safety commissioner.

As has been previously stated the social media platforms are either understaffed or too reliant on their algorithms to recognize threats to children's safety that need immediate attention and reporting to the social media platforms first adds additional precious time to the already time sensitive incident.

In an online emergency (for example threats of harm or risk of suicide) the E Safety commissioner's office needs to be able to act without the need for the incident to go to the social media platforms. In threats of harm for example

the perpetrators will not be making the threats using their own personal profiles as they understand it is a crime and will see them punished by the authorities. So, they use fake profiles which makes the police's abilities to act also limited. However, if the victim could go straight to the E Safety commissioner's office the real perpetrators could be found out and dealt with quickly before things escalate to a dangerous point.

The other major flaw in the current legislation is the rise of "self-made" child abuse images. Urgent legislation is required to make it a federal crime to encourage any child to make child abuse material. To do so needs to face the same charge as production of child abuse material at a federal level which is literally what it is, however under current legislation there is very little punishment for child abusers who groom and convince children to produce child abuse material.

Children who have been victim to groomers who have convinced them to produce child abuse material will grow up with the same anxieties and same fears as any child who has been a part of child abuse material. They will grow up never knowing if the person looking at them on the bus has seen their abuse material, they will always wonder if the person serving them at the shops has seen it, their fears and their anxieties are warranted because once a video or image is online, they can never be erased.

Why should these children not be able to seek justice for the crimes committed against them?

Urgent legislation needs to be passed to see that anyone caught encouraging a child to make child abuse material is prosecuted under the same laws as those who produce it themselves.



## **Conclusion**

---

FACAA would like to say we are encouraged by the recently passed legislation by the Australian government and the establishment of the E-safety commissioner's office.

FACAA would like to thank the house select committee on social media and online safety for the opportunity to make this submission. The world has changed, gone are the days of the predator lurking in the bushes at the local park. Now is the age of the online predator who grooms children from a far and commits their crimes without ever having been face to face with the victim-survivor.

The major recommendation from us is that the crime of encouraging a child to produce child abuse material becomes a federal one and has the same penalties as the crime of producing child abuse material. The victim-survivors face a life filled with the same anxiety and fear so why should the producer of that heinous material face any less of a charge just because they were not physically in the room when the material was being made.

A very big thank you and reference needs to go to the volunteers of the FACAA social media awareness campaign. TC Robinson, Genevieve Elliot, Kellie Roche, Chris Riddett. Without whom this submission would have never occurred.