

Submission to Internet Search Engine Services Online Safety Code Environment and Communications References Committee

Introduction

For the past 15 years we have extensively documented digitally-facilitated sexual exploitation, tech-facilitated gender based violence, trafficking, predation and grooming of children and their impacts on child protection, human rights, women's safety, civil society and public health.¹

We have published research on the role of pornography in fuelling attitudes that drive violence against women and girls. Young people often see pornography for the first time on social media. We led the call for proof of age protections as one barrier in the way of children being exposed to pornography. We spearheaded an open letter signed by 50 leading women's safety and child protection experts, calling on the Federal Government to reverse its decision against an age assurance pilot. We welcomed the trial findings in the recently released report.²

We have been part of an international campaign exposing Instagram as a predator's playground. Paedophile networks connect on social media. Platforms bring them together to trade images and connect with children. Children are served up to predators through Instagram's algorithms which curate sexual content for them.³

A member of our campaign team, Lyn Swanson Kennedy, who appeared on ABC Four Corners in May 2024⁴, has tracked thousands of Instagram predators active on the accounts

¹ Collective Shout (Jul 2024). Submission to Joint Select Committee on Social Media and Australian Society.

https://www.collectiveshout.org/joint_select_committee_on_social_media_and_australian_society

² (19 Sep 2023). Women's safety, child protection groups call on Gov to trial age verification porn protection for children. https://www.collectiveshout.org/open_letter_age_verification

³ <https://www.collectiveshout.org/tags/instagram>

⁴ Roper, Caitlin (25 May 2024). "We have failed these girls": Our campaigner Lyn Swanson Kennedy featured on ABC's Four Corners, Collective Shout.

https://www.collectiveshout.org/lyn_swanson_kennedy_on_abc_four_corners

of young girls. Her reports to the platform are ignored, as are our persistent calls to ban “parent-run” accounts which Meta permits as a caveat to its 13+ minimum user age terms.⁵

We have argued for some time that social media companies have failed to put the welfare of children and young people ahead of their own vested interests. As a result, with unfettered power and acting like rogue states, these wealthy corporations have engaged in social arson, created a poisonous ecosystem and predatory digital environment - especially for young people. (Please refer to our submission to the Joint Select Committee on Social Media and Australian Society, July 10, 2024 for more detail.)⁶

These Big Tech corporations have covered up their malign impact. They have not been forthcoming about the damage done, failed to implement safety-by-design and prioritised profits over safety. Their business model has been based on using toxic algorithms to hook children on addictive content and the ‘infinite scroll’. As Dr Elly Hanson observes:

Social media is built on manipulative algorithms - Meta have continued to turbocharge theirs - not only do these fuel numerous harms to children (and adults), at their heart they fundamentally undermine our very freedom and autonomy.⁷

Seven families in Europe have taken joint legal action against TikTok - a platform they blame for the suicide deaths and mental injuries of family members.⁸ Some viewed suicide instruction videos. Three took their lives, others survived attempts.

Recently NSW mum Emma Mason addressed the UN on how her daughter Tilly was bullied to death, with the bullying enabled by social media.⁹

As the tech giants fought the ban, Ms Mason in New York told world leaders about her daughter.

Ms Mason said that a fake nude photo of her daughter produced by a fellow student was “circulated on Snapchat, reaching at first five children, then 300 by 4pm and, by 6pm, over 3000 children.”

⁵Kennedy, L (22 Nov 2022). We reported 100 pieces of child exploitation content to Instagram - they removed just three, Collective Shout.

https://www.collectiveshout.org/100_reports_of_child_exploitation_instagram

⁶ Collective Shout (Jul 2024). Submission to Joint Select Committee on Social Media and Australian Society.

https://www.collectiveshout.org/joint_select_committee_on_social_media_and_australian_society

⁷ Hanson, E. (4 Sept 2025). Comment, LinkedIn.

https://www.linkedin.com/posts/molly-rose-foundation_newsnight-ugcPost-7368967100855377921-vhCO/

⁸ The Guardian (4 Nov 2024). French parents whose children took own lives sue TikTok over harmful content. *The Guardian*.

<https://www.theguardian.com/technology/2024/nov/04/french-families-sue-tiktok-exposure-harmful-content-suicide-self-harm-eating-disorders>

⁹ Kelly, J. and Yim, N. (26 Sep 2025). Mother’s tragic loss inspires EU leader. *The Australian*, p5.; Brook, B. (25 Sep 2025). ‘We’re watching’: World leader’s Aussie praise. News.

<https://www.news.com.au/technology/online/social/sydney-mums-hug-from-world-leader/news-story/79b3a167eacf4edd1ab547c1bd1244af>

“The reality of this harm was instant. Tilly was hysterical and spiralling...In a small rural community, this event was catastrophic for Tilly. She wouldn’t leave the house.” Addressing the new 16-year old age limit for social media accounts, Ms Mason said : “we’re the first country to do this...I implore leaders and nations of our great world to act, and act now...[the law] will improve lives. It will save lives.”¹⁰

Growing numbers of boys are at risk of sextortion. Almost all the sextortion scams targeting minors are enabled by Instagram. At least five Australian boys to date (that we know of) have ended their lives due to being tricked by sextortion scammers pretending to be ‘hot’ young women and blackmailing them after an exchange of nudes. Globally, this crime has led to at least 39 teen suicides in the past two years during which reports of financial sextortion targeting minors jumped 18,000 percent from 139 cases in 2021 to more than 26,000 reports in 2023.¹¹

Social media has consistently been linked to a decline in mental wellbeing for young people, particularly young women. Eating disorders have increased 200 percent over the last 12 years.¹² Research by the Center for Countering Digital Hate (CCDH) titled ‘Deadly By Design’ found TikTok pushes harmful content promoting eating disorders and self-harm into young users’ feeds. Within 2.6 minutes, TikTok recommended suicide content. Within 8 minutes TikTok served content relating to eating disorders.

CCDH researchers found a community for eating disorder content on the platform, amassing 13.2 billion views across 56 hashtags often designed to evade moderation. Rather than entertainment and safety, our findings reveal a toxic environment for TikTok’s youngest users, intensified for its most vulnerable.¹³

A total of 88 percent of Australian and New Zealand eating disorder clinicians support raising the age of social media access to 16.¹⁴

Large numbers of Australian girls are hospitalised for intentional self harm.¹⁵

¹⁰ Speers, D. (24 Sep 2025). Australia’s social media ban wins praise from Europe at UN event. *ABC News*.

https://www.abc.net.au/news/2025-09-25/united-nations-general-assembly-social-media-ban/105814246?utm_source=abc_news_web&utm_medium=content_shared&utm_campaign=abc_news_web

¹¹ Paul Raffile, Investigator, Linked In, July 9, 2024.

¹² Academy for Eating Disorders (2 Nov 2021). Urgent responsibility to reduce harms posed by social media on risk for eating disorders: An open letter to Facebook, Instagram, TikTok, and other global social media corporations.

<https://www.newswise.com/articles/urgent-responsibility-to-reduce-harms-posed-by-social-media-on-risk-for-eating-disorders>

¹³ Center for Countering Hate (15 Dec 2022). Deadly by Design: TikTok pushes harmful content promoting eating disorders and self-harm into users’ feeds.

https://counterhate.com/wp-content/uploads/2022/12/CCDH-Deadly-by-Design_120922.pdf

¹⁴ Australia & New Zealand Academy for Eating Disorders (2025). Let them be kids: Young Aussies’ eating disorders fuelled by social media, poll shows.

<https://anzaed.org.au/Web/Web/Our-Community/NewsArticles/Young-Aussie-s-eating-disorders-fuelled-by-social-media--poll-shows.aspx>

¹⁵ Australian Institute of Health and Welfare (2025). Suicide and intentional self-harm hospitalisations among young people.

At time of writing, an investigation by Global Witness found TikTok was suggesting sexually explicit search terms to 13 year olds, directing them to pornography content in an apparent breach of the UK Online Safety Act. "TikTok's search suggestions were highly sexualised for users who reported being 13 years old and had 'Restricted Mode' turned on...TikTok's search algorithms actively push minors towards pornographic content," the report states.

Content included "hardcore porn showing penetrative sex..the platform wasn't just showing such content to a minor, but actively directing them to it when the account user had zero previous search or watch history."

Social media platforms are also advertising AI chatbots to young people. New reports are emerging of adolescents developing harmful relationships with synthetic personas deceptively advertised as 'companions' and 'friends'.¹⁶ AI companies have been criticised for the chatbots they have created engaging in sexual conversations with young people.¹⁷

Rising use of AI chatbots is also leading to the emergence of 'AI psychosis', along with other forms of mental health damage and in extreme cases, suicide.¹⁸

We have never portrayed raising the age of access to social media as a silver bullet for online safety. However, we do not have the luxury of waiting for the Big Tech platforms to take effective action to protect young users. They have demonstrated a history of intransigence, not upholding even their own 'safety' standards, and reluctance to comply with various regulatory measures and codes of conduct.

Platforms need to be made to enforce their own Terms and Conditions. Where they fail, regulation should rein them in. We report to Instagram but there is too often no action - the platform doesn't respond to reports, rarely is content removed. The platform has enabled new ways of exploiting children.

Big Tech companies have failed to exercise Corporate Social Responsibility. Instead they have facilitated sexual exploitation, grooming and predation of children.

As Lyn Swanson Kennedy commented on Instagram:

imagine for a moment if for the years big tech bros - the richest, most well resourced and tech savvy corporates in the world - have had to stop predation, exploitation, sexualisation, abuse, grooming, trafficking, sextortion, contributions to body hatred,

<https://www.aihw.gov.au/suicide-self-harm-monitoring/population-groups/young-people/suicide-self-harm-young-people>

¹⁶ eSafety Commissioner (18 Feb 2025). AI chatbots and companions - risks to children and young people. Online Safety Advisory.

<https://www.esafety.gov.au/newsroom/blogs/ai-chatbots-and-companions-risks-to-children-and-young-people>

¹⁷ Edwards, C. (18 Aug 2025). Meta investigated over AI having 'sensual' chats with children. BBC News. <https://www.bbc.com/news/articles/c3dpmlvx1k2o>

¹⁸ Wei, M. (4 Sep 2025). The Emerging Problem of 'AI Psychosis'. Psychology Today. <https://www.psychologytoday.com/us/blog/urban-survival/202507/the-emerging-problem-of-ai-psychosis>; Andoh, E. (1 Oct 2025). Many teens are turning to AI chatbots for friendship and emotional support. American Psychological Association. *Monitor on Psychology*, 56(7). <https://www.apa.org/monitor/2025/10/technology-youth-friendships>

eating disorders, anxiety, declining teen mental health, suicide, “self generated” child exploitation material, image based abuse, exposure to pornography, literally serving little kids up to pedophiles via algos and aiding global networks of predatory men with sexual interest in children...that instead of kicking back, watching it all unfold and profiting, they actually pulled their fingers out and worked to stop it?¹⁹

But they didn't. Which is why raising the age of access to 16 has become necessary and why we supported the Government's move to achieve this through legislation. Just as we put restrictions - or 'bans' - on driving vehicles, drinking alcohol, or smoking cigarettes, this is a commonsense and overdue move.

Australians parents overwhelmingly agree that social media is not a suitable product for children: 77%, according to YouGov;²⁰ 61% according to Q&A;²¹ and 73% believe children are not safe on social media platforms, according to the University of New South Wales.²²

We contend, if some Australian MPs believe that real harm will be done to young people by restricting social media to age 16+, why have any age limits at all? Why not allow under 13s to open their own accounts?

Professor Michael Salter, Director of the Childlight East Asia and Pacific Hub at UNSW, states:

The social media ban has found wide support in the community for a reason. Parents are relieved that, finally, the government is taking definitive steps to protect children from a rapacious industry that has infiltrated every aspect of their lives. From my point of view, given the epidemic rates of online sexual abuse and exploitation, including organised crime groups targeting children for financial sexual extortion on an industrial scale, I don't see how we can let children onto these sites any more. The technology sector had 25 years to take child protection seriously and they failed. Time for government to act.²³

¹⁹ @LS_Swanson.Kennedy (27 Nov 2024), comment on @collectiveshout Instagram post. <https://www.instagram.com/p/DC28L5SvO6U/>

²⁰ YouGov (26 Nov 2024). Support for under-16 social media ban soars to 77% among Australians. <https://au.yougov.com/politics/articles/51000-support-for-under-16-social-media-ban-soars-to-77-among-australians>

²¹ Whittaker, J. (18 Aug 2024). License them, censor them and make them pay: What Australians really think about social media. ABC News. <https://www.abc.net.au/news/2024-08-19/social-media-polling-australians-back-regulation-age-limits/104233852>

²² UNSW Media (28 Apr 2025). Australians want action to protect children online: new poll. <https://www.unsw.edu.au/newsroom/news/2025/04/australians-want-action-to-protect-children-online-new-poll>

²³ https://www.linkedin.com/posts/michael-salter-335330161_australia-moves-to-ban-young-teens-from-social-activity-7260440868539531264-MxQV/

Social media's role in a rise of Harmful Sexual Behaviours in schools

Social media platforms have become tools of sexual harassment, and schools have become sites of abuse.²⁴ Based on engagements with thousands of girls, Movement Director Melinda Tankard Reist has documented routine sexual harassment in schools, with girls subjected to groaning and moaning noises and sexual gestures, touched, threatened with rape if they don't send nudes, sent unsolicited dick pics and had their bodies ranked and shared to Snapchat. She speaks to 13 year olds girls who tell her they are sent masturbation videos through SnapChat (Snap). Social media platforms enable and facilitate cyber flashing.

Given attempts to undermine the new laws to raise the age of access to social media to 16, we thought it worth summarising findings from a landmark report we published last year in partnership with parenting author and expert Maggie Dent for the benefit of Committee members.

Australian teachers have told us very clearly that social media has a malign influence on children. In our Sexual Harassment of Teachers [ShoT] research in 2024, with more than 1000 teachers responding, the influence of the internet and social media emerged as a dominant theme.²⁵

Many respondents drew a connection between increased sexual behaviours in schools and students' social media usage. Platforms such as TikTok and Instagram were often cited as having a major influence in shaping the unhealthy and often developmentally inappropriate sexual norms, behaviour and expectations observed among students. One teacher reported: "Social media is our number 1 behavioural issue at Year 7."

Teachers commented:

- "Social media appears to play a prolific part in this harmful behaviour...The links between social media and a myriad of social issues – bullying, youth suicide, sexual harassment, disordered eating, body shaming etc cannot be underestimated."
- "Social Media influence is frightening. Students are being exposed to sexualised content at a much younger age. I teach Year 3 and have had students who have referred to inappropriate behaviour without any inhibitions. There once was a time when this was not the case. Parents don't even seem to be aware of the content their children are exposed to."

²⁴ Tankard Reist, M. (11 Apr 2025). Behind the classroom door, sexual harassment is becoming routine. <https://melindatankardreist.com/2025/05/behind-the-classroom-door-sexual-harassment-is-becoming-routine/>; Tankard Reist, M. (6 Mar 2016). Growing Up In Pornland: Girls have had it with porn conditioned boys. *ABC Religion & Ethics*. <https://www.abc.net.au/religion/growing-up-in-pornland-girls-have-had-it-with-porn-conditioned-b/10097244>; Tankard Reist, M. (20 Jul 2022). When the moaning stops: How porn is damaging young people. *Eureka Street*. <https://www.eurekastreet.com.au/article/when-the-moaning-stops--how-porn-is-damaging-young-people>

²⁵ Mowle, A., Ewing, S. & Perry, T. (2024). Sexual Harassment of Teachers in Schools. Collective Shout. <https://www.collectiveshout.org/shot-report>

- “Social media and the internet have exposed boys to inappropriate sexualised content at a much younger age and it is sadly not monitored well by parents.”
- “Students copying social media sites re sexualised behaviours seem unaware of the impact on others.”
- “Sexualised behaviours are displayed in younger students, when discussed it comes with students the common thread becomes social media, music videos and electronic games.
- “Many teenagers seem to be engaging in more acts/suggestions of sexualized behaviour towards each other (not necessarily as part of a couple relationship) that has been normalized for them by their choices of social media/online browsing.”
- “Sexualising overt behaviour on social media may be making people less sensitive to what is appropriate.”
- “Social media is playing a huge role in corroding the quality of interactions and systematically undermining the attention of our young people. I believe there is an increasing disconnect between women as human beings and women as objects.”

1. Privacy and data protection implications of age verification

We refer Committee members to the findings of the Age Assurance Technology Trial Final Report.²⁶ The first of its kind in the world, key findings in regard to privacy preservation are summarised:

The Trial offered a locally grounded, globally informed assessment of how age assurance technologies could be implemented in Australia in a way that is proportionate, privacy-respecting and inclusive of all users.

Age assurance can be done in Australia - our analysis of age assurance systems in the context of Australia demonstrates how they can be private, robust and effective. There is a plethora of choice available for providers of age-restricted goods, content, services, venues or spaces to select the most appropriate systems for their use case with reference to emerging international standards for age assurance.

Our evaluation did not reveal any substantial technological limitations that would prevent age assurance systems being used in response to age-related eligibility requirements established by policy makers. We identified careful, critical thinking by providers on the development and deployment of age assurance systems, considering efficacy, privacy, data and security concerns.

We found robust understanding of and internal policy decisions regarding the handling of personal information by Trial participants. The privacy policies and practice statements collated to privacy by design principles, with consideration of what data was to be collected, stored, shared and then disposed of.

²⁶ Age Check Certification Scheme (Aug 2025). Age Assurance Technology Trial <https://ageassurance.com.au/report/>

In protecting children, the legislation features stronger than typical data protection requirements. Companies will be required to ring-fence to destroy data collected for age assurance once the age check is complete. The Government has previously stated a digital ID framework was not in scope and would not be used for age assurance.

To those using 'privacy' arguments to undermine the new measures, we ask the question: whose privacy is being protected and who are we prioritising? The groups most opposed to these measures - and who have a record of opposing any online regulation - are mostly not those with child safeguarding at the forefront of their lobbying.

Lyn Swanson Kennedy commented at the time the social media age of access Bill was being debated:

..It is the pro pedophilia groups, child predators + pornographers [who] oppose the Bill..imagine why. "Privacy" is their Trojan horse. Meanwhile experts at the coalface of fighting child exploitation support it...²⁷

2. The expansion of corporate data collection and user profiling capabilities enabled by code compliance requirements

The depth of corporate data collection, user profiling, and violations of privacy by companies over the last few years has been documented. Pornhub is well known to collect extensive data on its customers, as discovered by investigative journalist Meineck in 2019, and leaks user data to third parties.²⁸

Large social media and video streaming companies were found by the US Federal Trade Commission (FTC) to be engaging in vast surveillance of users, with few privacy controls, and inadequate safeguards for kids and teens:²⁹ Twitch; Facebook, YouTube, Twitter, Snap, TikTok, Discord, Reddit, and Whatsapp.

Based on the data collected, the staff report said many companies assert that there are no children on their platforms because their services were not directed to children or did not allow children to create accounts. The staff report noted that this was an apparent attempt to avoid liability under the Children's Online Privacy Protection Act

²⁷ @LS_Swanson.Kennedy (27 Nov 2024), comment on @colectiveshout Instagram post

²⁸ Meineck, S. (5 Sep 2019). Here's how much Pornhub knows about you. *Vice*.

<https://www.vice.com/en/article/pornhub-xhamster-data-about-you/>; Maris, E., Libert, T. and Henrichsen, J. (Nov 2020). Tracking sex: The implications of widespread sexual data leakage and tracking on porn websites. *New Media & Society*. 22(11).

<https://doi.org/10.1177/1461444820924632>

²⁹ Federal Trade Commission (19 Sep 2024). FTC Staff Report Finds Large Social Media and Video Streaming Companies Have Engaged in Vast Surveillance of Users with Lax Privacy Controls and Inadequate Safeguards for Kids and Teens.

<https://www.ftc.gov/news-events/news/press-releases/2024/09/ftc-staff-report-finds-large-social-media-video-streaming-companies-have-engaged-vast-surveillance>

Rule. The staff report found that the social media and video streaming services often treated teens the same as adult users, with most companies allowing teens on their platforms with no account restrictions.

The FTC also sued social media companies for collecting and using children’s information without consent.³⁰

ByteDance and its related companies allegedly were aware of the need to comply with the COPPA Rule and the 2019 consent order and knew about TikTok’s compliance failures that put children’s data and privacy at risk. Instead of complying, ByteDance and TikTok spent years knowingly allowing millions of children under 13 on their platform designated for users 13 years and older in violation of COPPA, according to the complaint.

As of 2020, TikTok had a policy of maintaining accounts of children that it knew were under 13 unless the child made an explicit admission of age and other rigid conditions were met, according to the complaint. TikTok human reviewers allegedly spent an average of only five to seven seconds reviewing each account to make their determination of whether the account belonged to a child.

The company allegedly continued to collect personal data from these underage users, including data that enabled TikTok to target advertising to them—without notifying their parents and obtaining their consent as required by the COPPA Rule. Even after it reportedly changed its policy not to require an explicit admission of age, TikTok still continued to unlawfully maintain and use personal information of children, according to the complaint.

3. The technical implementation and efficacy of age verification and content filtering mechanisms

According to the regulatory framework around the Social Media Minimum Age legislation, age restricted social media platforms must remove accounts of children under age 16. The platform must prevent children from creating accounts on those platforms. The necessary technology is available right now. It has been extensively and thoroughly tested in Australia, with a snapshot of the industry as it is now. From the Age Assurance Technology Trial (AATT) Report, September 2025:³¹

- Age verification can be done in Australia privately, efficiently and effectively.
- No substantial technological limitations preventing its implementation in the Australian context
- Providers’ claims were independently assessed; are accurate and reflective of real-world system performance.

³⁰ Ibid.

³¹ Age Check Certification Scheme (2025).

- There is no single solution to age verification; a range of valid models exist, shaped by different contexts, needs and expectations.
- The age verification sector in Australia is dynamic and innovative with active development and communication of verified age information.
- The team found robust, privacy-focused and secure data handling practices.
- Age systems performed broadly consistently across demographic groups, including Indigenous populations.
- Opportunities exist to enhance risk management and system capability, especially regarding real-time detection of lost or stolen documents.
- Cybersecurity practices were strong across the sector with various threats addressed; continuous monitoring remains essential.

4. Alternative technical approaches to online safety for all users, including young people

Given the history of failure of Social Media platforms to protect children, we do not believe there are alternatives to the new laws. We do, however, believe there are additional measures that could be taken.

The issue goes beyond an education problem. It is a design problem. Social media platforms are inherently harmful and dangerous for children. This legislation is simply enforcing corporate social responsibility and preventing harmful products from being sold to children. Children must not be able to enter into business contracts with these companies (also known as Terms and Conditions).

We support a Digital Duty of Care to place a legal obligation on digital platforms to take proactive steps to protect all users, not just children.³² We support the concept of safety by design.³³ We have lobbied for stronger penalties for any digital services putting children at risk. We welcome new industry codes, though will keep expectations low as to how industry implements and action them.

But we also strongly support this legislation to protect children from the irrefutable and specific harms of social media.

³² Collective Shout (7 Mar 2025). Submission on the impacts of harmful pornography on mental, emotional and physical health. <https://www.collectiveshout.org/submission-impacts-pornography-nsw>; Collective Shout (25 Nov 2024). Submission to Consolidated Industry Codes of Practice for the Online Industry.

https://www.collectiveshout.org/submission_to_consolidated_industry_codes_of_practice_for_the_online_industry

³³ Collective Shout (9 Mar 2024). Submission: Amendment to the Online Safety (Basic Online Safety Expectations) Determination 2023.

https://www.collectiveshout.org/amendment_to_the_online_safety_base

Parental Controls

Relying on parents to manage their children's use of social media is a naive proposal, given the corporate giants that parents are up against.

For example, the FTC alleged in 2023 that TikTok:

"... made it difficult for parents to request that their child's accounts be deleted. When parents managed to navigate the multiple steps required to submit a deletion request, TikTok often failed to comply with those requests.

TikTok also imposed unnecessary and duplicative hurdles for parents seeking to have their children's data deleted. That practice allegedly continued even after the executive responsible for child safety issues told TikTok's then-CEO, "we already have all the info that's needed" to delete a child's data when a parent requests it, yet TikTok would not delete it unless the parent fills out a second, duplicative form."³⁴

It was also alleged that TikTok failed to:

- notify parents about all of the personal data they were collecting from children;
- obtain parental consent for the collection and use of that data;
- limit the collection, use, and disclosure of children's personal information; and
- delete children's personal information when requested by parents or when it was no longer needed.

A just released report titled *Meta's Teen Accounts fail safety tests: report*, led by the Molly Rose Foundation in partnership with other child safeguarding organisations, published research highlighting systemic failures in Meta's Teen Accounts. A comprehensive safety testing programme found that 2 in 3 of Meta's safety tools are either substantially ineffective or no longer exist. Only 1 in 5 work as described.

Chief Executive of Molly Rose Foundation, Andy Burrows writes: "This must be a wake-up call to governments, regulators and parents. The evidence is clear: Teen Accounts are the performative stunt we feared, not a serious attempt to make teens safer online."³⁵

³⁴ Federal Trade Commission (2 Aug 2024). FTC investigation leads to lawsuit against TikTok and ByteDance for flagrantly violating children's privacy law. <https://www.ftc.gov/news-events/news/press-releases/2024/08/ftc-investigation-leads-lawsuit-against-tiktok-bytedance-flagrantly-violating-childrens-privacy-law>

³⁵ Molly Rose Foundation (25 September 2025). Instagram Teen Accounts fail to protect children, first-of-its-kind testing of safety tools reveals. <https://mollyrosefoundation.org/instagram-teen-accounts-fail-to-protect-children-first-of-its-kind>

The Age Assurance Technology Trial Report revealed serious weaknesses of parental controls as a form of age assurance and recommends that parental controls be viewed only as an adjunct to more direct and explicit forms of age assurance, in a layered model:³⁶

- Reliance on parental controls fails children who are not in a safe, family-led environment – in the summary, the report says that “inclusivity and accessibility require ongoing attention.”
- Situations like shared guardianship, independent adolescents, or care-based family structures do not work well for parental controls.
- It relies on parent access to the child’s device which does not reflect many children’s lived experiences.
- It does not recognise intergenerational or community-based caregiving structures found in some Aboriginal and Torres Strait Islander peoples contexts. The report notes that these challenges are acknowledged and providers are making efforts to improve accessibility.
- Caregivers must be engaged and motivated and educated in digital technology.
- The report notes that parents/guardians may misrepresent their child’s age (accidentally or purposefully), may lack understanding of the system or the implications, or may be under pressure from society, family, or other people to give access to age-inappropriate spaces online.
- With typical households including multiple devices like phones, tablets, streaming platforms, gaming consoles, smart TVs or education platforms, applying parental controls is difficult especially for time-poor, multilingual, or less digitally confident parents.
- Note that truly effective parental control would require formal verification with proof of guardianship or legal status, and almost all parental controls did not have this feature.
- An additional problem is that some parental control systems generate extensive child behavioural profiles, and security of these systems might be an issue.

AATT Stakeholder Advisory Board Chair and former child sexual abuse investigator Jon Rouse said any reliance on platforms to protect children from exposure to online harm had “epically failed” and that harm was accelerating rapidly, requiring a strong response.³⁷

[-testing-of-safety-tools-reveals/](#) See also: Teen Accounts, Broken Promises: How Instagram is Failing Minors <https://mollyrosefoundation.org/wp-content/uploads/2025/09/Teen-Accounts-Broken-Promises-How-Instagram-is-failing-to-protect-minors.pdf>; Andy Burrows on LinkedIn (25 Sep 2025). https://www.linkedin.com/posts/andy-burrows-60256731_metafailsteens-activity-7376918757249544192-vAV6

³⁶ Age Check Certification Scheme (2025).

³⁷ Collective Shout (20 Jun 2025). Media Release: Age Assurance Tech Trial: Preliminary results who promise in child protection and safety. Collective Shout. <https://www.collectiveshout.org/age-assurance-trial-preliminary-findings>

5. Appropriate oversight mechanisms for online safety codes

The eSafety Commissioner has called on the industry to shape up. New online safety codes have been launched. In our view the Commissioner is best placed to oversee implementation of the codes. We will also continue to highlight flaws in the system as we find them and call for stronger regulation and penalties for non-compliance in a sector which has shown extreme disregard for the wellbeing of young people and of community standards in the past.

6. Global experience and best practice

Australia has taken the lead in online safety for children.³⁸ While there is much that remains to be done, as demonstrated at the UN recently, European leaders expressed a desire to follow our example in regards to social media age of access laws.

American Jonathan Haidt, Professor in Ethical Leadership and author, commended Australia's determination and efforts to protect children from social media harms, urging that reform will not arise out of the United States, or the platforms themselves:³⁹

"American tech companies created most of the internet in the 1990s. We were all so excited about it that our Congress passed two terrible laws to help the internet grow without any guard rails," he said.

"Now, three giant companies compete fiercely over every minute of our children's waking consciousness — Meta, Snap and ByteDance.

"We created monsters. We need you to slay them, or at least tame them.."

"The fact that these platforms put kids in contact with strangers who are trying to get them to do things, and who are sometimes trying to reach them for sex — this is just madness that we allow this," he said.

³⁸ Speers, D. (24 Sep 2025). Australia's social media ban wins praise from Europe at UN event. *ABC News*.

https://www.abc.net.au/news/2025-09-25/united-nations-general-assembly-social-media-ban/105814246?utm_source=abc_news_web&utm_medium=content_shared&utm_campaign=abc_news_web

³⁹ Keane, Daniel and Hayne, Imogen (11 Oct 2024). Social media driving 'greatest destruction of human potential' since World War II, American author tells Australian summit. *ABC News*.

<https://www.abc.net.au/news/2024-10-11/social-media-summit-told-of-need-for-global-crackdown/104459420>

"If Australia and the UK and the EU all commit to implementing a minimum age in the next few years, the companies will have to act," he said.

"They will never do it if not forced to. We need to force them. We need to free kids from these traps by raising the age for opening social media to 16."

Professor Haidt warns that the "current ease of exposure to graphically violent, sexual and predatory content was driving adverse outcomes in education, mental health and physical wellbeing".

A number of countries and US states have implemented age verification/age assurance to protect children from pornography, or requirements for parental consent for under 13s using social media, or other kinds of default protections for minors.

Instead of raising the age of access, the UK Government took an alternative approach, opting for a two-strand approach to children's online safety, on the one hand demanding age verification for pornography and on the other, bringing in a convoluted and inadequate range of regulations on social media - asking for content moderation, self-assessment (marking their own homework) and a 'whack-a-mole' approach' dealing with problems when civil society or parents and children draw attention to individual problems. These regulations have not addressed the root cause of the parasitic algorithms and as a result, despite the Online Safety Act being fully implemented, children continue to be served toxic and harmful content.⁴⁰ Under resourced civil society organisations shoulder the burden and do the bulk of the work in identifying and challenging the underlying problems. UK partner organisations have told us they wished their country had followed the path Australia has taken.⁴¹

7 Any other related matters

We are in favour of including YouTube in social media restrictions for under 16s. YouTube is one of the Social Media platforms being sued by 41 US states in a multidistrict litigation, alleging that several social media companies - including YouTube, Meta, Snap, and TikTok - designed their platforms to foster compulsive use by minors, resulting in harm to children and the public health.

We also support the eSafety Commissioner's call to 16 other platforms to make the case for why they should not be included, including WhatsApp, Reddit, Discord, Roblox and Steam.⁴² Given the risk profiles of these platforms, we believe they should definitely be included in the age-of-access measures. We have commented on some of the 16 platforms named by the Commissioner below:

⁴⁰ Crawford, A. (2 Oct 2025). TikTok recommends porn to children, says report. *BBC*.
<https://www.bbc.com/news/articles/c708v7qkeg1o>

⁴¹ Personal communications, Dr Elly Hanson, Strategic Director, CEASE UK (October 2025).

⁴² Lavoipierre, A. (23 Sep 2025). Legal fights are brewing over which online social platforms will have to ban under-16s. *ABC News*.
https://www.abc.net.au/news/2025-09-24/digital-dilemma-social-media-age-ban-platforms/105807302?utm_source=abc_news_web&utm_medium=content_shared&utm_campaign=abc_news_web

Roblox

A major report published by Hindenburg Research on popular social gaming platform, Roblox, “revealed an X-rated pedophile hellscape, exposing children to grooming, pornography, violent content, and extremely abusive speech”.⁴³ Their research revealed dozens of groups with thousands of members “openly soliciting sexual favors and trading child pornography.”

Since September 2025, third-party moderator *Moderation for Dummies* has identified over 80,000 accounts engaged in erotic roleplay games on Roblox⁴⁴. The National Center on Sexual Exploitation described Roblox as “a tool for sexual predators”.⁴⁵ A former senior product designer at Roblox is quoted saying, “If you’re limiting users’ engagement, it’s hurting your metrics... in a lot of cases, the leadership doesn’t want that.” More than 40% of Roblox users are preteens⁴⁶.

Discord

Discord enables the grooming, abuse and sextortion of children and young people. An evidence brief compiled by the National Center on Sexual Exploitation states that “Discord has facilitated a space for sexual grooming by abusers or sex traffickers, leaving it anything but a safe and friendly place for minors”⁴⁷.

Reports of child sexual abuse material on the platform increased by 474% between 2021 to 2022⁴⁸. A lawsuit against Roblox and Discord accuses the companies of “recklessly and deceptively operating their business in a way that led to the sexual exploitation and suicide” of a 12-year-old boy⁴⁹.

⁴³ Hindenburg Research (8 Oct 2024). Roblox: Inflated Key Metrics For Wall Street And A Pedophile Hellscape For Kids. <https://hindenburgresearch.com/roblox/>

⁴⁴ @modfordummies on X (24 Sep 2025). <https://x.com/ModForDummies/status/1970626344649412813>

⁴⁵ Tuason, John (11 Jul 2024). Roblox: A Tool for Sexual Predators, A Threat for Children's Safety, National Center On Sexual Exploitation (NCOSE). <https://endsexualexploitation.org/articles/roblox-a-tool-for-sexual-predators-a-threat-for-childrens-safety/>

⁴⁶ Carville, Olivia and D’Anastasio, Cecilia (22 Jul 2024). Roblox’s Pedophile Problem, Bloomberg. <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>

⁴⁷ NCOSE (Mar 2022). Sexual Grooming of Minors on Discord. https://endsexualexploitation.org/wp-content/uploads/Sexual-Grooming-on-Discord_DDL2022_Proof.pdf

⁴⁸ Goggin, Ben (21 Jun 2023). Child predators are using Discord, a popular app among teens, for sextortion and abductions. NBC News, <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>

⁴⁹ Lenthang, Marlen and Mullen, Austin (14 Sep 2025). Roblox, Discord sued after 15-year-old boy was allegedly groomed online before he died by suicide. NBC News,

In 2018, a 36-year-old Canadian man groomed a vulnerable 14-year-old Australian girl over Discord, flying out to her home city to meet her and taking her to his accommodation, committing “indecent acts” against her.⁵⁰ This is just one of many examples that are reported - described as the “tip of the iceberg” by the Canadian Centre for Child Protection⁵¹.

Movement Director Melinda Tankard Reist has heard in schools of underage boys sharing gore material, pornography, Child Sexual Exploitation Material, rape memes and cruel commentary regarding actual rape cases of minor female peers including in a case which was before courts.

Steam

We strongly support including Steam in the new measures. We initiated a campaign against the platform for hosting rape, incest and sexual torture games. We argued gamified rape and incest simulation games contributed to real-life violence against women and girls by normalising and eroticising violence.⁵² While our team are all adult women, the response of platforms to our multiple reports of rape and death threats, online sexual harassment, deepfake image based sexual abuse, being sent pornography, being turned into pornography, depicted murdered, tortured, hung by nooses and our faces blown off, is instructive for their lack of care for the impact of the Tech Facilitated Gender Based Violence they enable and broadcast.⁵³

Conclusion

Mega corporations have facilitated and enabled predatory and grooming behaviours, sexualisation, and sexual harassment directed at minors. Platforms most popular with young people have served as gateways to pornography. They are commercially mediating the abuse of children and have failed to be accountable or transparent about this.

We acknowledge that these measures won't make platforms safe. But they will delay the age at which harm begins and allow for more cognitive development, protective interventions and life-enhancing activities in the interim which will mitigate some of the worst harms. As

<https://www.nbcnews.com/news/us-news/roblox-discord-sued-15-year-old-boy-was-allegedly-groomed-online-died-rcna231049>

⁵⁰ Trigger, Rebecca (19 Feb 22). Warning to parents over Discord chat after Canadian travels to Australia to abuse 14-year-old. ABC News,

<https://www.abc.net.au/news/2022-02-19/discord-chat-warning-after-canadian-groomed-australian-girl/100843882>

⁵¹ Goggin, B. (21 Jun 2023). Child predators are using Discord, a popular app among teens, for sextortion and abductions. *NBC News*.

<https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>

⁵² See campaign history here: https://www.collectiveshout.org/steam_campaign_history

⁵³ Roper, C. (22 Jul 2025). “You deserve rape”: We won't be silenced by gamers' threats and abuse. *Collective Shout*. <https://www.collectiveshout.org/gamers-threats-and-abuse>

Melinda Tankard Reist told the House Select Committee Inquiry into Social Media and Online Safety (July 10, 2024):⁵⁴

This is one lever, we need to use every lever at our disposal... let's try everything, throw everything we can at this to limit the damage that is being done, especially to vulnerable children and young people... Too much responsibility is placed on young people to monitor their own safety online and that onus should be on big tech and social media companies.

Children should not be required to build capacity. We agree with The Law Council of Australia that too much responsibility is placed on young people to monitor their own safety online and that the onus should be put on Big Tech and social media companies.⁵⁵

As Kirra Pendergast of Safe on Socials and Founder of Control + Shift states: this is “a systems change, not a gesture”.

Platforms must use the most reasonable, proportionate, and privacy-aware combination of tools for their service.

*This framework forces the tech industry to move from rhetoric to infrastructure. Platforms will have to: Build real detection systems; Prove they're effective; Respect privacy in the process; Continuously adapt as technology and risks evolve.*⁵⁶

We recommend the introduction of a statutory Duty of Care for all digital services, including the Best Interests of the Child as a primary consideration for design and delivery of services at every level.

The best interests of children must be a primary factor in all actions concerning children, including the development and provision of digital services.

The Australian Government should call on social media platforms to establish properly resourced trust and safety teams with publicly available information on how to contact them. These teams should also be required to report regularly on proactive and reactive responses to child exploitation activity detected and reported on their platforms. These reports should include details of outcomes including removal of content and users, and mandatory reporting to authorities.

⁵⁴ Tankard Reist, M. (10 Jul 2024). Evidence given to Joint Select Committee on Social Media and Australian Society. *Parliament of Australia*. https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=committees/commjnt/28205/&sid=0003; Roper, C. (13 Jul 2024). Hold social media platforms to account: MTR addresses Fed inquiry. *Collective Shout*. https://www.collectiveshout.org/mtr_addresses_social_media_age_verification_inquiry

⁵⁵ Richard, D. (2 Jul 2024). *Statutory Review of the Online Safety Act 2021*. Law Council of Australia. <https://lawcouncil.au/publicassets/a852a953-d038-ef11-94a3-005056be13b5/4550%20-%20S%20-%20Statutory%20Review%20of%20the%20Online%20Safety%20Act.pdf>

⁵⁶ Pendergast, Kirra (Sep 2025) on *LinkedIn*. https://www.linkedin.com/posts/kirra-pendergast-2938361_the-australian-minimum-age-regulatory-framework-activity-7375763466613092352-BuxL/

Age verification obligations incentivise the technology sector to invest in age assurance technology and other child protection measures.

Reputational risk is not a sufficient incentive for platforms to authentically operate in the public interest. It hasn't worked so far.

To quote Reset Australia:

*Australia is still largely reliant on a hopeful but outdated desire for industry-led and largely self-regulated processes. Harm happens as governments wait for self-regulation and co-regulation to fail.*⁵⁷

It is disappointing to witness those who should be on the side of children and vulnerable young people lining up on the side of Big Tech in a last minute bid to stymie social media age-of-access reforms. It is also disconcerting to see the Coalition support this inquiry, given it originally backed the measures in bipartisan agreement with the Federal Government. Running interference is just what the industry wants, noting the large sums of money the social media companies are investing in PR campaigns to tell us of all the amazing benefits they claim to deliver to young people. This is a classic technique from the well thumbed playbook of high-harm industries.⁵⁸

We urge the Government to stay the course and not be swayed by those with vested interests who place profit before the wellbeing of young people.

Collective Shout
October 6, 2025

⁵⁷ Reset Australia (Apr 2024). *Digital Platform Regulation Green Paper*. Reset Australia. <https://au.reset.tech/uploads/Digital-Platform-Regulation-Green-Paper.pdf>

⁵⁸ Petticrew, M., Katikireddi, S. V., Knai C. et al. (17 Oct 2017). 'Nothing can be done until everything is done': the use of complexity arguments by food, beverage, alcohol and gambling industries. *J Epidemiol Community Health* 71:1078-1083. <https://jech.bmj.com/content/71/11/1078.info>