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WORKING TO END CHILD EXPLOITATION

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Submission by Project Paradigm, IFYS to the Joint Select Committee on Social Media and Australian Society.

Project Paradigm welcomes this opportunity to make a submission to the Joint Select Committee on Social Media and Australian Society. Please note that this submission is set foundationally alongside UN The Convention on the Rights of the Child. We provide commentary in reference to the following terms of reference.

- (a) the use of age verification to protect Australian children from social media.
- (e) other issues in relation to harmful or illegal content disseminated over social media, including scams, age-restricted content, child sexual abuse and violent extremist material; and
- (f) any related matters.

Background

IFYS had its inception as a youth shelter on the Sunshine Coast over 40 years ago. Much of the focus of its work in the early days was aimed at addressing what was referred to at the time as 'opportunistic prostitution' or 'child prostitution'. In the early



1990's the organisation was one of only 5 agencies state-wide, funded to provide detached outreach services to young people at risk across the Sunshine Coast region.

Today IFYS has a service footprint that covers from the Gold Coast in the South to the far North of Queensland as well as involvement in a number of national initiatives aimed at addressing child sexual abuse and exploitation. The organisation delivers a range of specialist support and intervention programmes for children, young people and families.

Our vision is a national community that acknowledges, understands and values childhood by committing to the protection of children and young people through collaboration, advocacy and support.

Nationally, through our Project Paradigm Programme, we are focusing on prevention and intervention for children and young people at risk of or experiencing child exploitation by:

1. Building the capacity of frontline professionals and communities to be able to identify and respond appropriately to child exploitation through the development and provision of training and resources.
2. Contributing to the broader community of practice through research and advocacy activities.
3. Collaborating with stakeholders to achieve best outcomes for children and young people at risk of or experiencing child exploitation.

Fundamentally, our stance is one of ensuring that the best interests of the child is the primary consideration in **all** decisions captured within the proposed actions of the Joint Committee on Social Media and Australian Society.

Australia ratified The UN Convention on the Rights of the Child in December 1990, committing to ensure that **all** children in Australia enjoy the rights set out in the treaty. These rights recognise children and young people are unique and as such entitled to



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additional rights which recognise their specific needs to help them to thrive and develop their full potential. Special protection is afforded because of broad acknowledgment regarding their vulnerability to exploitation and abuse.

Social media definition

Social media refers to any online social network. An online social network is a website or app that allows a user to create and share content online, for example, Facebook, Twitter or LinkedIn.

(OAIC, 2024)

Social media consumption

This generation will be the first generation to be born into a digital age, with most children and young people using the internet on a regular basis to learn, make and maintain social connections and have fun. Online engagement is now an integral aspect of Australian culture with research reflecting that 25.21 million of all Australians have internet access (Healy, 2024), and children as young as 7 and a half years owning a smartphone with internet accessibility (Finder, 2021).

Cyberbullying, online pornography, sexting and sending nudes, being contacted by a stranger, being sent inappropriate content, being deliberately excluded from events and social groups, online threats or abuse, having personal information/data taken and misused have all been reported online by children and young people.

Whilst negative discourses are ubiquitous, the digital space can have many benefits to children's development particularly for exploring creativity, self-expression, education, community awareness, environmental activism and offers a range of opportunities that could be considered protective for their mental health.

During the COVID-19 pandemic, Australians' overall use of digital technology accelerated with families becoming reliant on digital screen technologies to cope



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with extended lockdowns, home schooling, entertainment, connecting with family and friends, and to avoid boredom.

Many Australian teachers and principals believe that online technology has enhanced kindergarten to year 12 content delivery, aggregation, student engagement, assessment and student management and wellbeing. Technology allowing students and teachers to connect and collaborate in ways that were previously only possible with face-to-face.

- 43% of Australian teachers and principals believe digital technologies enhance their teaching and learning activities.
- 60% of teachers believe technology has positively impacted the learning experience for students with disabilities (Gonski Institute for Education, 2020).

Research conducted by the University of Sydney (2023) involving 1200 young people found that young people use a wide array of social apps, and online games, especially TikTok, Instagram, YouTube, SnapChat, Minecraft, and Fortnite. Over 75 percent of young people indicated that they have used YouTube or Instagram. Nearly 70 percent have used TikTok or SnapChat. Typically, they first joined Instagram and SnapChat in late primary school — with or without their parents' permission as current age limits across platforms are set at 13 years of age.

More than half of Australian parents with teens report that social media is their top concern when it comes to their child's wellbeing but Jackie Hallan, interim chief executive of ReachOut says there is a wide disconnect between the concerns of parents and their children. Many young adults are mostly more tech savvy and more capable of using their devices as tools for good than they're given credit for. Social media use ranked 24th below concerns about study, their future, finances and cost of living pressures and mental health (Oong & Kelly, 2024).

Professor Pasi Sahlberg stated that, "Parents think that digital media and technologies have a dual power of offering children both benefits and drawbacks,"



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acknowledging that parents find technologies useful in staying connected with their children but difficult to control (Graham & Sahlberg, 2021).

(a) Age verification

Recent discussions regarding age-based verifications are centring on increasing the age limits for social media platforms to 16 years of age. Many online sites currently rely on age-gating, asking users to self-report their age. Naturally this is easily circumvented. Additional measures include verified parental consent and the implementation of age verification technologies that scan or use behavioural data which in turn raises concerns around privacy and the handling of personal data.

The recent discussions regarding age verification seeking to restrict children from accessing social media through age verification, the eSafety Commissioner states it “implies social media is a discrete form of media that can be separated from the rest of the internet and modern media.” It’s imperative to reiterate that the two are to be treated and understood as two parts of the same whole (Taylor, 2024).

If age-based restrictions are imposed, the eSafety Commissioner has openly expressed concerns that some young people will access social media in secrecy. This may increase the likelihood of their exposure to serious risks (Taylor, 2024).

As discussed, social media platforms do provide vital pathways for young people to engage with peers and seek information for school, work and personal needs, by enacting age-related bans and other restrictions across the board, without discretion or consideration for individual maturity, children’s right to access information will also be curtailed, a right enshrined in the United Nations Convention on the Rights of the Child.

Smartphone apps that support mental health are a financially viable, convenient and accessible way for children and young people to get support who have budget, time and other restrictions. Research undertaken by Headspace found that nationally, during COVID-19 lockdown or when some areas were emerging from a period of



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lockdown, one in three Australian young people reported high to very high rates of psychological distress and 15 % experience depressive symptoms. Consequently, many support services launched commercial mental health apps in response, that offer various features including mood tracking, journaling, psychoeducation, strategies, deep breathing, and mindfulness to name a few. The popularity of e-mental health care is particularly attractive to children and young people who are drawn in by the addition of game-like mechanics to mental health apps, because it made the app feel intuitive and interactive, and allowed for personalisation.

"Gamification, including social games in social groups, has become the most effective ways of delivering all sorts of services, including self-help services online," Professor Hickie said.

He said the increase in young people accessing help via their phones is because it's available, convenient, cost effective and private (Collis, 2020).

Yourtown in partnership with Swinburne University explored coping strategies of young Australian males aged 12-18 years and found that when young males were not feeling their best, they engaged in a range of activities with 48% playing games online with others and 40% using social media. (Yourtown, 2022)

Blanket banning across social media also fails to support necessary dialogue needed between parents and carers and their children regarding online safety. The interim chief executive at ReachOut, Jackie Hallan states, "Many parents and carers are wary about the possible harms from children and young people engaging in the digital world. Parents had four key concerns in the area: the amount of time young people were spending on social media, the safety of platforms, the limited parental controls and the type of content that the young people were accessing. Many parents underestimate the prevalence of children's negative online experiences, and many are not aware of their teens' exposure to negative content or sexual material online." (May,2024).

Research undertaken by the Australian Centre to Counter Child Exploitation found;



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- 3 per cent of the parents and carers involved in their survey listed online grooming as a concern.
- 52 per cent of participants talk to their children about online safety.
- 23 per cent of parents sit with their children while they use the internet.
- 51 per cent of participants did not know what they could do to keep children safe from online child sexual exploitation (ACCCE, 2018).

These findings highlight that current preventative measures are reactive and inconsistent, and there is a strong need to provide effective education and awareness materials to families.

Simply banning access fails to teach children and young people about how to have a healthy relationship with technology, something that the Australian adult population struggles significantly with. Our all-consuming relationships with smart phones has seen the emergence of Problematic Mobile Phone Use (PMPU) by the Australian Psychological Society, a condition defined as one of the biggest behavioural addiction challenges of the 21st century which they will anticipate will evolve over time towards internet-connected device addiction as all forms of internet-connected technologies continue to evolve and integrate into our lives. Despite heavy fines and demerit points for drivers who use a mobile phone or other device, like a Smartwatch whilst driving, national mobile phone fines during 2022 equated to \$66 million (Orlando, 2023).

Project Paradigm recognises the need for extensive research and consultation to identify an effective set of responses for addressing children's access to social media. The age verification issue may not be "enforceable at the state level" and supporters suggest this would be more feasible if passed as a national directive.

Discussions in the space of age verification requires a nuanced approach to include parent and carer community-based education, consideration of the positive elements of social media and technology use in the social, emotional wellbeing of children and young people and the development an age verification roadmap that is holistic, viable and proportionate.



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It is the view of Project Paradigm that when any significant decision is made which relates to, and significantly impacts the lives of children and young people, they are to be directly consulted. This would align with **Article 12 of the UN Convention on the Rights of the Child**.

(f) Defining one of the issues with social media - child sexual exploitation (online/offline)

Child Sexual Exploitation (CSE) remains a hidden problem, it is a type of child sexual abuse that is not consistently defined across Australian states (ECPAT, 2018; ECPAT 2012; Cameron et al, 2015). As the term straddles both categories and emerged in response to criticism of discourse around 'child prostitution', CSE becomes a complex, social problem that is difficult to define, and therefore to identify. In Australian discourse, policy, and practice, CSE is most frequently associated with the production, distribution, and possession of Child Exploitation Material (CEM), or is conflated with, or added to the broader categorisation of CSA, online exploitation, and abuse, and has been found to be a significant concern for children and young people who live in residential care (The Royal Commission, 2017). The Victorian Commissioner for Children and Young People's Out of Sight Report (2021) identified that organised exploitation rings actively target children and young people in out of home care and an alarming number of children and young people who 'go' absent or missing from residential care are sexually exploited, abused, and assaulted often by adult men.

Whilst there is a strong focus on online non-contact offending, in person, community contact offending is occurring right across Australia. Often online and offline CSE offending becomes intermingled and present in combination with each other. This process is multidirectional, perpetrators may use devices to initiate contact, entice young people away from their protective supports, use devices to perpetrate CSAM offences, and arrange to meet up in person and also to control and manipulate young people to commit further offences against them or to procure other young people. Concurrently perpetrators may groom young people and then transition to



CSAM production. Neither exists in a vacuum, however legislation currently focuses on online dangers only.

Project Paradigm currently provides consultation and practice guidance to frontline staff across Australia and supports local multi-agency working groups. In this work many cases have been observed where young people, both males and females have experiences of CSE which capture both online and offline contact offending occurring simultaneously.

The relationship between online and offline has most recently been reported by Coen Teunissen and Sarah Napier (2023) who recently published through the Australian Institute of Criminology Trends and Issues in Crime and Criminal Justice, on the overlap between child sexual abuse live streaming, contact abuse and other forms of child exploitation. The pair analysed chat logs of seven Australian-based men who had committed 145 child sexual abuse live streaming offences and examined the overlap between this offending, contact sexual offending and engagement of child sexual abuse material (CSAM). Their research demonstrated travelling to offend against children, use of CSAM and CSA live streaming appear to be interrelated. This is certainly the case when you consider the media's recent reporting of a child care worker arrested and facing contact and non-contact offending charges.

MEDIA REPORT

ABC, AUGUST 1, 2023

A former childcare worker is facing more than 1,600 child abuse charges. The Gold Coast man, 45, is facing 1,623 charges for allegedly abusing 91 children in Brisbane, Sydney and overseas, between the years of 2007-2022. NSW Police intend to charge him with 68 counts of sexual intercourse with a child under the age of 10, 42 counts of aggravated sexual intercourse with a child under 10, 69 counts of aggravated indecent assault and one count

At present there is no formal nationally consistent definition for child sexual exploitation. In its absence, Project Paradigm draws from the United Nations and



uses its definition when in discussions about CSE. As a signatory to the United Nations Convention on the Rights of the Child, Australia has pledged its ongoing commitment to protecting all children from all forms of sexual harm (Australian Human Rights Commission, 2023).

The United Nations says...

Child sexual exploitation is the abuse of a child where some form of remuneration is involved whereby the perpetrators benefit – monetarily, socially, politically, etc. Exploitation constitutes a form of coercion and violence, detrimental to the child’s physical and mental health, development, and education. (United Nations, 2001)

CSE is a form of abuse that does not discriminate based on age, gender, ethnicity, or sexual orientation. Perpetrators will normally target children and young people based on vulnerability, sometimes through sophisticated, tech-facilitated, grooming techniques and often by exploiting the young person’s unmet attachment needs.

The relational aspect of CSE is seen as a major driver in the overrepresentation of children in out-of-home care experiencing this form of abuse (Victoria Commission for Children & Young People, 2021), yet it is the experience of Project Paradigm that this particular cohort of young people (12 years and older) receive inadequate support from care and protection systems because their actions are inappropriately attributed to the motivation of the young people themselves or simply labelled as ‘risk-taking behaviours’, rather than recognising the sophisticated power and control dynamics created by the adults who are exploiting them. The COVID 19 pandemic triggered an increase of online child sexual offending (Salter & Wong, 2021), and as a form of technology facilitated CSE, it is likely that high numbers of children and young people are at an increased risk of being exploited, and therefore a response is imperative.

The language and terminology around child exploitation often implies that the child or young person is responsible for the abuse and crime that they are subjected to, normalising and minimising the child’s experience resulting in a lack of appropriate



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responses. Project Paradigm frequently observes language used across services that reflect this situation, such as labelling the young person as 'promiscuous,' contextualising the abuse as consensual, 'she is a 14-year-old and has a 23-year-old boyfriend,' and 'they are putting themselves at risk.' In each of these scenarios the adult or perpetrator and their behaviour is not the focus, whilst the child or young person is understood to be choosing to be sexually abused (Children's Society, 2022).

Sexually exploited children are often misidentified and labelled in ways that distract from the reality of the abuse they are suffering. This can include:

- placing them in the domain of harmful sexual behaviours;
- viewing them as being engaged in a consensual intimate partner relationship;
- And/or considering them to be in a domestic violence relationship.

This last category is a particular issue for young people aged 16 or 17, the legally determined ages of consent across Australian States and Territories. There is a misconception that young people can consent to a sexual relationship at this age, so practitioners focus their interventions on the behaviour of the young person. There is an expectation for young people to leave or cease the 'relationship', with professionals struggling to identify them as victims of abuse if they cannot extricate themselves from the situation. This experience mirrors that of victims of domestic abuse who have traditionally faced unrealistic and unsafe pressure to leave a domestic violence relationship with the emphasis of professional intervention on the victim (Meyer, 2011). The focus of intervention on the victim is an approach that distracts interventions from the actions and tactics of the perpetrator and seeing the exploitative interaction between victim and perpetrator as a 'relationship' is also a misnomer. Sexual exploitation is a highly lucrative activity (Laird et al, 2020) and can often be the motivator for the perpetrator rather than just for sexual gratification, which could explain the victimisation of boys in CSE as well as girls.

Without defining and describing CSE, there is a continuing 'child prostitution' discourse that is reflected in the media, policy, and practice suggesting that because



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children may 'gain; something from a sexual encounter, they have exercised agency by deciding to engage in such activity. Furthermore, due to social and political constructs of victimhood, if children are considered less vulnerable and/or innocent (McAlinden, 2014) than their peers due to their behaviour or circumstances, they are deemed less deserving of help and are often blamed for the harm and abuse they suffer (Brown, 2015), (National Strategic Partnership on Child Sexual Exploitation, 2022).

A NOTE ON CONSENT

The law in relation to sexual offences against children under the age of 16 treats the victim as being incapable of giving consent. There is a possible defense in a court of law if the victim is over the age of 12 and the accused can prove on reasonable grounds an honestly held belief that the child was over the age of 16. It is worth pointing out however, that when consent is viewed within the context of CSE the UN explicitly states the following: ...the term 'sexual exploitation' refers to all children up to the age of 18; issues of locally defined 'age of consent' are not relevant to the child's right to protection. (United Nations, 2001)

It is also important to note that the range of grooming processes combined with power and control methods employed by perpetrators of CSE, render the young person incapable of identifying the fact that they are being exploited and therefore unable to give informed consent (Welsh Government, 2013). In Queensland for example, these factors are particularly important when considering child victims aged 16 and 17 because their cases are most likely to be dealt with as though they are adults under sub-sections 352 - Sexual Assault, 349 – Rape, and 218 - Procuring Sexual Acts by Coercion, of the Queensland Criminal Code 1899. Even when it can appear as though the young person is initiating the 'relationship' and they are old enough to consent to sexual activity, consent is provided based on informed freedom of choice and capacity. Professionals need to consider whether lack of choice, substance use, or potential power and control dynamics exerted by a perpetrator, are impacting on that young person's ability to consent. (Townson, 2019)

Recent research undertaken by Larissa Christensen and Katarina Pollard (2022) regarding how CSAM offenders are depicted in the media, reiterates the media's reluctance to use alternative terminology instead of inappropriate phrases like 'child pornography' or 'kiddy porn', impacting on how the public perceives the offending behaviour. It could also further trivialize and rationalize the offending by those offenders who already discount the harm of their offending.



It is the view of Project Paradigm that complicating this discussion is a lack of appropriate, trauma informed, consistent language and terminology around child exploitation. Project Paradigm is seeking a formal, nuanced, nationally consistent definition for child sexual exploitation. This would align with **Article 2 of the UN Convention on the Rights of the Child.**

(f) Normalisation of nudes

As we know our children's digital lives have changed and expanded fundamentally over the past ten years with technology now firmly embedded in all aspects of their lives, with many not able to draw a distinction between their 'online' and 'offline' lives, permeating friendships and relationships.

The Internet Watch Foundation and ARU Policing Institute for the Eastern Region recent report, "*It's normal these days,*" speaks about the recent data on self-generated child sexual abuse material (2023), pivotal to any discussions regarding technology usage.

What is SG-CSAM?

Self-generated child sexual abuse material (SG-CSAM) has escalated in recent years, driven by the proliferation of smartphone camera technology and increased internet accessibility. The COVID-19 pandemic, which led to prolonged periods of lockdown, further compounded this issue. Self-generated child sexual abuse material includes intimate or sexually explicit content created by and featuring minors, which can be shared either voluntarily or through coercion, grooming or blackmail.

In a 2020 study, the eSafety Commissioner reported that in Australia, 44% of teens had a negative online experience. The top three negative experiences being contacted by a stranger or someone that they didn't know (30%), receiving inappropriate or unwanted content (20%) and being deliberately excluded from events/social groups (16%) (eSafety, 2021). The eSafety Commissioner states that one in eight complaints of CSAM involved perpetrators directing children to perform explicit acts via a webcam or smartphone. Analysis reveals that 25 per cent of all identified material had been produced in areas of a family home: 16 per cent in a



bedroom, 5 per cent in a living room and 4 per cent in a bathroom, where online predators have manipulated children into not reporting by making them think the adults in their life will punish them, blame them or not believe them (eSafety, 2023).

The term 'self-generated' carries implicit victim-blaming connotations, which we reject because it could prevent children from disclosing harmful experiences, as well as influence how professionals may respond (Jay, 2014). The term also fails to capture the complexities involved in children and young people's online behaviour and their understanding in relation to sharing images, such as non-consensual sharing of self-generated sexually explicit material, which can occur in several contexts; images consensually obtained are then shared with others or posted without consent; sexual images are taken or obtained without consent or through coercion, pressure or deception; images consensually obtained are then used to humiliate, denigrate, threaten or extort money, favours or additional sexual images (often termed sextortion or sexual extortion (Greijer and Doek, 2016).

The sharing of intimate and sexual images is undoubtedly becoming increasingly common in relationships, and although many respondents in these studies recognised a risk of 'non-consensual distribution', this was essentially considered a normal part of sexual exploration and intimate relationship building (Revealing Reality, 2022). However, youth surveys have also found that unwanted requests for, and misuse of, sexual pictures primarily come from peers.

A quarter of all image-based abuse reported by the eSafety Commissioner come from people under the age of 18. Young women are disproportionately affected (Truu, 2022).

Most of the children surveyed reported that receiving nudes is a normal part of life and have learned to accept them. One child stated, "Sharing nude images have been more normalized, people view them as trophies and an object to brag about among other things." (Karlsson and Josephson, 2022).

Woven through much of the data is a sense of embarrassment and shame that broadly relates to sex, and this was reflected in children and young people's



reluctance to talk to their parents/carers about these topics. It was noted that girls were more likely to have their photos circulated than boys.

Karlsson and Josephson (2022) identified a need to ensure broad community education that sharing on legal and illegal activity noting that children are not aware of the legal implications that sharing non-consensual content can constitute. Sharing non-consensual content is a breach of one's violation and trust.

- A focus on protecting young people who may be at risk.
- Understanding the fundamentals of what healthy, safe, and respectful relationships look like online and offline.

Project Paradigm supports the need for board community-based education around the taking and sharing of nude images, utilising the eSafety Commissioner's tailored educational resources. This would align with **Article 17 of the UN Convention on the Rights of the Child**.

Parents and CSAM production

Professor Michael Salter et al (2021), reported on the production and distribution of child sexual abuse material by parental figures across Australia. This research found perpetrators are most often the male parental figures of the victims, and victims are predominately girls under nine years of age. The research noted that sexual exploitation in the family often begins at a younger age and involves more serious and frequent offending for a longer duration, compared to extra-familial abuse (Salter 2013b).

"While parents are often positioned as partners in online safety education and abuse prevention, this study highlights the significant role played by parents in the production of CSAM, and the lack of evidence and guidance for policymakers, practitioners and law enforcement in this crucial area," said Dr Brown (AIC, 2021).

It is the view of Project Paradigm that there is a need for greater acknowledgement of parents and carers as perpetrators in CSAM production by researchers and policymakers to ensure children and young people are protected from harm. Sexual abuse and online safety education programs should include sensitive messages to



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children about image-making by family members and relatives, and where and how to seek help to disclose. Furthermore, community education programs should be developed targeted at women who are repartnering and at risk of being groomed by offenders seeking to abuse their children. These programs should explain how offenders seek to groom women and the signs of a groomed child and should be targeted through dating apps or social media marketing. Community messaging should be developed aimed at women who become aware that their partner is accessing CSAM, encouraging them to contact appropriate support services or phone lines to discuss their concerns (Salter et al, 2021).

Parenting in the digital age

Young Australians use a wide array of social apps, messaging apps, and online games, especially TikTok, Instagram, YouTube, SnapChat, Minecraft, and Fortnite. Over 75 percent of young people indicated that they have used YouTube or Instagram. Nearly 70 percent have used TikTok or SnapChat. Typically, they first joined Instagram and SnapChat in late primary school—with or without their parents' permission (University of Sydney, 2023).

Australian *Four Corners* recently investigated the 'contagion effect,' of social media influencers on children and young people, where parents and carers have knowingly created social media accounts for their child/children to share their content for commercial gain.

Four Corners found many child influencers who were posting on Instagram a keen interest in gymnastics, dance or modelling, attracted unwanted attention and sexual comments from accounts that appear to be run by men. The eSafety Commissioner, Julie Inman Grant raises serious concerns about the way platforms commodify and glorify the sexualisation of children, "we are not going to put our kids in short shorts and midriff tops on a dark street corner in Kings Cross in the middle of the night to see what kind of response they get from young men, but we are doing the same in the online world where there are literally millions of people. We seem to think there is a degree of safety because they are online but there is just a different kind of



harm.” Several platforms including Instagram allows parents and carers to sell exclusive images and videos of their children for a fee.

Project Paradigm identifies several key areas of concern regarding the ‘kidfluencer’ trend, including:

- The current discourse regarding age verification restrictions would fail to curtail parents and carers from engaging in this current activity.
- A lack of online privacy for kidfluencers, who have many aspects of their lives publicised online.
- The commodification and sexualisation of children, where private images and content are sold through subscriber memberships.
- Questions regarding child’s ability to consent and their rights regarding social media and their digital footprints.
- Overarching government supervision of children and young people used in brand endorsements and commercial activities online.
- Adherence to the Optional Protocol on the Sale of children, Child Prostitution and Child Pornography – of which Australia is a signatory.

Recommendations

As stated, our stance is one of ensuring that the best interests of the child is the primary consideration in **all** decisions captured within the proposed actions of the Joint Committee on Social Media and Australian Society.

It is the view of Project Paradigm that given the significance of the decisions regarding social media age verification, children and young people are directly consulted on any proposed actions.

In addition, Project Paradigm recommends the following;

- appropriate, trauma informed, consistent language and terminology around child exploitation,



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- the adoption of a formal, nuanced, nationally consistent definition for child sexual exploitation and abuse,
- community-based education around the taking and sharing of nude images, utilising the eSafety Commissioner's tailored educational resources,
- sexual abuse and online safety education programs that include sensitive messages to children about image-making by family members and relatives, and where and how to seek help to disclose,
- community education programs that target women who are repartnering and at risk of being groomed by offenders seeking to abuse their children,
- community messaging aimed at women who become aware that their partner is accessing CSAM, encouraging them to contact appropriate support services or phone lines to discuss their concerns,
- a clear discussion about the role social media plays in the commodification of children and young people, looking to community education and supporting efforts to hold platforms accountable,
- government support of the eSafety Commissioner's efforts to ensure child sexual exploitation material be removed on social media platforms and the internet, limiting access to adult content for children and coordinating industry safe codes that protect children and young people,
- age verification for **all** adult content,
- government commitment to detect and remove all known child sexual abuse material of Australian children and an established notification system where Australian victims are informed if an image or content is detected and sufficient mechanisms for restitution,
- legislation to protect the rights of children and young people whose images and content are online, given their inability to consent.

Our vision is a national community that acknowledges, understands and values childhood by committing to the protection of children and young people through collaboration, advocacy and support. Project Paradigm is a national strategy that works to support prevention, early intervention and community capacity building in



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the effort to ensure children and young people are free from harm through exploitation.

We would welcome the opportunity to discuss this submission further.

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