



PARENTS FOR PRIVACY REFORM



9 February 2024

Dear Attorney General, Minister for Families and Social Services, and Minister for Communications,

As parents and guardians of children and young people who will grow up online, and organisations committed to the rights, safety and well-being of children and young people, we believe that reform of Australia's privacy laws is more urgent than ever. We note the extensive process that the Attorney General's department has conducted as part of the reform process, and welcome the government's acceptance of the majority of the reform agenda. The sensible and necessary next step is action to finalise bold reform.

Every child has the right to explore their interests, pursue their passions and cultivate their curiosity without fear of tech companies using this information to profile them. The current state of privacy law in Australia allows data accumulation on a mass scale with few limits. This means that children are being taught to accept that surveillance is the price of participation in online life. It also means that young people are growing up in digital spaces that are designed for endless engagement, rather than meaningful connection, because this serves the business model by creating more valuable advertising space. Worse still, recent research found that these companies use their access to children to market unhealthy and harmful products to them, including alcohol, gambling and junk food.¹ We are allowing young people to be inducted into a digital world characterised by extremism and misinformation.

We are particularly concerned about the role of technology in children's education. Children are now required to spend significant amounts of time engaging with technology as part of their schooling, with little to no protection of their privacy. A recent Human Rights Watch report found that millions of Australian children were at risk of surveillance and tracking by shadowy companies, who exploited their access to kids during periods of remote learning.² For both children and their parents, there was no way to opt out. Too often, the interests of EdTech companies are prioritised over the rights of children. This is the first stage of what many companies hope will be a lifelong pattern of acceptance of technology that violates privacy.

¹ 'Facebook and Instagram are bombarding young people with targeted alcohol, gambling and unhealthy food ads,' *Foundation for Alcohol Research and Education*, February 2023. Available at: <https://fare.org.au/facebook-and-instagram-are-bombarding-young-people-with-targeted-alcohol-gambling-and-unhealthy-food-ads/>

² 'Investigation reveals tracking by EdTech of millions of Australian school students during COVID lockdowns,' *ABC News*, 26 May 2022. Available at: <https://www.abc.net.au/news/2022-05-25/investigation-reveals-educational-tech-tracking-children-data/101091808>

This has to change. The data-driven economy must be rebalanced to allow young people to reclaim their autonomy. Parents should feel comfortable that their children's education, especially in respect of technology, is conducted in privacy-respecting ways.

All Australians would benefit from bold privacy reform. Children are particularly vulnerable unless such reform is implemented urgently. We look forward to supporting the progress of your department and government in implementing recommendations put forward in the recent review.

Sincerely,

Organisations

Digital Rights Watch

Act for Kids

Alannah & Madeline Foundation

Alliance for Gambling Reform

Australian Health Promotion Association

Centre for Digital Wellbeing

Centre for Responsible Technology

Children & Media Australia

Children and Young People with Disability Australia

Electronic Frontiers Australia

Food for Health Alliance

Foundation for Alcohol Research & Education

Gambling Harm Lived Experience Experts

Health Consumers Council

Hello Sunday Morning

IIS Partners

Public Health Association Australia

Salinger Privacy

Save the Children

The Parenthood

Uniting Church in Australia, Synod of Victoria and Tasmania

VicHealth