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Thursday 21 November 2024

To whom it may concern

RE: yourtown response to the Phase 2 Draft Industry Codes

yourtown welcomes the opportunity to respond to the draft Consolidated Industry Codes of Practice for the Online Industry (Class 1C and Class 2 Material). We believe this consultation process provides opportunities to minimise unintended consequences and leverage the significant work conducted in the first phase of the codes development process and expedite Phase 2 Codes.

yourtown is a trusted provider of services for young people, with a focus on mental health and wellbeing, family relationships, parenting and early childhood development, long-term unemployment, prevention of youth suicide, child protection, and support for those experiencing domestic and family violence. Established in 1961, our Mission is to enable children and young people, especially those that are marginalised and without voice, to improve their quality of life.

yourtown has previously responded to the Phase 1 codes and standards developed by Industry Associations. We advocated to exclude online counselling and health services from requirements that would hinder information and help seeking behaviours, particularly from children, young people and vulnerable groups. We appreciate that the Designated Internet Services Standard classed websites providing information for counselling and support services as low risk of being misused for Class 1A and Class 1B material and therefore had minimal or optional compliance obligations.

yourtown strongly supports the aims of the Phase 2 industry codes to prevent children from accessing or being exposed to age-inappropriate material online and to provide all end-users with effective information, tools and options to limit access and exposure to this material. However, we are concerned that access to information and support material for those who are experiencing a crisis, being abused or are contemplating the need to access support, will be compromised by the approach that is being taken. Many children and young people seek information and support through **yourtown's** Kids Helpline's digital channels. In 2023-24, 1.595 million users accessed the content and resources on our website, 51% of our contacts were completed online through webchat or email, over 6,300 active users were on our online peer support network My Circle, and 1,332 new users accessed our Niggle app and 1,138 sessions were conducted by young people self-managing their mental health using this app.

We want to ensure that online resources and supports, such as Kids Helpline, are not inadvertently captured under the Codes' obligations related to Class 2B 'themes' that include suicide, crime, drug and alcohol dependency, death, serious illness, family breakdown, and racism. **yourtown** recommends that reputable counselling and support services of children and young people that provide information based on evidence and human centred design processes should be classed as minimal risk and therefore be excluded from compliance obligations. Exclusion of information,



counselling and support would mean young people's help-seeking journeys remain unimpeded and the risk of long-term consequences can be minimised.

We are particularly concerned about the Kids Helpline website being impacted by these regulations. The Kids Helpline website and Niggle app provides instantly accessible, age appropriate, tailored resources to support Kids Helpline direct counselling activities and a variety of community and government organisations with information related to issues including mental health, emotional wellbeing, suicide-related concerns, family relationships, dating and relationships, grief and loss, bullying, and sextortion. These resources include articles, videos, quizzes, podcasts, stories, and content created so that young people can access the level of support that best meets their needs. The website and app have been developed using human-centred design processes and the content is informed by contemporary evidence and the expertise of professional and qualified Kids Helpline counsellors and staff. This process helps to ensure that the information is reliable, easy to understand, trustworthy, current and accessible. If there is not action to ensure that these types of resources remain available, we will be increasing risks related to wellbeing and mental health for children and young people.

Counselling and professional support websites and apps play an important role in help-seeking, dissemination of information, prevention, early intervention, harm minimisation, and access to crisis support. Our experience and consultations with children and young people have clearly articulated that young people assess and evaluate a service before accessing it and will use different channels to do so. Websites, apps and online resources are a core component of these processes and must be readily available to all children and young people to help them to build trust and willingness to commence the help-seeking process.

We encourage the Industry Associations to exclude counselling and support websites and apps from the Codes' obligations for compliance to ensure that all children and young people can access timely and appropriate support.

If you should require further information or clarification about any of the issues we have raised in our submission, please do not hesitate to contact me, on 0416 185 154 or email tadams@yourtown.com.au or Ben Pook Advocacy and Government Relations Manager, at bpook@yourtown.com.au or 0421 956 262.

Yours sincerely

Tracy Adams
Chief Executive Officer