

Tuesday, 17 June 2025

CC25-0015

Sunita Bose
Managing Director
DIGI

By email: [REDACTED]

Cc: Privacy Commissioner Carly Kind, DLO Minister Wells

Dear Sunita:

I hope you are keeping safe and well.

I'm writing in reference to your comments in *The Australian* last week ('Industry body Digital Industry Group calls for more collaboration over tech policy'), where you called for greater balance in digital industry regulation. In particular, you noted the "persistent tensions between privacy and safety" in relation to the Online Safety Amendment (Social Media Minimum Age) Act 2024.

I was particularly concerned about this quote: "There are persistent tensions between privacy and safety – for example, the social media minimum age law, which will come into effect in six months, will see Australians of all ages having to verify their age with increased personal information across a range of services."

What concerns me is that this statement implies that the obligations on industry to take reasonable steps to prevent children under 16 years of age from having a social media account will require providers to age verify all their Australian users, when that is not the case. Furthermore, many of your member companies have indicated that while blanket verification of all Australian users may be one method, it is also acknowledged to be much more privacy invasive method than some of the others currently used by platforms through a range of behavioural and account signals. So, if a platform were to take that step, one which the legislation does not require, that would be provocative and clearly raise concerns.

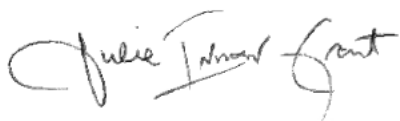
As you know, I have long argued that safety and privacy are often complementary—not mutually exclusive—policy objectives. I want to assure you that, as eSafety prepares for the

Act to take effect in December this year, we are working very closely with the Office of the Australian Information Commissioner. This includes developing regulatory guidance materials outlining what reasonable steps industry might take to comply with the Act, and to ensure we balance both of these imperatives.

I agree that government entities benefit from working with industry to ensure regulations are practical, effective, and safe. That is why eSafety is in the late stages of planning broad consultation, including with the digital sector, to deeply consult on the reasonable steps guidance. We look forward to engaging several of your members soon to provide more information on the consultation format and timeframes. More information about the consultation can be found at [this link](#).

Finally, given the public nature of your comments and in the interests of transparency and a fully informed public discussion, we may also publish this letter on the consultation page on our website.

Yours sincerely,

A handwritten signature in black ink, reading "Julie Inman Grant". The signature is fluid and cursive, with the first name "Julie" being the most prominent.

Julie Inman Grant