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22 September 2026

Digital Duty of Care Consultation

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Via email: digitaldutyofcare@communications.gov.au

Dear Secretariat,

Re: Submission on the Exposure Draft - Online Safety Amendment (Digital Duty of Care) Bill 2026

Good Things Australia welcomes the opportunity to provide feedback on the Exposure Draft of the Online Safety Amendment (Digital Duty of Care) Bill 2026, released by the Australian Government on 8 September 2026.

Good Things Australia supports the intent of the Digital Duty of Care to place greater responsibility on online service providers to proactively identify, prevent and mitigate foreseeable online harms.

As more of everyday life moves online, including banking, government services, work, education, health and social connection, all Australians should be able to participate safely and confidently. People should not be expected to navigate increasingly complex online risks on their own.

Digital safety is a digital inclusion issue

In Australia, 1 in 5 people are digitally excluded[1] with certain groups much more likely to be left behind, including older Australians, people with disability, women, First Nations people, people on lower incomes, people with lower levels of education and people living in regional and remote areas.

Digital exclusion is not simply about whether someone has internet access. It is also about whether people have the skills, confidence and ability to participate in an increasingly digital society.

Good Things Australia's latest consumer research shows that many Australians do not feel confident navigating online risks with:

- 53% worried that online scams are becoming harder to spot
- only 30% feel confident they can avoid scams online
- just 28% feel confident managing their privacy and safety settings
- only 31% feel confident distinguishing reliable from unreliable information online
- 22% want more education on how to stay safer online.[2]

[1] Thomas, J. et al. (2025), *Measuring Australia's Digital Divide: Australian Digital Inclusion Index 2025*, RMIT University, Swinburne University of Technology and Telstra.

[2] Good Things Australia research, August 2026. Nationally representative survey of 2,000 Australian adults, independently conducted by Pureprofile.

Aggregated data from Good Things' Digital Skills Checker, which captures the learning goals of people participating across our digital skills programs, shows that staying safe online is the number one learning goal. Participants most frequently seek support with online safety basics such as passwords, managing privacy settings and avoiding scams.[3]

This comes at a time when Australians made more than 481,000 scam reports in 2025, with reported losses of $2.18 billion..[4]

Online harm extends well beyond scams. Half (51%) of Australian adults have experienced technology-facilitated abuse in their lifetime, while eSafety research found almost one in five (18%) adults surveyed had personally experienced online hate in the previous 12 months.[5]

While scams and financial harms are being addressed through other regulatory frameworks, these findings demonstrate a broader issue: many Australians do not feel confident navigating online risks, while online harms continue to affect people of all ages.

The Digital Duty of Care is therefore an important opportunity to consider online safety through a digital inclusion lens.

Executive summary and recommendations

Good Things Australia supports the introduction of the overarching Digital Duty of Care in section 26 of the Bill. From a digital inclusion perspective, we recommend that the final framework:

1. **Protections for adults and children (ss 25B–25D):** provides meaningful protection for all Australians, including adults who may be at greater risk of online harm or digital exclusion.
2. **Design features and user empowerment (ss 25F and 26(4)–(6)):** embeds safety by design and safe defaults, rather than relying too heavily on individuals to understand and manage complex safety settings.
3. **Complaints and dispute resolution (s 26F):** ensures people have simple, accessible pathways to support and redress when things go wrong, while maintaining existing online safety protections.
4. **Implementation of the Digital Duty of Care:** is accompanied by investment in community based digital literacy and online safety education, so people can participate safely and confidently in a rapidly changing digital world.

Detailed recommendations

1. Protections for adults and children – ss 25B–25D

Good Things Australia strongly supports additional protections for children and young people outlined in the Bill. However, it is also important that the framework provides meaningful protection for adults, particularly those who may have lower levels of digital confidence or ability.

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[3] Good Things Australia Digital Skills Checker, June 2026. Participant data recorded Good Things Australia, Digital Skills Checker data, aggregated learner goals across Good Things Australia digital skills programs.

[4] National Anti-Scam Centre (2026), *Targeting scams: report of the National Anti-Scam Centre on scams data and activity 2025*, Australian Competition and Consumer Commission.

[5] Australian Institute of Health and Welfare, *Stalking and surveillance*, citing ANROWS Technology-Facilitated Abuse Survey (2022); eSafety Commissioner, *Hate in the digital age: Adults' encounters with online hate* (2024).

Children rightly need stronger and age appropriate protections. But turning 18 does not automatically give someone the skills and confidence to navigate complex digital environments.

Adults also experience serious online harms, and these can be more acute for people already experiencing digital exclusion. The framework should avoid creating an arbitrary "age cliff" in protection.[3]

The legislation and its implementation should recognise that people have very different levels of digital ability and confidence, and that these differences can affect their capacity to recognise risk, manage settings, understand warnings and seek help.

We recommend that the Digital Duty of Care provides meaningful protections for adults as well as children, with particular consideration given to people at greater risk of digital exclusion and online harm.

2. Design features and user empowerment – ss 25F and 26(4)–(6)

Good Things Australia supports measures that give people greater choice and control over their online experience. However, user empowerment should not become user responsibility.

People who are less digitally confident may be the least likely to understand an algorithm, find a safety setting, change a default, assess the implications of opting in or out of a feature, or know what action to take when something goes wrong.

This aligns with eSafety's established Safety by Design principles, which state that "the burden of safety should never fall solely upon the user" and emphasise designing safety into online products and services from the outset. eSafety also advocates default privacy and safety settings at the highest possible levels when users sign up.

Safety needs to be built into the design of services, not just focused on individual pieces of harmful content. This includes considering how AI-powered recommender systems, hyper personalised targeting and other product features can contribute to harm.[4]

We recommend that the framework prioritise safety by design and safe defaults, with user empowerment tools that are simple, accessible and appropriate for people with different levels of digital ability.

3. Complaints and dispute resolution – s 26F

Prevention should be the priority, but no system will prevent every instance of online harm. When something does go wrong, people need to know where to turn and be able to access help without navigating complex processes.

Reporting and complaints mechanisms should be easy to find, easy to understand and accessible to people with different levels of digital literacy and ability. This is particularly important for people who may already feel overwhelmed, embarrassed or uncertain about what has happened.

This should include clear information about who is responsible, what action can be taken and where people can go if an issue is not resolved. eSafety's Safety by Design approach similarly identifies accessible reporting pathways and controls as critical elements of user empowerment.

As the new framework is implemented, it will also be important to ensure the transition does not inadvertently weaken existing online safety protections, reporting mechanisms or regulatory capabilities.

We recommend that the complaint and dispute resolution processes required under section 26F are accessible and easy to navigate, particularly for people with lower levels of digital confidence.

4. Implementation – regulation and digital literacy need to work together

A Digital Duty of Care can shift greater responsibility upstream to the organisations designing and operating online services. However, regulation alone will not give people all the skills and confidence they need to participate safely online.

Technology will continue to change. Australians will continue to encounter new platforms, artificial intelligence, new forms of online content and emerging risks. People therefore need ongoing opportunities to build their digital skills and confidence.

For people experiencing digital exclusion, trusted community organisations play an important role. They provide a place where people can ask questions, learn at their own pace and seek support without judgement. Good Things Australia's work with community organisations across Australia demonstrates the value of this place based approach, particularly for older Australians, people with disability, migrant and refugee communities and others at risk of digital exclusion.

A strong Digital Duty of Care should therefore be complemented by accessible education that helps Australians understand online risks, the protections available to them, how to exercise their rights and where to seek help.

We recommend that implementation of the Digital Duty of Care be accompanied by investment in community based digital and AI literacy and online safety education, with a particular focus on people most at risk of digital exclusion.

Conclusion

Good Things Australia supports the introduction of the Digital Duty of Care and its shift towards greater responsibility for online safety sitting with online service providers.

For Good Things Australia, this is also a digital inclusion issue. People with lower levels of digital skills and confidence should not receive less protection because they are less able to navigate complicated settings, understand algorithms or identify emerging risks.

We encourage the Government to ensure the final framework protects adults as well as children, embeds safety into the design of digital services, provides accessible pathways to help when things go wrong, and is complemented by community based education and support.

Safer digital environments and stronger digital skills need to work together. This will help ensure all Australians can participate safely, confidently and fully in our increasingly digital world.

About Good Things Australia

Good Things Australia are future focused digital inclusion leaders, advocating, partnering, educating and innovating to ensure no one is left behind in the digital world. We believe good things happen when everyone is safely, confidently and affordably online. We work to close the digital divide so no one is left behind.

We develop and deliver a range of innovative digital inclusion programs to support those most in need, including people over 50 years of age, people with intellectual disability, migrant and refugee women, and low income families.

We partner and collaborate with other social impact organisations, industry and government to provide holistic, sustainable and impactful digital inclusion programs and to advocate to close the digital divide.

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Good Things Australia acknowledges the traditional custodians of the land and pays respect to Elders past and present. We are committed to listening to the voices of Aboriginal and Torres Strait Islander peoples and support action towards healing and reconciliation.