

7 December 2020

The Hon Paul Fletcher  
Minister for Communications, Cyber Safety and the Arts  
via Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

*Uploaded to acma.gov.au; forwarded by email to Minister Fletcher*

Dear Minister Fletcher,

### Children's television standards

The Association of Heads of Independent Schools of Australia (AHISA) appreciates the opportunity to participate in the Australian Communications and Media Authority (ACMA) consultation on proposed changes to children's television standards.

As regulators, governments are key agents in protecting children from harm and, importantly, from risk of harm. In a rapidly evolving digital and media landscape, the Australian Government has proven itself willing to act as a responsible partner to parents and educators in addressing harms and mediating risk to children, most notably through ACMA and the Office of the eSafety Commissioner and related legislation and industry regulation.

AHISA recognises the value of a legislative and regulatory framework that supports industry to partner responsibly in efforts to protect children and young people, while at the same time encouraging innovation and creativity and offering sufficient flexibility for industry – and free-to-air television broadcasters in particular – to adapt to changes in their operating environment. Changes in broadcasting are now so rapid that unless industry has the incentive to self-monitor, children will be perpetually at risk of harm as government regulation plays catch-up.

There is a tension between the development of new platforms and products and the imperative of free-to-air television to maintain market share on the one hand, and the rights of consumers and particularly children and young people on the other. To address this, AHISA recommends that in changing existing legislation and regulation on children's television standards and Australian content for children's programs, the Minister also directs ACMA to undertake annual monitoring of children's viewing habits across multiple platforms. The aim of such monitoring could be three-fold: (1) to assess the impact of proposed legislative changes on children's exposure to harmful content; (2) to identify any emerging risks to children and young people; and (3) to evaluate whether children and young people have the opportunity to access Australian content that is sufficient and appropriate to reflect their lived experience and support their cultural formation.

Yours sincerely,

**(Ms) Beth Blackwood**

AHISA Chief Executive Officer  
ceo@ahisa.edu.au