

Submission on:

Inquiry into the harm young New Zealanders encounter online, and the roles that Government, business, and society should play in addressing those harms

July 2025

- 1. The <u>Classification Office | Te Mana Whakaatu</u> (the Office) welcomes the opportunity to submit on parliament's inquiry into the harm young New Zealanders encounter online.
- 2. We have a wealth of experience in researching content harms, classifying content, and providing information to the public. Our expertise in harm prevention and working with young people is relevant to the inquiry and we are happy to assist in any way we can.

About the Classification Office | Te Mana Whakaatu

- 3. The Office is an independent Crown entity focused on keeping New Zealanders safe from content harm. We are established by the <u>Films, Videos, and Publications</u> <u>Classification Act 1993</u> (the Classification Act) to classify publications¹ that may need to be age-restricted² or banned, and to provide public information about the classification system and our classification decisions.
- 4. We prevent exposure to harmful content while upholding the right to freedom of expression. We empower New Zealanders to make informed choices about what they, and their rangatahi and tamariki, watch.

¹ Our functions under the Classification Act limit our classification role to "publications", which include (among other things) films, games, video on-demand content, books, sound recordings, pictures, newspapers, photographs, prints or writings, electronic or computer files, and copies of images or sounds that have been livestreamed.

² For example, R13, R16, or R18. See our website for more information about age ratings.



Our functions

- 5. Our role includes classifying potentially objectionable (illegal) material submitted by enforcement agencies and the courts. The majority of this involves child sexual abuse material and content promoting terrorism and violent extremism.
- 6. As part of our statutory research and information functions, the Office conducts research and produces evidence-based resources to promote media literacy and positive engagement with media content. To empower people to exercise their right to freedom of expression we equip them with evidence-based resources so that they can make their own content choice that are right for them or their family. This is part of a public health approach to harm reduction where we balance public awareness about safety against restrictions and punishments.

Youth Advisory Panel (YAP)

- 7. We established a YAP in 2018 to ensure we represent a youth perspective in our classification, information, and research work. The panel is made up of a diverse group of rangatahi between the ages of 16 to 19, based in the wider Wellington region. During panel meetings, members express their views and perspectives on the impact of harmful media and the way the Classification Office responds to those issues. While the YAP is not designed to represent all young New Zealanders, their voices provide us with important insights into our work and how it affects young people.
- 8. Our YAP will provide their own submission on this Inquiry. They will provide their expertise as young people and act as a conduit to bring in information from their peers, school, and whānau. What they share will be from their perspective and won't represent the Office's views.

Research we have conducted that is relevant to your inquiry

9. In the last 7 years we have <u>researched topics</u> ranging from pornography and body image to misogyny and extreme (potentially objectionable) online content. While we do not have comprehensive quantitative data on young people's exposure to harmful online content, our research and discussions with young people suggests that they are regularly encountering harmful content and are often unsure how to respond, or where to go for help.

Snapshots of public attitudes to classification and harmful content (annual survey)

10. Each year we survey the public on their attitudes to the classification system, harmful content, and online safety. These annual surveys began in 2023 and indicate broad concerns about children and young people seeing harmful content – especially online.



They also tell us that people care about ratings and content warnings, particularly when selecting media for younger viewers.

What We're Watching (2022)

- 11. Our 2022 research, *What We're Watching*³, revealed that many young people have encountered content promoting harmful behaviours. The 200 young people (aged 16 to 17) surveyed for this research encountered:
 - violence targeting specific groups (31%)
 - violent extremism or terrorism (20%)
 - self-harm (15%)
 - suicide (16%)
 - eating disorders (15%).

NZ Youth and Porn (2018)

12. We commissioned Kantar Public to undertake a nationwide survey of 2,071 young people aged 14 to 17 years.

13. Key findings:

- One in four young people first saw porn by the age of 12, and three out of four had seen it by age 17.
- Most young people (71%) were not seeking it out when they first saw it.
- The majority of respondents (89%) agreed that children should not see pornography, and 71% agreed there should be some kind of restriction on access for people under 18 (for example by blocking or filtering content, or age verification).

Growing Up with porn: Insights from young New Zealanders (2020)

14. We commissioned The Collaborative Trust for Research and Training in Youth Health and Development to interview 52 young people aged 14 to 17 about their experience and views about pornography.

15. Key findings:

- Porn has become normalised for young people whether or not they watch it. While young people think access to porn is too easy, they are curious about sex, and porn is a default learning tool for all genders.
- Porn can have a negative impact on body confidence and young people think porn can negatively influence sex by creating false expectations.

³ What We're Watching | Classification Office



• Participants wanted information about porn to be part of sexuality education in schools. They said the way adults talk about porn can be a barrier to having open and positive conversations.

Online Misogyny and Violent Extremism: Understanding the landscape (2024)

- 16. We published a focused literature review on online misogyny and violent extremism, a summary of government and social media responses to this type of content, and a content analysis of New Zealand-based posts on fringe platforms⁴.
- 17. We produced both an online resource⁵ and a summary report⁶ based on the literature review.

18. Key findings:

- Women and girls are more likely to encounter gender-based and severe forms of abuse online. This adversely affects their mental health, and these harms are amplified for women and girls with intersecting identities.
- Algorithms amplify misogynistic and extremist content and create pathways for vulnerable individuals to be exposed to more extreme ideologies. There is evidence⁷ to suggest that algorithmic bias may amplify misogynistic or abusive content on some online platforms.
- Emerging categories of content and technology, such as AI-generated deepfakes, pose increasing challenges for online safety.

Digital Reflections: The online experience and its influence on youth body image in Aotearoa (2024)

19. We partnered with <u>Netsafe</u> to undertake this research, involving interviews with 58 young people aged 14 to 17 about their experience of body image content online. <u>The research</u> aims to help us understand the complex online experiences influencing the mental and emotional wellbeing of young people in Aotearoa New Zealand.

⁴ Case study: content analysis of fringe platforms | Classification Office

⁵ Online Misogyny and Violent Extremism – Online Resource | Classification Office

⁶ Te Mana Whakaatu Classification Office. (2024). <u>Online misogyny and violent extremism:</u>
<u>Understanding the landscape (Summary Report)</u>. Wellington, NZ: Te Mana Whakaatu Classification Office

⁷ See Rathee, S., Banker, S., Mishra, A. & Mishra, H. (2023). <u>Algorithms propagate gender bias in the marketplace—with consumers' cooperation</u>. Journal of Consumer Psychology and Binns, R., Veale, M., Van Kleek, M. & Shadbolt, N. (2017). <u>Like trainer, like bot? Inheritance of bias in algorithmic content moderation</u>. Social Informatics: 9th International Conference, SocInfo 2017, Oxford, UK, September 13-15, 2017, Proceedings, Part II 9 (pp. 405–415). Springer International Publishing.



20. Key findings:

- Young people are seeing and engaging with a variety of body image content, often from an early age. Young people can find both helpful and harmful online content, but algorithms sometimes make it hard to get positive and reliable information.
- Young people are facing increasing pressure around how they look, regardless of gender, and think the influence of body image content is a big issue.
- Young people want better educational resources and support and social media to offer better content control and more realistic and diverse portrayals of body image.

Content that Crosses the Line: Conversations with young people about extremely harmful content online (2025)

21. We consulted ten groups of young people (aged 12 to their early 20s) about their exposure to extremely harmful content in online spaces. The resulting report is intended to guide the development of training and educational and resource materials for educators, parents, and caregivers. We want young people, and the adults who support them, to have the knowledge and skills to recognise and respond to extremely harmful online content.

22. Key findings:

- Encountering extreme and sometimes illegal or banned material is part of life online for many young people. It can be difficult for some young people to avoid.
- Curiosity is a key driver for engaging with content.
- Real-world graphic violence was the most common type of extremely harmful content mentioned by young people.
- Young people want to be able to receive help when dealing with this sort of content without fear or judgement and to feel empowered to handle situations where they encounter this kind of content.

Effectiveness of current harm reduction

There is a gap in the media regulatory landscape when it comes to online content

23. The internet is largely unregulated in Aotearoa New Zealand. There is no mandated safety standard for online platforms. Online platforms may have terms of service, but it is unclear to what extent these are enforced. Complaints about harmful content on the internet tend to go to Netsafe or law enforcement agencies. Figure 1 provides an overview of the media regulation landscape in New Zealand.

⁸ Te Mana Whakaatu, (2025). <u>Content that Crosses the Line: Conversations with young people about extremely harmful content online</u>.



The Consuming Public Advertising Media Broadcasting Classification Classification Classification Netsafe Courts Office Standards Council Standards Office Office Approved Agency Classification Authority Authority Streaming Labelling Labelling Office Harmful Digital Self-Regulation Self-Regulation Govt-Regulation Body Providers Act (HDCA) Govt Mandated Govt-Regulation Govt-Regulation Enforcement Criminal Law Complaints or Pro Active Standards & Complaints Complaints Enforcement Investigations Advertising Broadcasting Cinema & Streaming Digital "Things" News & Literature Digital Websites e.g. software Reporting DVD Services Terms of service:

Most online providers usually work to the standards of the countries to which they are based, and this is reflected in their terms of service, for example many social media providers are restricted to those 13 years and older due to the Children's Online Privacy Protection Act 1998 in the United States. Most providers prescribe in the terms of service the type of content that they allow on their platform. Enforcement of the terms however is up to the provider. In the absence of regulation, the Classification Office has a role of determining, usually at the request of NZ Police or DIA investigators, whether a publication is objectionable, i.e. illegal in New Zealand. Significant criminal liabilities can attach those who make or distribute objectionable publications. Some Child Sexual Abuse material is filtered from some online systems by internet service providers who participate in the DIA managed Digital Child Exploitation Filtering System. Pro Active: Standards & Complaints:
This regulatory approach involves the establishment of codes against which industry is expected to perform. Complaints mechanisms allow the public to complain about breaches of those codes to the regulator.
The ASA is an industry body has an Advertising Standards Code and five sector codes including "Children and Young People".
The Media Council applies its principles and is a membership organisation.
The BSA is a statutory entity and issues a Broadcasting Standards Codebook that broadcasters must adhere to, including rules about programme age ratings and warnings. Standards & Complaints: Complaints: Terms of service: complaints: Literature does not need to be labelled before distribution. It may however be submitted for classification where there are concerns and labelled where restricted. This regulatory approach oversees the application of age rating and content warning prior to public consumption. The restricted ratings issued by the Classification Office are legal registrations.

Some streaming services can rate their own content if they operate, with the approval of the Chief Censor, to standards set by the Classification Office. restricted. Netsafe is an organisation approved in legislation to administer complaints related to the HDCA. These can be submitted as publications to the Office, usually by NZ Police or DIA investigators.

Figure 1: Overview of content regulation in New Zealand

Labelling requirements are inconsistent

24. While specific streaming services listed in <u>Schedule 4</u> of the Classification Act are required to provide accurate age ratings and content information, there is no such requirement to label other online content. Makers of YouTube videos and games released on online platforms (including mobile games) may voluntarily provide content information, but are not required to.

We are modernising the way we classify content to help combat the more extreme online harms

- 25. While we are not responsible for investigations or enforcement, the Office contributes to wider efforts to reduce the availability of objectionable content in Aotearoa and globally. We work closely with domestic agencies, including the NZ Police, the Department of Internal Affairs, NZ Customs, and the courts. Internationally, our work contributes to networks such as Tech Against Terrorism, the Christchurch Call, and Project Arachnid. Project Arachnid is run by the Canadian Centre for Child Protection and aims to detect and remove child sexual abuse material from the internet. We support their processes by reviewing and categorising sexual abuse material that they have found.
- 26. We are building our capability to use hashing technology, an internationally recognised method for recording, searching for, and sharing information. This technology will potentially allow us to share information about material classified as



objectionable with law enforcement agencies and global networks without sharing the original content.

Final comments

- 27. We appreciate the opportunity to submit on this inquiry and would welcome any further engagement with the Select Committee as this work progresses.
- 28. We are happy to provider further information on our research, this submission, or any other questions you may have.