



**TELSTRA CORPORATION LIMITED**

**Submission in response to Joint Select  
Committee inquiry on**

***Cyber-Safety***

25 June 2010

# Executive Summary

Cyber-Safety is an important public policy issue for all Australians. As Australia's largest Internet Service Provider (ISP) we play a leading role in Cyber-Safety, which includes supporting a wide range of consumer education programs, funding research and participating in global initiatives, as well as providing our customers with relevant information, internet products and expertise so they are better equipped to exercise reasonable care and responsibility to achieve the best value from their online experience.

Telstra welcomes the opportunity to make a submission to the Australian Parliament's Joint Select Committee (the 'Committee') inquiry on Cyber-Safety (the 'Inquiry').

In addition to the Cyber-Safety initiatives which Telstra supports and advocates, Telstra's view is that:

1. an holistic approach to Cyber-Safety is required to empower all Australians, especially children and young people, to exercise reasonable care and responsibility in their online activities;
2. the key components of an holistic approach include education, law enforcement, international co-operation, appropriate products and parental supervision;
3. a smart, ethical and socially aware online experience requires individuals to adopt responsible online behaviours;
4. effective programs are needed by Government to establish a broad sense of responsibility and community to drive this change in online behaviour;
5. the appointment of a separate Online Ombudsman is not required but such a function could be co-ordinated by the Australian Communications and Media Authority (ACMA) within the existing Australian legislative framework.

Further detail of Telstra's initiatives in the area of Cyber-Safety is provided in the Appendix.

# Introduction

The internet is an essential tool for all Australians, including children. It is an integral part of our economic and social activities, and a vast information, education and entertainment resource<sup>1</sup>. The ability to engage in the online environment provides both a skill for life and the means to acquire new skills. Advances in technology and higher bandwidth internet connections have increased our ability to connect with each other<sup>2</sup>, driven improvements in productivity, enhanced innovation and changed the way in which people communicate with one another<sup>3</sup>.

The opportunities that the online environment presents are accompanied by some risks and challenges<sup>4,5,6</sup>. The benefits of the internet are maximised where these risks can be alleviated, minimised or managed.

Telstra has a long standing commitment to helping to make the online experience better for its customers and their families. While online trust and safety has received increased public policy and media attention in recent times, it has been a focus for Telstra, BigPond and Trading Post for years.

Telstra takes this commitment very seriously. We recognise the need for every age group to have accessible information and expertise to better manage their online experience.

## An holistic approach is needed for Cyber-Safety

The internet has changed the way people work and manage their personal lives. Internet users should be empowered to exercise reasonable care and to take responsibility for their online activities, including parents helping their children to maximise the value of the internet while minimising potential dangers. The Internet is accessed by children in a variety of locations; including at home, school, libraries, cafés and via mobile platforms. Telstra believes that an holistic approach to Cyber-Safety is necessary, including education, law enforcement, international co-operation, appropriate products and parental supervision. This view is supported by a number of leading studies on the issue of Cyber-Safety<sup>7,8</sup>.

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<sup>1</sup> *Use of electronic media and communications: early childhood to teenage years*, ACMA, 2009

<sup>2</sup> *Communications Report 2008-2009*, ACMA

<sup>3</sup> *OECD Communications Outlook 2009 and Broadband and the Economy, Ministerial Background Report, OECD DSTI/ICCP/IE(2007)3/FINAL*, pp. 5-6 and *Digital Economy Futures*, DBCDE, August 2009

<sup>4</sup> *Review of Existing Australian and International Cyber-Safety Research*, Child Health Promotion Research Centre, Edith Cowan University, May 2009

<sup>5</sup> *Young People and Technology - a review of the current literature*, The Alannah and Madeline Foundation, 2009

<sup>6</sup> *Safer Children in a Digital World - The Report of the Byron Review 2008 and Children's online risks and safety - a review of the available evidence*, National Foundation for Educational Research, 2009

<sup>7</sup> *Enhancing Child Safety & Online Technologies - Final Report of the Internet Safety Technical Task Force*, The Berkman Center for Internet & Society, Harvard University, 31 December 2008

<sup>8</sup> *Click Clever Click Safe*, UK Council for Child Internet Safety, December 2009

# Co-ordinated programs and activities are needed to drive a change in online behaviour

The vast range of opportunities available to Internet users to interact with one another have exploded in recent times with the proliferation of computer networks, mobile devices, broadband connections and virtual communities. With such exciting opportunities comes the need for all Internet users to consider the implications of their use of information and communication technologies (ICTs).

All users of the Internet need to learn how to use ICTs, including mobile technologies and social networking sites, in responsible and ethical ways. This includes being aware of the possible risks while being online. Children and young people are particularly vulnerable as they know how to use computers and mobile phones, but may lack the maturity to understand the real consequences of their online behaviour and how to deal with inappropriate contact or content. In addition, children and young people need to feel confident about alerting the adults in their lives when they are feeling unsafe, threatened, bullied or exposed to inappropriate events. Parents need to be aware of the risks their children may face and the steps they can take to help ensure a better and trusted online experience for their children. Parents can assist by seeking to understand online technologies and actively use them, reducing the knowledge gap between themselves and their children.

Telstra understands concerns about the need for a cohesive, integrated contact point to investigate, advocate and act on Cyber-Safety issues. In Telstra's view this function could be co-ordinated by the Australian Communications and Media Authority (ACMA) within the existing Australian legislative framework, without the need to appoint a separate Online Ombudsman. Challenges would arise in executing such a function and in ensuring effective remedies given jurisdictional limitations in relation to content hosted offshore. In this respect, the ACMA is well-positioned to coordinate with its counterparts overseas. Cooperative and more informal processes established between industry, the ACMA and Government will ensure that these challenges can be managed quickly as they arise.

Ultimately, technology is an enabler and a positive online experience requires individuals to adopt responsible online behaviours. Existing Cyber-Safety programs by Government, industry and non-profit organisations have been working well to date but more can be done in this area. Additional resources are needed to be provided by Government to sections of the Australian community to ensure effective and co-ordinated Cyber-Safety programs. These programs need to be designed to establish a broad sense of responsibility and community in an effort to drive change in online behaviour. Focusing on the positives that technology brings to people's lives rather than the risks is an important step in achieving the most value from the online experience.

# Telstra empowers its customers to achieve a better online experience

As Australia's largest Internet Service Provider we are playing a leading role in Cyber-Safety. Telstra has been committed to providing relevant information, Internet products and expertise for many years to customers so they are better equipped to exercise reasonable care and responsibility to achieve the best value from their online experience. We work with industry, government, community organisations and internet users to help to address evolving online risks. Telstra has a range of initiatives which go beyond our customers and extend to the wider community. Examples of these include:

- the appointment of a Telstra Executive to the role of Officer of Internet Trust and Safety, responsible for Telstra's Cyber-Safety activities and who also sits on the Government's Cyber-Safety Consultative Working Group;
- the provision of tools, tips and educational information to our customers;
- offering a BigPond Security product, a comprehensive computer security solution made available especially for BigPond Members, at a reasonable cost;
- actively supporting initiatives such as Safer Internet Day, the Australasian Consumer Fraud Taskforce's Fraud Week, Privacy Week and National Cyber-Security Awareness Week;
- supporting as a key partner ACMA's Cybersmart web site dedicated to providing activities, resources and practical advice to help young children, kids, teens and parents safely enjoy the online world ([www.cybersmart.gov.au](http://www.cybersmart.gov.au));
- funding for the Telstra Connected Seniors program to help older Australians learn more about technology;
- Telstra's Computer Emergency Response Team (TCERT), which delivers a security incident response capability for both Telstra and Telstra Customers. The team responds to a variety of incidents ranging from denial of service attacks, phishing and malware compromises to unauthorised access. TCERT has developed strong relationships with other CERT's (e.g. AusCERT, CERT Australia);
- Telstra BigPond becoming an original partner of the Virtual Global Taskforce (VGT), an international alliance of law enforcement agencies working together to prevent and deter online child abuse. BigPond is the only ISP accredited as an industry partner in Australia;
- A dedicated Trading Post Trust and Safety team. Through Trading Post's Safety Centre, Help Pages, Forums and alerts we offer information to educate our customers about buying and selling safely online. We also offer our customers an opportunity to phone, email or report to us any items or transactions they are concerned about and speak about these matters with our staff seven days a week. Telstra Trading Post works closely with law enforcement and industry peers to minimise the impact of online fraud on our customers and the community; and
- a company Chief Privacy Officer and Privacy Managers tasked to ensure that business units adhere to Telstra privacy policies and procedures.

# Telstra Foundation

Since 2007, the Telstra Foundation has provided grants totalling \$1million annually to community organisations which implement programs focused on helping children and young people to build the skills to use technology wisely and effectively with an awareness of the risks of inappropriate online behaviours.

The Telstra Foundation was one of the seed funders of the Alannah and Madeline Foundation's e-smart program which is now supported by the Federal Government with a \$3million grant for a 160 school pilot. It is also a major supporter of SuperClubsPLUS Australia, the Inspire Foundation and NAPCAN's Smart Online Safe Offline programs, among others. This Telstra Foundation program focuses on building the protective factors for children and young people so they can develop their skills and enjoy the use of modern communication technologies in supported environments. The Telstra Foundation has recently announced a further \$3million commitment for another 3 years taking our total commitment to this important initiative to \$6million since June 2007.

The Telstra Foundation has funded, and is a member of, the Technology and Wellbeing Roundtable - a collaboration of the organisations it funds in this area, as well as government representatives and other leading organisations. Together they are committed to sharing knowledge and experience in this new and emerging area and to promoting the benefits technology provides to children and young people.

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# APPENDIX: Telstra initiatives in the area of Cyber-Safety

The table below captures Telstra's Cyber-Safety initiatives in the online environment.

Area of focus	Initiatives led or supported by Telstra
<p>The online environment in which Australian children currently engage, including key physical points of access (schools, libraries, internet cafes, homes, mobiles) and stakeholders controlling or able to influence that engagement (governments, parents, teachers, traders, internet service providers, content service providers)</p>	<ul style="list-style-type: none"> <li>• In the lead-up to the <a href="#">One Laptop Per Child launch</a> in March 2010 of XO laptops to rural schools across Australia Telstra proactively worked with the private company involved to ensure key Cyber-Safety messages were included on the laptop and accompanying documentation issued to students and teachers</li> <li>• As part of its ongoing education and Cyber-Safety awareness initiatives for all age-groups Telstra has: <ul style="list-style-type: none"> <li>○ Launched an <a href="#">Internet and Cyber-safety webpage</a> on Telstra.com in late 2009</li> <li>○ Distributed a <i>Telstra and Cyber-Safety</i> booklet across Telstra and to members of Australian Parliament containing hints and tips on a range of topics including cyber-bullying</li> <li>○ Published a regular blog by the Officer of Internet Trust &amp; Safety on the <a href="#">Telstra Exchange site</a>. The blog provides practical information and tangible tips on how to be Cyber-Safe for a variety of audiences</li> <li>○ Provided ongoing advice via the Ponderings newsletter and BigPond.com</li> </ul> </li> </ul>
<p>Abuse of children online, particularly cyber-bullying</p>	<ul style="list-style-type: none"> <li>• In September 2009 Senator Conroy announced Telstra would be an industry partner with the Federal Government to link Australian children, parents and teachers with expert Cyber-Safety advice and targeted information via the new <a href="#">Cybersmart website</a> created by the Australian Communications Media Authority (ACMA). Telstra has agreed to cross-promote ACMA's Cybersmart website as part of our ongoing focus to help protect Australians from cyber-bullying and invasions of personal privacy</li> <li>• Telstra/BigPond has attained the Internet Industry Association (IIA) 'Family Friendly ISP' Seal Program status. This program is designed to dovetail with the Codes of Practice by providing a visible symbol, the "Ladybird Seal" to show which Australian ISPs are compliant with the IIA Codes. It is hoped that internet users, particularly those responsible for the care of children using the internet, will take advantage of the information and tools that compliant ISPs must offer as part of the code scheme</li> </ul>
<p>Inappropriate social and health behaviours</p>	<ul style="list-style-type: none"> <li>• Telstra provides information and resources to the Australian public, not restricted to Telstra customers, about appropriate behaviour online. This ranges from informal programs such as blogging on Telstra Exchange to formal multi-year funding for community organisations from the Telstra Foundation</li> </ul>

<p>Privacy Protection</p>	<ul style="list-style-type: none"> <li>• Telstra is committed to protecting the privacy and personal information of its customers and has been so committed since privacy law was first introduced over 20 years ago</li> <li>• This commitment is demonstrated by the support that has always been given by Telstra's senior management and the fact that Telstra has in place a robust framework to ensure privacy compliance that includes amongst other things, a Chief Privacy Officer, privacy managers in every business unit, mandatory privacy training programs, privacy policies, procedures to ensure every new development is assessed for privacy impact and system enhancements to ensure that personal information is only accessed by authorised personnel</li> <li>• Telstra maintains a strong relationship with the Federal Privacy Commissioner and is well engaged with government departments and industry organisations to ensure appropriate development of law that protects personal information and privacy of individuals</li> <li>• Telstra's Chief Privacy Officer is a member of the Board of the International Association of Privacy Professionals - Australia &amp; New Zealand</li> <li>• Telstra provides information about its privacy policy on <a href="http://www.telstra.com.au/privacy/index.htm">http://www.telstra.com.au/privacy/index.htm</a></li> </ul>
<p>Exposure to illegal and inappropriate content</p>	<ul style="list-style-type: none"> <li>• As required by law, Telstra uses an access control system to restrict access to commercial content classified MA15+ and or R18+ content, which it makes available to customers on its websites or mobile platform. Commercial content classified MA15+ is only accessible to customers who have declared they are aged 15 years and over</li> <li>• Telstra customers wishing to access and purchase an R18+ classified movie from the BigPond Movies download service are required to become a member of the service. When applying to become a BigPond Movies member, a customer must provide their date of birth and credit card details which Telstra uses to verify that the customer is at least 18 years of age</li> <li>• Telstra has also implemented processes and protections to ensure that people under 18 cannot access telephone sex services. Where Telstra only provides the underlying carriage service to enable the content to be delivered then Telstra is not considered to be providing the content and is thus not required to restrict access to content classified MA15+ or R18+</li> <li>• Access to certain restricted services is limited to customers who submit a written request to Telstra and are provided with a PIN password to access these services</li> </ul>
<p>Australian and international response to Cyber-Safety threats their effectiveness and costs to stakeholders, including business</p>	<ul style="list-style-type: none"> <li>• Telstra has founding partner membership of the Virtual Global Taskforce (comprised of police forces from around the world working together to fight online child abuse) and has attained the Internet Industry Association (IIA) Family Friendly ISP status</li> </ul>



	<ul style="list-style-type: none"> <li>• Safer Internet Day is an annual international awareness day organised by Insafe – a European network of Awareness Centres – to promote safer and more responsible use of online technology and mobile phones, especially amongst children and young people. This event is managed by the ACMA in Australia and Telstra has participated every year since inception</li> </ul>
<p>Opportunities for cooperation across Australian stakeholders and with international stakeholders</p>	<ul style="list-style-type: none"> <li>• Telstra has founding partner membership of the Virtual Global Taskforce (comprised of police forces from around the world working together to fight online child abuse)</li> <li>• Telstra has committed to working with cross-industry stakeholders to tackle the various topics attached to Cyber-Safety together. ITSWC members sit on Berry Street's BeNetWise Reference Group (a 12 month project looking at young at-risk people in out of home care and their access to technology and a recipient of the Telstra Foundation's Cyber-Safety grants) and Alannah and Madeline's Cyber-Safety and Wellbeing Reference Group</li> <li>• In April 2009 Telstra announced, in conjunction with the Australian Institute of Police Management (AIPM), that it will offer the Telstra Australasian Police Scholarship to the best police course participant in the AIPM Police Executive Leadership Program. The recipient will attend Harvard University to further their understanding of the implications of information communications/the internet on society</li> <li>• Telstra is the only Telco and large ISP represented on the Federal Government's Consultative Working Group on Cyber-Safety (CWG) – and were recently reappointed for the third time. The CWG is focused on aspects that Australian children face online including cyber-bullying and exposure to illegal/inappropriate content</li> <li>• The Telstra Foundation co-chairs the Technology and Wellbeing Roundtable, a group of private sector companies, NGOs and government who see technology as an enabler for young people</li> </ul>
<p>Ways to support schools reduce the incidence and harmful effects of cyber-bullying</p>	<ul style="list-style-type: none"> <li>• The Telstra Foundation's 'Spotlight on Cyber-Safety' has funded programs specifically targeting ways that schools can combat cyber bullying including the Alannah and Madeline Foundation's eSmart program and the Loddon Mallee Cyber Citizenship program</li> </ul>
<p>Role of parents, families, carers and the community</p>	<ul style="list-style-type: none"> <li>• In 2008 the Telstra Foundation provided funds to Professor Donna Cross at Edith Cowan University to research and produce effective parent resources for families with teenage children</li> <li>• Telstra partners with Government departments on nationwide awareness campaigns including the ACMA's Safer Internet Day in February, Australasian Consumer Fraud Taskforce Week in March led by the ACCC and the Federal Government's National Cyber-Security Awareness Week in June</li> </ul>

	<ul style="list-style-type: none"> <li>Enabling devices for parental control: Telstra, via BigPond, provides a number of security products to help protect its customers from receiving inappropriate content, spam, viruses, and phishing attacks. These security products are available for businesses, parents and users alike. Information is available at: <a href="http://www.bigpond.com/internet/security">www.bigpond.com/internet/security</a></li> </ul>
Analysing information on achieving and continuing world's best practice safeguards	<ul style="list-style-type: none"> <li>The Telstra Foundation was one of the first philanthropic bodies to identify Cyber-Safety as an important issue committing \$3 million over three years to programs aiming to help build children and young people's skills online. This commitment continues with the total allocation of funds to grant increased to \$6 million over six years</li> <li>To ensure Telstra is seen as a leader in this important area, Telstra created the role of Officer of Internet Trust and the Internet Trust and Safety Working Committee (ITSWC) in October 2008. The Committee ensures Telstra coordinates all its business units' efforts in Cyber-Safety</li> </ul>
Bill shock	<ul style="list-style-type: none"> <li>Telstra works to assist customers in managing their account, but advises customers to act responsibly when using telecommunications services. Below is a list of options that we offer customers to assist them in managing their usage and avoiding high bills</li> <li>Customers are advised when changing over their devices especially to a Smartphone, that they should seek advice from Telstra to ensure they are on the most suitable plan that includes data</li> <li>Premium Services (psychic, voting lines for television, dating and chat services) are often accessed by mobile phone users. Customers can request a barring code that will prevent the ability to subscribe to these services. A spend limit can also be placed on the account to help manage costs for customers. Telstra also provides a double opt-in process that protects customers from unintentional subscriptions</li> <li>Customers can register for My Account at <a href="http://www.telstra.com">www.telstra.com</a> or <a href="http://bigpond.com">bigpond.com</a>, which allows them to access a range of online services to help manage their account, including viewing unbilled calls and data usage</li> <li>Customers can also access the "My Data Usage Meter" online. This service enables customers to have an idea of the cost of accessing information on BigPond Mobile Services such as the latest news and stock prices etc before they receive their bill. This service can also be accessed via an SMS to a specified number (standard SMS charges apply)</li> <li>Telstra has specialist consultants for customers experiencing financial hardship. This team assists customers in making appropriate payment arrangements</li> <li>Telstra also has a team in place that monitors high usage based on previous bills and endeavours to contact customers accordingly</li> </ul>

	<ul style="list-style-type: none"> <li>• Telstra has recently introduced a new suite of post-paid mobile plans for both consumers and small business that include generous data allowances. For example, for a minimum monthly spend of just \$49 customers can obtain up to 200MB of data, in addition to an included \$200 call and SMS allowance. These plans also provide SMS alerts at the 80% and 100% usage thresholds</li> <li>• Telstra offers pre-paid options for both internet and mobile phones. These options provide customers with the ability to pay as they go and only pay for what they use. They are regularly recommended to customers who require tight credit control. Among these options are a new set of Browsing Packs with significantly increased value – for instance, \$49 a month now provides 2GB of data</li> </ul>
<p>Examining the need to ensure that the opportunities presented by, and economic benefits of, new technologies are maximised;</p>	<ul style="list-style-type: none"> <li>• One of Telstra's core strengths is the ability to take communication (and increasingly media and application) technologies to market in a way to maximise economic benefit</li> <li>• The key factors underpinning this ability include: <ul style="list-style-type: none"> <li>○ Being able to work collaboratively with the telecoms and IT industry to drive development of new capabilities</li> <li>○ Picking the right moment when technologies become mature enough for deployment and further business development</li> <li>○ Picking technologies to avoid (where possible) fragmentation of standards – and hence avoid introducing additional cost and complexity into customer experiences and underlying solutions</li> <li>○ The most relevant area in this discussion is the issue of timing and solution maturity</li> </ul> </li> <li>• With regards to online safety, there are a large number of possible tools and solutions in development by a range of companies now (in particular around tools to support parental monitoring of online chat and social network services)</li> <li>• However these products are at widely varying levels of maturity and capability. Signs of maturity of an online safety product are typically either the ability to scale the solutions and surrounding support models to meet the needs of hundreds of thousands of customers, and/or the ability to deliver a simple and easy to use solution for customers to install and use (i.e. customers can easily get the benefits of the solution)</li> <li>• Telstra continues to engage with a broad range of solutions providers and review solutions in the online safety space</li> </ul>