

Productivity Commission

Submission to the interim report of the inquiry into harnessing data and digital technology

UNICEF Australia welcomes the opportunity to respond to the interim report of the inquiry into harnessing data and digital technology. The digital world is already having a profound impact on the lives of children in Australia - 84% of children will have a social media presence by the age of two,ⁱ and by age 12 every single child in Australia will be online.ⁱⁱ

Put simply, the online world is a young person's environment, and as the Productivity Commission rightly identifies, artificial intelligence (AI) is an emergent and disruptive technology. UNICEF Australia's latest research shows that the same holds true for AI and young people – AI is rapidly changing childhood in Australia.ⁱⁱⁱ

Our new paper – [Algorithmic Kids](#) – outlines five new risks and opportunities posed by AI for children. These range from new harms like deepfakes and image-based abuse, AI companions and chatbots, and AI-generated child exploitation material, to promising new frontiers in AI-powered online safety and education.

As the global AI race gathers speed, Australia has an opportunity now to put our unique stamp on this transformational new frontier. UNICEF Australia wants our country to be the international champion of child-centred AI – a global hub for innovation in safe and responsible AI for kids, mitigating its risks and maximising its opportunities. We offer a series of recommendations to put Australia on a pathway towards that vision, and some of the most relevant for this inquiry include:

1. **Utilise existing digital reforms in Australia to make them fit-for-purpose for AI, then plug any gaps with new laws and regulations** - Better protection for children's data through the Children's Online Privacy Code, and a new duty of care in the Online Safety Act to ensure digital platforms are safe, will go a long way to managing AI risks for children. Where risks are left unaddressed, new laws should be adopted;
2. **Establish an Australian AI Safety Institute, with a dedicated workstream on children** - An AI Safety Institute could lead technical research including into the impacts of AI on children, acting as a bridge between government, industry, and the public, and be a vehicle for sharing Australian innovation with the world;
3. **Integrate AI literacy into the national curriculum and raise public awareness** - We need to equip Australia's next generation with the skills to both use AI safely and capitalise on the opportunities it provides. Raising public awareness will also help parents have the confidence to safely guide their children through an increasingly AI-augmented world.

In addition to AI, the interim report also highlights privacy regulation as key area of focus. Australia is in the process of taking significant strides towards improved privacy for children, namely through the active development of the *Children's Online Privacy Code*, which will help align us with emerging international norms for regulating children's data.

UNICEF Australia has provided a [submission](#) to the consultation on the *Children's Online Privacy Code*. We know that data from children and young people is treated as a commodity - collected, traded and sold at unprecedented rates. Yet for young children, concepts like privacy can be difficult to understand, and they may unwittingly divulge information to third parties that places them at risk. Young people in Australia also care deeply about privacy – our own research found that 72% of teens are uncomfortable with their personal data being collected by apps and websites.^{iv}

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In our submission we outlined a series of recommendations that can help Australia have the strongest privacy protections in place for children and young people. Most relevant for this inquiry is our recommendation on the right to erasure:

4. **Require that entities provide a remedy which allows children to have their data erased upon request** – this is due to the unique nature of children and data. Unlike adults, consent to data collection for children is handled for them by adults until children reach an age of consent in their mid-late teens. By that age, it is estimated that advertisers will have collected 72 million data points on a child.^v The right to erasure is an opportunity to flip this power-imbalance and grant children some control over their personal data. It is also supported by international human rights law,^{vi} exists in comparable regulations such as the EU’s *General Data Protection Regulation*^{vii} and the UK’s *Age Appropriate Design Code*,^{viii} and indeed tech platforms already allow users to request the deletion of their data including Instagram, Facebook,^{ix} TikTok^x and Snapchat.^{xi}

Whether it is the emergence of AI or privacy reform, Australia has a unique opportunity now to put in place well-designed regulation which can minimise risks faced in the online world, including amongst our most vulnerable in children, and at the same time maximise the potential of digital technology for the betterment of all.

We would welcome the opportunity to expand on the ideas in this submission and again thank the Productivity Commission for conducting this important inquiry.

Warm regards,

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ⁱ CNN/Mark Milian (2010), Study: 82 percent of kids under 2 have an online presence, <https://edition.cnn.com/2010/TECH/social.media/10/07/baby.pictures/index.htm>

ⁱⁱ Bravehearts (2023), Online risks, child exploitation & grooming, <https://bravehearts.org.au/research-lobbying/stats-facts/online-riskschild-exploitation-grooming/>

ⁱⁱⁱ UNICEF Australia (2025), Algorithmic Kids: Towards child-centred AI in Australia, <https://assets-us-01.kc-usercontent.com/99f113b4-e5f7-00d2-23c0-c83ca2e4cfa2/47fb9c78-cce8-4235-b76c-4f9694208f8f/Algorithmic%20Kids%20-%20Towards%20child-centred%20AI%20in%20Australia.pdf>

^{iv} UNICEF Australia (2025), A Generation Online: Ensuring children and young people thrive in a digital world, unicef.org.au/publications/a-generation-online

^v Holloway, D. (2019). Surveillance capitalism and children’s data: the Internet of toys and things for children. *Media International Australia*, 170(1), 27-36. <https://doi.org/10.1177/1329878X19828205>

^{vi} Committee on the Rights of the Child, General comment No. 25 (2021) on children’s rights in relation to the digital environment, 86th sess, CRC/C/GC/25 (2 March 2021).

^{vii} Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

^{viii} UK Information Commissioner’s Office *Age Appropriate Design Code* 2020 <https://ico.org.uk/for-organisations/guide-to-data-protection/ico-codes-of-practice/age-appropriate-design-a-code-of-practice-for-online-services/>

^{ix} Meta 2025 *Delete your Information or Account* <https://www.facebook.com/privacy/policy/>

^x TikTok 2025 *Can a User Request to Have their Data Removed?* <https://usds.tiktok.com/can-a-user-request-to-have-their-data-removed-and-deleted-from-tiktok>

^{xi} Snapchat 2025 *How do I Clear my Data on Snapchat?* <https://help.snapchat.com/hc/en-us/articles/12324650978964-How-do-I-clear-my-data-on-Snapchat>