



TO: The Australian e-Safety Commissioner

FROM: [Common Sense Media](https://www.commonsensemedia.org)

DATE: 31 October 2025

RE: *Designing for Safety: Preventing Grievous Harm Before It Happens* Draft Report

INTRODUCTION:

Common Sense Media is dedicated to improving the lives of children and families by providing the trustworthy information, education, and independent voice they need to thrive. Our ratings, research, and resources reach more than 150 million users worldwide, over 1.4 million educators, and more than 100,000 schools worldwide every year. Backed by the research that forms the foundation of everything we do, we champion quality media that entertains and inspires, and support legislation aimed at closing the digital divide and holding social media and AI platforms accountable for their effects on minors. We encourage students and educators to think critically about technology and become responsible digital citizens. And we help safeguard children's health and well-being by supporting protection of their data privacy and reducing potential online harms.

We were pleased to be included in the e-Safety workshop in December of 2024 and are submitting these comments in response to your request for review and feedback of the *Designing For Safety: Preventing Grievous Harm Before It Happens* draft report. Common Sense Media supports the e-Safety Commissioner's efforts to share best practices and establish new areas of collaboration between the technology industry, government, academic, non-government, and civil society sectors in order to combat online child sexual exploitation and abuse (CSEA). As a trusted global brand for children and families, we look forward to helping bring American and international perspectives to consideration as the e-Safety Commissioner develops this toolkit to improve children's lives around the world - through safety by design.

COMMENTS:

We applaud the workshop for creating a strong, practical toolkit that brings Safety by Design (SbD) principles to life by addressing child sexual exploitation and abuse (CSEA). The framing of this toolkit, that safety is a *product responsibility - not a user burden* we feel to be exactly right. The clear SbD principles, tied to concrete actions like child-friendly policies and end-to-end reporting flows, make this approach actionable by small, medium, and large companies.

We also commend the Commission for the inclusion of cross-platform abuse prevention, signal sharing, start-up guidance, and low-cost tools. Too often, some of the worst harms emerge on smaller or newer platforms that lack established trust and safety teams, so this emphasis is essential. We also especially appreciate the recognition of staff wellness and trauma-informed practices—reminding us that safety must extend to both users and the professionals who protect them.

We agree with the Commission and its treatment of age assurance as a critical platform-level safeguard. Without strong, privacy-protective age assurance systems, children and teens remain at risk no matter how many parental tools or safety settings exist. We encourage further clarification of acceptable error rates, fallback procedures, and data-minimization practices. The Notice of Proposed Rulemaking for the New York SAFE for Kids Act (2024) offers a valuable model for robust age assurance that requires independent certification and measurable accuracy standards to ensure reliability and accountability.¹

We also appreciate the Commission's attention to emerging harms like AI-generated CSAM. Common Sense Media has been proud to support legislation to modernize child protection laws to cover synthetic imagery—including California's AB 1831 (2024),² New York's 2025 budget policy,³ and the federal TAKE IT DOWN Act (S.146).⁴ These laws ensure that harmful AI-generated images are treated with the same seriousness as authentic CSAM images – because victims deserve the protection of the law regardless of the medium of abuse.

On CSEA in extended reality (XR) environments, recent US Senate testimony (Sept. 2025) underscored how immersive technologies amplify harm. As witnesses Jason Sattizahn and Cayce Savage (both former employees and researchers at Meta) testified during the hearing before the Senate Judiciary Subcommittee on Privacy, Technology and the Law – titled “*Hidden Harms: Examining Whistle-blower Allegations that Meta Platforms, Inc. Buried Child Safety Research*,” users, especially women and children, face high rates of harassment

¹ <https://ag.ny.gov/sites/default/files/regulatory-documents/safe-for-kids-act-nprm.pdf>

² <https://www.common sense media.org/sites/default/files/featured-content/files/ca-csam-ai-berman-bill-one-pager-2024-updated-6.2024.pdf>

³ <https://www.common sense media.org/sites/default/files/featured-content/files/ny-ai-csam-proposal.pdf>

⁴ <https://www.common sense media.org/sites/default/files/featured-content/files/s.146-take-it-down-act-coalition-support-letter-4.9.2025.pdf>

and abuse in these XR environments, and virtual realities embodying nature makes those experiences feel deeply real.⁵ Our own 2022 research at Common Sense Media identified early warning signs around physical, psychological, and informational risks in XR. These findings reinforce the need to assess emerging technologies for child safety before they reach young users.⁶

We strongly support the Commission's call to integrate Trust and Safety and SbD into engineering education and company leadership. True safety requires cultural change - where these disciplines are embedded from the start, not added as an afterthought. A duty of care, as seen in the UK and U.S. states' Age-Appropriate Design Codes,⁷ would help ensure that safety and privacy are prioritized across all stages of product design and governance.

Finally, we couldn't agree more that safety must not rely on user reporting alone. Proactive detection and prevention are essential. As Pinterest CEO Bill Ready recently said in a New York Times interview, "Why can't we create a world where social media companies compete on their safety records?"⁸ We support that vision. The Commission's toolkit lays the groundwork for that race to the top - where companies lead with transparency, accountability, and a genuine commitment to keeping users safe.

CONCLUSION:

In conclusion, Common Sense Media commends the Commission for its ongoing leadership in advancing robust regulatory measures to protect children online. We see this draft document as a timely, actionable toolkit that can materially raise the industry floor for online safety - particularly for minors - while keeping the guidelines feasible for smaller providers.

We appreciate the opportunity to participate in this workshop. As a trusted global brand dedicated to the well-being of children and families, we are eager to continue this conversation so we can contribute our perspectives as the e-Safety Commission continues to formulate essential regulatory guidance, standards, and tools aimed at enhancing the well-being of children in Australia.

⁵ A transcript of this September 9, 2025 testimony can be found at:

https://www.techpolicy.press/transcript-us-senate-hearing-on-examining-whistleblower-allegations-that-meta-buried-child-safety-research/?utm_source=chatgpt.com

⁶ <https://www.commonsensemedia.org/sites/default/files/featured-content/files/metaverse-white-paper-1.pdf>

⁷ <https://kidscodecoalition.org/>

⁸ <https://www.nytimes.com/2025/10/26/business/pinterest-social-media-bill-ready.html>