

Submission to the Draft Children's Online Privacy Code Youth Collective Consultation

June 2026



"I honestly never really gave that much importance to privacy before these sessions. I realised I would just blindly give so much information like my name, email address, my age, date of birth, and I wouldn't think twice about it. I just do it because I guess it's fairly normalised. Now that I think more about it, I wonder - is it really the best thing that they have access to so much information about me?"

- Jovia, 15

INTRODUCTION

“In times like these where young people are excluded from conversations involving them, consultations like these matter. They matter because they include young people at the heart of decision-making. As a result, the final Children’s Online Privacy Code will offer more authentic and insightful privacy laws that young people can understand, because they have been part of their development.”

- Anju Dhanushkodi 19, co-author

This report presents findings from a youth-led consultation on the Office of the Australian Information Commissioner’s (OAIC) Draft Children’s Online Privacy Code (the Code). The consultation was designed and co-facilitated by members of PROJECT ROCKIT’s Youth Collective and involved over 50 young Australians across four online sessions held in May 2026.

This submission is made on behalf of the PROJECT ROCKIT Youth Collective.

PROJECT ROCKIT is a national youth-driven movement that ignites bravery in youth voice. PROJECT ROCKIT’s Youth Collective is a core element of that movement, alongside an Impact Network of hundreds of youth advocates committed to upholding and advocating for the rights of young Australians.

OUR PROCESS: WHY THIS CONSULTATION IS DIFFERENT

Most consultations with young people follow the same pattern: adults design the questions, adults run the sessions, and young people are invited to share their experiences. This consultation did something different. It took the materials developed by the OAIC and allowed young people to further interrogate and consider how to best present these to groups of their peers. As a result, PROJECT ROCKIT's Youth Collective were involved at every stage of this process detailed below.

CONSULTATION DESIGN PHASE (NOV 2025 - MARCH 2026)

Members of the Youth Collective engaged with the OAIC team in consultations and co-design leading into the consultation phase of the Code. They informed the consultation design and helped shape the language and approach to engage children and young people in the consultation process. This provided them with a background in the Code and the concepts that surround it. This gave them the knowledge and skills to undertake further design steps and to lead their own consultation process.

DESIGN PHASE (APRIL 2026)

The group of the young people from the Consultation Design Phase used the OAIC materials to co-design their own consultation methodology, scenarios, discussion questions and structure across two design sessions in late April. They made the decision to group the rules within four thematic areas and took the already improved language further translating the 14 rules into themes, topics and authentic situations faced by young people.

CO-FACILITATION PHASE (MAY 2026)

The young people then co-facilitated each of the four consultation sessions alongside PROJECT ROCKIT's team. They led discussions, held space for honest conversation, and created an environment where other young people felt safe and heard.

DATA ANALYSIS AND REPORT WRITING (MAY-JUNE 2026)

This final data analysis also involved members of the Youth Collective, and informed this report that was developed and co-written with Anju Dhanushkodi, a senior member of the Youth Collective. Anju had attended and observed the conversations and played an instrumental role in bringing a young person's perspective to the final data analysis.

"In my time at PROJECT ROCKIT, I've seen many young people take charge and this time was no different. It was a joy to see younger members of the Collective co-facilitating and developing a rapport with the group. During the consultations, I was happy to simply observe and hear from young people from all corners of Australia: the ones who attended a distance school, the ones who had a tech advocacy background and the ones who were reshaping what privacy meant to them. I found that when young people were leading the conversation, others became more comfortable sharing their thoughts, perhaps because they could relate to each other. All of the members were passionate, inspired and empowered. They bounced off each others' ideas, challenged existing notions and dreamt of new ones. It was truly an honor to be in such a space."

- Anju Dhanushkodi, 19, co-author

PROJECT ROCKIT'S REFLECTION

We believe that a model, where young people are designers and facilitators, not just participants, should become the standard for any government consultation that affects young people's lives. The Privacy Commissioner and their team should be congratulated for the child and youth-centred approach they have taken to the consultations around the Children's Online Privacy Code; it has demonstrated that a government agency or department can create the time and spaces for effective and appropriate consultation with citizens of all ages. This qualitative consultation is an extension of the work OAIC have done during the Code's development.

WHO WAS INVOLVED

YOUTH CO-FACILITATORS

The following young people from PROJECT ROCKIT's Youth Collective designed and co-facilitated the consultation series:

- Kris, 16 | Co-designed session questions, facilitated Session 1 & 4
- Jovia, 15 | Co-designed session questions, facilitated Session 1 & 3
- Darcey, 15 | Co-designed session questions, facilitated Session 2 & 3
- Vedrana, 16 | Co-designed session questions, facilitated Session 1 & 2
- Maxine, 15 | Co-designed session questions, facilitated Session 2 & 4
- Taihan, 18 | Co-designed session questions, facilitated Session 1
- Ayush, 17 | Co-designed session questions, facilitated Session 3
- Theo, 17 | Co-designed session questions

The co-facilitators were supported by Dan Donahoo, Head of Projects (PROJECT ROCKIT) and Anju Dhanushkodi (Senior Collective member & researcher).

CONSULTATION PARTICIPANTS

A further 45 young people participated across the four sessions. They were recruited through *PROJECT ROCKIT's Impact Network*. All participants were aged 18 years or under.

SESSION OVERVIEW

The consultation consisted of four sessions in May. The session design incorporated the different rules and aspects of the Code across four topic areas.

- Session 1: Trust & Access | 5 May 2026 | 13 participants
- Session 2: Control & Deletion | 7 May 2026 | 12 participants
- Session 3: Tricks & Tracking | 11 May 2026 | 12 participants
- Session 4: When Things Go Wrong | 13 May 2026 | 10 participants

WHAT YOUNG PEOPLE TOLD US ABOUT THE CODE

Throughout the consultations, young people offered a wide range of insights for the entire code. However, we noticed certain themes repeatedly emerged during our sessions. We also identified that there are aspects of the code and the rules as described in the consultation material that young people did not have significant interest in or ability to feedback on. To reflect this, we've kept our focus on the most important parts of key rules that young people wanted adjusted.

THEME: PERSONAL INFORMATION

REFLECTING RULES 2 and 3

"They should only really need that information to be able to say, are you over the age requirement for this game or not? They should not need that for any other reason, and that information should be deleted from their system, in my opinion, once they've verified that."

- Ayush, 17

YOUNG PEOPLE'S THOUGHTS

- Young people expressed that once personal documents had fulfilled their required purpose, they should be deleted. While this refers to common age verification documents, such as birth certificates, it also refers to newer forms, such as selfies.
- Participants recognised that the code only required *sensitive information* be destroyed, and reasoned that this is subjective to each company, and technically, any other information collected has the potential to be retained indefinitely. Especially given many of these terms are written in the terms and conditions (which are notoriously unread) young people didn't want any risk of information being shared, and wanted to close this loophole entirely.
- Young people identified the term *strictly necessary* information as being unnecessarily broad. For example, only 'needed' to be limited to country, not specific address, age verification needs year of birth, not date of birth and address/behaviour tracking is not required

- Third-party data sharing must be explicitly off by default, not just implied by *strictly necessary*. The code requires minimal collection but does not explicitly state that sharing children's data with advertisers, analytics companies, and third-party processors is a non-default activity requiring affirmative opt-in.
- Young people were shocked to learn that accepting one platform's terms could mean dozens of companies accessing their data

"Privacy responsibility is placed heavily on users, even though platforms are designed by teams with behavioural scientists to optimise those influential decisions. They expect young people to constantly navigate that power imbalance. Are they robbing us of our autonomy?"

- Kris, 16

KEY TAKEAWAYS

- Young people must be clearly aware and autonomous over the information they share, and the extent of the sharing
- Young people don't like knowing platforms retain access to their personal information

"When you give it to big tech companies and the government, you don't really know what they're going to do with it. Even if you do give consent, it's still dangerous - they could use it for a survey, but then they could also use it for many other things, and you just don't have it in your control anymore."

- Emily, 13

FINAL RECOMMENDATIONS

- Young people recommended the destroy-after-verification apply to ALL personal information collected during age-checking purposes, not just sensitive information
- The code should also specify that any biometric data used for verification requires additional safeguards and explicit consent, separate to the service's general consent
- The default setting should not allow data to be shared beyond the primary service, unless the child (or parent/carer for under-15s) actively enables each specific sharing arrangement

THEME 2: CONSENT

REFLECTING RULE 5 and 7

"You have full rights at 16 - you're just not considered an adult until 18. So that's why I'm thinking maybe full control over data at 16, to not only match with the social media ban, but also match with the full rights law."

- Hannah, 13

YOUNG PEOPLE'S THOUGHTS

- Young people identified that there was an inconsistency with age of consent, with some platforms requiring the age of consent to be 15 and the nation-wide social media ban requiring users to be 16 and above.
- Young people identified the current code covers legal and health support, but not situations where the parent or carer is the source of harm to the child. In certain circumstances (family violence orders / child protection proceedings), the standard parental consent pathway gives an unsafe adult access to a child's data
- Consent must be regulated, not just required
 - The Code requires consent for data collection, but is often misleading, with deliberately confusing interfaces to encourage the user to press "yes."
 - Young people wanted consent option interface to be equal and accessible
 - Accept and Reject buttons must be the same size, color and design
 - In addition to text, interfaces must be available in visual, audio and interactive formats for younger children
 - Consent should not be misleading (e.g. encouraging people to consent to cookies by labelling them as 'essential')

KEY TAKEAWAYS

- Consent must be clear, easy-to-understand and consistent across all platforms
- Young people want consistency in age limits and consent

"Consent is freely given, and it is reversible — it is always, always reversible. I hate the fact that often you have to jump through hoops, or I've had to delete accounts because I physically cannot take away my information without just removing my account entirely. Consent is always, always reversible at any point in whatever situation, and it especially should apply to the digital world."

- Theo, 17

RECOMMENDATIONS

- Age-appropriate notice must be genuinely catered towards children, in child-friendly language and accessible formats (audio/video)
- Domestic Violence and coercive control must be an explicit exception to the standard parental consent mechanism.
- Regulate consent by adding specific list of prohibited design practices for consent rather than relying on general principles
- Giving young people the power to revoke their consent, without the risk of account deletion

"I think it's also deceptive that they're calling them cookies — making it sound like such a carefree, calm thing when they could actually be stealing your data. Even then, if you click 'essential cookies' may be the exact same as regular cookies, because it never specifies what the essential ones are needed for. If you can reject all cookies and everything still works perfectly fine - what are the essential ones?"

- Darcey, 15

THEME 3: DUTY OF CARE

REFLECTING RULE 9, RULE 12 & RULE 13

"I feel like just being more open and transparent about our data and what it can be used for can make these tough conversations easier to have — because it's clear on why they have our information in the first place, and not to have to theorise why they even need it."

- Sophie, 14

WHAT YOUNG PEOPLE SAID

- Young people expressed a common sentiment: that no one actually reads the terms and conditions, because it's essentially designed to be purposely long and in legalese.
- They expressed the options to access privacy policies usually result in a difficult journey on the app interface. Instead of lengthy and often confusing terms and conditions, young people proposed a standardised set of plain language yes/no questions
 - For example: "Is data stored overseas? Is it used to train AI? Are my biometrics being collected?"
 - They added this would allow users to compare services and make informed choices, without reading the entire policy
- Young people valued Apple's location model: periodic reminders every few months that an app has been accessing location, with a simple option to change settings immediately.
- The current Code is too vague, and it should require that notification is repeated at regular intervals while tracking remains active and not just at initiation
- Young people also told us that parental tracking is not always protective. They said location tracking can be a tool of coercive control in domestic violence situations, and that the code should acknowledge this difficult reality
- Young people told us that a genuine complaint system must be findable within 30 seconds from inside the app, written for a 13-year-old, anonymous where needed, and must visibly result in outcomes. This is the single change most likely to increase children's actual use of the system.

"I think Apple does it really well, where every few months on an app, it'll be like, 'this app is still using your location - are you aware, do you want to change your settings?' I'd love that to be more frequent and across all apps. Every few months it should be like, 'hey, this app has been using your location for a while - you still chill with that?' I feel like that should be how it operates."

- Theo, 17

KEY TAKEAWAYS

- Young people want consequences for their complaints, or at the very least, ensure they are being heard
- Privacy policies must be something that clearly informs young people what they are getting into, rather than something to skip over
- Young people want to control who has access to their location

RECOMMENDATIONS

- The child-friendly privacy policy must proactively disclose - in plain language - whether and how the service uses automated decision-making on children's data, without needing a request
- Child-friendly privacy policies must be easily accessible in all interfaces
- Introduce a standardised set of plain-language yes/no questions that every service must answer publicly in its child-friendly privacy policy
- Require periodic, on-going tracking notification when someone can see their location
- Require all platforms covered by the Code to include a prominent, in-app complaint pathway written in plain language for children, within simple navigational steps

"What are the best interests of young people? I think this boils down to two essential things: convenience - it should be easy for us to access what we need without a hundred different processes - and protection. Our information should be kept safe, it shouldn't be exploited, and we shouldn't even be compelled to give this information in the first place unless it's absolutely necessary."

- Jovia, 15

PRIORITY RECOMMENDATION: YOUTH-LED EDUCATION MATERIALS

"On the topic of educating young people on privacy - knowing that this code will eventually be finished - does anyone have any ideas on how this information should be relayed to young people, so that they are aware of the autonomy that they have now gained?"

- Maxine, 15

Of all the changes we are recommending, we want to highlight one as the most urgent and the most likely to make a real difference in young people's lives: the Code must be accompanied by a youth-led education campaign that helps children and young people understand their rights.

WHY EDUCATION IS NON-NEGOIABLE

Across all four sessions, young people consistently told us that they had never heard of many of the protections we discussed. They did not know that some apps are legally required to let them delete their data. They did not know they could complain to a government body. They did not know that "essential cookies" is a term that can be legally questioned.

"While some participants knew about their existing digital rights, others found out during the session itself. As an observer, I saw their reactions first hand. They were confused that they didn't know these laws existed, indignant that no one told them and angry at being excluded once again. As a youth advocate, it's unfortunately familiar to me to see young people being left out of spaces. This time, it was even more heartbreaking to see them unaware of their own legal rights, simply because no one thought to tell them. It's also important to note that PROJECT ROCKIT's Youth Collective and Impact Network are individuals already predisposed to be interested and passionate about these issues. The average teenager might never seek out this information, and may live their entire childhood navigating a digital world unaware of their online legal rights."

- Anju Dhanushkodi 19, co-author

WHY IT MUST BE YOUTH-LED

Young people engage with information co-designed and co-created by other young people differently from information designed by adults. Peer-designed and created content feels relevant, credible and actionable.

“As someone on the other side of high school, I remember being most engaged by workshops being run by young people. There was no slideshow or worksheets, but there was a deep understanding. Educational resources that mirror this can be powerful and must be accessible. Content should be available online, in video and text format, in multiple languages and disability-friendly. However, I’d like to reiterate what may be genuinely useful to young people today, may not resonate with young people tomorrow. Just as young people, social media platforms and rules change, education must change with it. The Code and its caretakers should ensure that the youth-led education materials are properly understood by young people, and applicable to their everyday life. “

- Anju Dhanushkodi 19, co-author

Young people across all four sessions - without exception - said they had never heard of many of the protection and concepts we discussed. They did not know they could ask for their data to be deleted. They did not know they could complain to a government body. They did not know that "essential cookies" could be rejected. They did not know their school photos could potentially have been scraped into AI training datasets.

Youth organisations with existing trust relationships with young people should be funded to deliver ongoing privacy rights education through channels young people already use. The OAIC website and school curricula are not completely sufficient. PROJECT ROCKIT's experience delivering this consultation demonstrates what is possible when young people are genuine participants in the process. Funding similar organisations to deliver ongoing education - not a one-time launch campaign - is the only model with a realistic chance of building the generation-wide digital rights literacy that the creation of a Children's Online Privacy Code demands for Australia.

WHAT WE ARE RECOMMENDING

We recommend that the OAIC commit to:

1. **Commissioning a youth-led design process for Code education materials** - with young people as designers and creators, not just reviewers
2. **Partnering with youth organisations to deliver these materials** through channels young people already trust - not just school curricula
3. **Requiring platforms covered by the Code to actively promote awareness of children's rights and complaint pathways** - in plain language, inside the app, at the point of use
4. **Building in a review cycle - involving young people - to update education materials** as technology and platform behaviours change

“Being a young person in this day and age is hard. In addition to figuring out ourselves, we’re also figuring out the world around us, much of which is not built with us in mind. Navigating a constantly evolving digital world, especially with the rise of AI, is challenging. As a senior member of the Collective, it’s been fascinating for me to witness first-hand how young people plan on traversing these changes. It has been incredibly heartening seeing OIAC’s inclusion of youth perspectives, which I have no doubt will enrich the final code.”

- Anju Dhanushkodi 19, co-author

CONCLUSION

The most important takeaway is to understand young people are willing and capable to have conversations about their future. All participants in the consultations were more than happy to facilitate and co-design, and some were even surprised their opinion was being asked in the first place. They are the first to understand what it's like to be a young person, and they wanted to be more involved in discussions surrounding them. We applaud the OIAC's decision to include youth voices in the Code through processes that respect the different requirements relating to time and language and approach and process. We sincerely hope that this is only the beginning of a future where youth policy is youth-led.

We are grateful to the OAIC for its commitment to meaningful youth consultation in the development of this Code. Unlike previous digital policy processes, this one asked young people before the final decisions were made - and that matters. We hope this report demonstrates what is possible when young people are trusted as designers, facilitators and co-authors of the policies that shape their lives.

PROJECT ROCKIT and the young people involved in this consultation remain available to contribute to further development, implementation planning, and review of the Code.

PROJECT ROCKIT is Australia's youth-driven movement igniting bravery in youth voices to support young people to lead a positive impact in their communities. Learn more about our work at www.projectrockit.com.au.