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Submitted by upload to <https://www.infrastructure.gov.au/have-your-say/modernising-and-harmonising-classification-standards>

## Modernising and harmonising classification standards

Relationships Australia welcomes the opportunity to provide feedback on proposals to improve the standards that are used to guide classification decisions about films, computer games and certain publications. Relationships Australia's interest in this inquiry relates to:

- the prevalence of domestic, family and sexual violence among our clients
- our understanding of the impact, among our clients, of:
  - social determinants of health
  - intersectional disadvantage and marginalisation, and
  - circumstances of vulnerability
- our commitment to preventing harm, and enhancing public health, and
- our increasing involvement in delivering community-based mental health and social connection services and programs to meet needs that are unmet by specialist mental health services.

This submission is informed by the review paper prepared by the Social Research Centre and Mettlesome, and by submissions made by Relationships Australia in consultation processes concerning gambling, online gaming, child safety and child development, domestic and family violence, and alcohol advertising. These submissions are accessible at <https://www.relationships.org.au/research/#advocacy>

### The work of Relationships Australia

Relationships Australia is a federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others.

Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people, in all their diversity, to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. Our services include:

- individual, couples, and family counselling
- family law counselling, mediation and dispute resolution
- Specialised Family Violence Services
- Children's Contact Services (services which provide supervised contact and changeovers for high risk families)
- post-separation services for parents and children

- services designed for men, including programs to support parenting capacities and resources, Men’s Behaviour Change Programs, and tailored programs such as the Respectful Relationships Program for Indigenous clients
- parenting capacity programs
- services to support those adversely affected by harmful use of alcohol and other drugs
- gambling help services
- mental health services and program, including suicide prevention, Headspace services, and Family Mental Health Support Services
- therapeutic and case management services to applicants for Redress Support Services, Forgotten Australians, Forced Adoption Support Services, Intercountry Adoptee Family Support Service, and Post Adoption Support Services
- a range of tailored services for older Australians, including senior relationship services, elder mediation, elder abuse case management and mediation, social connection services and mental health services in residential aged care on behalf of Primary Health Networks in South Australia, and
- employee assistance programs.

For more than 75 years, we have worked with our clients to enhance not only family relationships, but also relationships with friends, colleagues, and across communities.

## Framing principles of this submission

### Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all.

### Principle 2 – Commitment to inclusive and universally accessible systems and services

Relationships Australia is committed to universal accessibility of systems and services. This requires government systems and community services to be inclusive and culturally safe services. Our clients (and staff) experience stigma, marginalisation and exclusion arising from diverse circumstances and positionalities. None of these exists at the level of an individual or family. They become barriers to full enjoyment of human rights and full participation in economic, cultural, and social life through the operation of broader systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals)
- policy settings that inform programme administration, and

- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

### Principle 3 – Fragmentation causes harm

Relationships Australia National Office consistently identifies fragmentation of systems (including legal and regulatory systems) as a principal barrier to authentic accessibility. Forcing families to shoulder the burden of navigating fragmented systems such as classification and online safety systems is the opposite of trauma informed and person-centred, and undermines human rights. Multiple inquiries have found that people are harmed by fragmentation.

### Principle 4 – An expanded understanding of diverse ways of being and knowing

Our commitment to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing. Relationships Australia is committed to working with Aboriginal and Torres Strait Islander people, families and communities, including by respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people as foundational to policy and programme development, as well as service delivery and evaluation. Relationships Australia is also committed to enhancing the cultural responsiveness of our services to other culturally and linguistically marginalised individuals, families and communities.

### Principle 5 - Prevention is key to disrupting harmful behaviours

Intergenerational patterns of engaging in harmful behaviours must be disrupted to achieve major strategic goals including ending gender-based violence within a generation, preventing child sexual abuse, and ending abuse and mistreatment of older adults.<sup>1</sup> Harm prevention anchors the achievement of multiple Government health and social policy commitments and priorities. It is a prerequisite of Australia's long-term economic success, boosting labour market and education participation while also lowering avoidable expenditure on health and social services.

## Overarching comments

Relationships Australia supports:

- greater alignment of classification policy and regulatory settings with evidence; particularly, evidence about harm to children and young people, and
- improved clarity of the relationship between the National Classification Scheme and the *Online Safety Act 2021* (Cth).

However, we note that the availability or otherwise of evidence is contingent on the availability of funding for research to collect and evaluate that evidence. Accordingly, we would caution

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<sup>1</sup> See, eg, the National Plan to End Violence Against Women and Children 2022-2032, the National Framework for Protecting Australia's Children 2021-2031 (Safe and Supported), the National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030 and the National Plan to End Abuse and Mistreatment of Older People 2026-2036.

government against drawing firm conclusions on matters such as causality and association from an absence of evidence.

## Comments on proposals

Proposal	Relationships Australia response
<b>C01</b> Introduction of a PG13 rating	Support, to promote the utility of the Scheme.
<b>C02</b> An overhaul of the Themes classifiable element to include relevant categories and remove legacy inclusions.	Relationships Australia <b>recommends</b> that new categories should include domestic and family, as well as sexual violence, suicide, <sup>2</sup> self-harm and mental illness, discrimination (including bullying), gambling, extreme misogynistic content, gendered hate speech and hate speech more broadly. These would better align the Scheme with community concerns and broader public policies which are served by the Scheme, including those relating to gender-based violence, <sup>3</sup> mental ill-health, the erosion of social cohesion, and the prevalence of gambling harm. <sup>4</sup> <b>(Recommendation 1)</b>  Relationships Australia supports scariness as a classifiable element, and removal of genre descriptions.
<b>C03</b> Evidence of harm (or lack of harm) should prevail over community sentiment.	Support in principle
<b>C04</b> The classification guidelines could be updated to remove the harsher judgement of video games' interactivity, except when it comes to real-world replication.	Support in principle.
<b>C05</b> Adjusting MA15+ to MA16+.	To support transparency, minimise unnecessary fragmentation, and ensure that policy settings are grounded in evidence, Relationships Australia <b>recommends</b> that Government clarify the evidence base underpinning the age threshold for the social media ban, as well as ensuring that age thresholds serving substantially the same purpose be consistent. <b>(Recommendation 2)</b>

<sup>2</sup> See, eg, the National Suicide Prevention Strategy 2025, accessible at <https://www.mentalhealthcommission.gov.au/national-suicide-prevention-strategy>

<sup>3</sup> See the policy documents identified at footnote 1.

<sup>4</sup> Community concern about gambling harm was extensively evidenced in the Murphy Report, 2023.

<p><b>C06</b> Aligning classification of publications to match other media (G, MA16+, R18+, X18+)</p>	<p>Support, to mitigate fragmentation and support more cohesive classification policy.</p>
<p><b>C08</b> Except in cases involving depictions of sexual violence or non-consensual acts, sexual content should be rated consistently, regardless of the artistic style or identities of those involved.</p>	<p>Support in principle.</p>
<p><b>C09</b> An Advisory Council formed from community representatives to inform decisions.</p>	<p>Do not support.</p> <p>When viewed collectively, the proposals:</p> <ul style="list-style-type: none"> <li>• indicate that the Board is misaligned with community expectations<sup>5</sup></li> <li>• to overcome that deficit, propose an additional, potentially duplicative government body, and</li> <li>• suggest increased reliance on auto-classification.</li> </ul> <p>If the Board is not working, the remedy is to change appointment processes and better target ongoing and training of Board members. Simply adding a new government entity will exacerbate existing fragmentation and resultant lack of clarity, in the community, about the classification system. It will also add to the costs, to taxpayers, of the classification system.</p> <p>Further, if the Government expands auto-classification, as proposed, it seems additionally difficult to justify the addition of another government body.</p> <p>Finally, if that Board is not, as the paper suggests at C12, capable of or empowered to provide informed advice to government, then we recommend that Government consider re-shaping the Classification Board to meet that need, rather than adding a new entity to an already complex and fragmented policy and regulatory environment. <b>(Recommendation 3)</b></p>
<p><b>C12</b> Self-classification as default.</p>	<p>The proposals suggest establishing a new body while diminishing the role of the existing Classification Board to the point where there must be a question over whether it serves any purpose at all. Meanwhile, it appears that</p>

<sup>5</sup> Notwithstanding its 2025/2026 Corporate Plan on a page, accessible at <https://www.classification.gov.au/sites/default/files/documents/classification-25-26-corporate-plan-on-a-page.pdf>

	<p>industry is suggesting, and the reviewers accepting, that self-classification would not be influenced by its own biases – including the profit motive. This seems unlikely.</p> <p>Relationships Australia <b>recommends</b> that rather than establishing a new body, rendering an existing body almost functionless, and allowing industry to substitute its own biases for the actual or perceived biases of the existing Board, Government consider re-constituting the Board to ensure it is equipped with the requisite knowledge, expertise, experience and independence to make evidence-informed judgements and meet the objectives of the Scheme. (<b>Recommendation 4</b>)</p>
<b>C14</b> Expanding the use of automation and self-classification tools	See response to C12.
<b>C15</b> The website could be updated and refreshed to always show (if the data is available in the current guideline era) the classification matrix....	Support, as promoting transparency and supporting users to find accurate, current information.
<b>C16</b> The classification website could allow users to create accounts and set personalised preferences for themselves or those they care for.	Support, as promoting transparency and supporting users to make informed decisions.
<b>C17</b> The website could be updated to provide one listing for a title...	Support
<b>C18</b> The website could show a log of the questions, concerns and decisions raised/made by the Classification Board or Review Board for listings, especially where classifications were contentious.	Support
<b>C19</b> The website could display a summarised dashboard of community input from these groups on content listings and provide additional links to their resources as well as those of other organisations, such as eSafety.	Relationships Australia has concerns about how government would select which input/perspectives to platform (and not platform) were this proposal adopted. Decisions on this could consume considerable amounts of taxpayer resources while opening up avenues for unhelpful politicisation of classification decisions. Relationships Australia would, however, support provision

	of links to other government resources, such as information from the eSafety Commissioner.
<b>C20</b> Icons could be implemented to highlight the most important and highest rated classifiable elements (e.g. Nudity, Violence, Sex) in a given media.	Support in principle. Careful design and consultation would be required to arrive at appropriate, helpful, trauma-informed and culturally sensitive icons.
<b>C21</b> Classification titles could come with an option to quickly access the title listing on the classification website, via QR Codes (or similar technology) for easy scanning.	Support in principle, subject to the availability of accessible options for people living with disabilities and people experiencing digital exclusion and marginalisation.
<b>C22</b> A public campaign to remind Australians of the purpose and functionality of the classification system could be implemented.	Support in principle

## Conclusion

Thank you again for the opportunity to contribute to ensuring that the National Classification Scheme is fit for purpose, meeting contemporary needs and expectations, and grounded in robust evidence. Should you wish to discuss any aspect of this submission or our broader work, please do not hesitate to contact me at [ntebbey@relationships.org.au](mailto:ntebbey@relationships.org.au) or our National Policy Manager, Dr Susan Cochrane, at [scochrane@relationships.org.au](mailto:scochrane@relationships.org.au).

Kind regards



Nick Tebbey  
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## References

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