



Australian Code of Practice on Disinformation and Misinformation: 2025 Review

The Alannah & Madeline Foundation (the Foundation) welcomes the opportunity to participate in the review of the Australian Code of Practice on Disinformation and Misinformation (ACPDM).

The Foundation is a leading national not-for-profit charity dedicated to keeping children and young people free from violence and trauma. We support young Australians to recover and heal from trauma; we empower them to become positive digital citizens and change the culture of bullying; and we advocate for their rights in digital environments.

Digital technologies are ever-present in the lives of most Australian families. For example, research we commissioned this year found that 84% of Prep/Foundation students already use a tablet, while 45% use a smartphone (not necessarily their own) and 34% use a laptop. Children's prolific engagement with digital technology makes exposure to inaccurate information likely. A recent [survey](#) by UNICEF found that 56% of Australian teens believed they had seen deepfake content, while a [study](#) by Western Sydney University found that 25% of Australian teens had recently seen a news story on social media which they later found out was untrue.

The Foundation is proud to work with the Australian Government to make our eSmart digital literacy products available for free to all schools, including the [eSmart Media Literacy Lab](#). However, as children's exposure to content is shaped by design and operational aspects of digital technologies – for example, the targeting of content to users based on their personal information – we believe systems change is also needed.

We are not best placed to comment on most matters raised in the discussion paper but wish to respond to the question 'What role (if any) can the Code play in facilitating an eco-system approach to combatting misinformation and disinformation?'

The discussion paper suggests various approaches which could be adopted to engage other sectors in addressing dis- and misinformation in their own work eg. advertising companies, political parties, traditional media. Such approaches could certainly have value. However, we believe an 'eco-system' approach should also involve locating the ACPDM within the context of other regulatory interventions – notably those prompted by legislation and led by publicly-funded regulators – which work to uphold the rights of Australians online, including children.

Other relevant regulatory interventions include:

- The Australian Privacy Act 1988 and the promised Children's Online Privacy Code (2026), which set limits about what companies may do with children's personal information.
- Reforms led by the Department of Industry, Science and Resources to make Australia's regulatory system fit for purpose in relation to generative AI. These reforms include the Voluntary AI Safety Standard, which guides organisations to establish systems for accountability, risk management, data quality and provenance, testing and monitoring, human oversight and user empowerment. A complementary set of mandatory guardrails for AI in high-risk settings has been proposed, which would require preventative measures in relation to testing, transparency and accountability.

- Systems-level interventions to address risks and harms to children through 'deepfake' content. These include a recent commitment by the Australian Government to work with industry to prevent the surfacing, selling or distribution of 'nudify' apps via digital platforms, as recommended by the review of the Online Safety Act 2021.

We believe the ACPDM, as a voluntary and industry-led initiative, would gain stronger credibility if its guiding principles and objectives included explicit, appropriate alignment with relevant public regulatory mechanisms such as those above.

Such a framing would demonstrate a clear commitment by industry leaders to working productively with government and regulatory bodies which have a public mandate and a responsibility to prioritise the best interests of children.

We would be delighted to discuss this matter further with you.

Please contact:

