

A MULTI-STAGED FRAMEWORK FOR CHILD DIGITAL SAFETY, WELLBEING AND GOVERNANCE



Protecting Minors From Harmful Online Content in New Zealand

Developed and presented by Our Kids Online
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1. Purpose & Context

Four-Stage Model that seeks to address the issue of minors (under 18) being exposed to harmful and illegal content online, in Aotearoa New Zealand, as detailed in Our Kids Online's Submission to the Education and Workforce Committee, dated 27 July 2025 (see Appendix A).

2. Overview of the Four-Stage Model

- **Stage 1: Network-Level Safety Controls**
Baseline protections at the the point of internet access - **The NZ Child Internet Safety Act** (see Appendix B).
- **Stage 2: Application-Level Safety Controls**
Safeguarding within social media, gaming and messaging platforms - **The App Ratings & Access Control Framework Proposal** (see Appendix C).
- **Stage 3: Dedicated Mental Health Support Access for minors (under 18)**
Guaranteed age-appropriate mental health support independent of social platforms - **YouthConnect NZ** (see Appendix D).
- **Stage 4: Centralised Online Safety Organisation**
A multi-agency centralised hub for education, prevention, support, reporting and enforcement (see Appendix E).

3. Network-Level Safety Controls

3.1 Role & Scope of Stage 1

- To protect minors (under 18) from exposure to harmful and illegal online content by requiring the implementation of age-appropriate internet filtering, parental controls and responsible oversight by internet service providers (ISPs), public networks, and device manufacturers.
- The scope includes filtered SIM cards and connectivity, filtering public and private Wi-Fi, foundational protections for minors (under 18).
- Ensures safety by default, like the automated manufacture and installation of seatbelts. Parents, whānau and caregivers should not need to worry about complex setups or adjustments. Keeping children safe should be as simple as a fastening a seatbelt - "make it click".

3.2 Breakdown of Proposed Solution

The Child Internet Safety Act (Appendix B).

3.3 Dependencies and Limitations

Acknowledges limits of network-level controls and introduces shift of risk to apps and platforms.

4. Application-Level Safety Controls

4.1 Rationale for Stage 2

- Minors (under 18) primarily interact within apps.
- Network filtering cannot govern platform design or behaviours.
- Builds on the NZ Child Internet Safety Act (NZCISA) and closes the critical gap remaining with messaging, gaming and social media apps, by establishing a national app-classification framework that does not rely on platforms or global app stores, instead using the filtered SIM cards, device-level filtering, and public network controls mandated under NZCISA.

4.2 Scope of Stage 2

- Social media.
- Messaging platforms.
- Online games.
- Rating process.

4.3 Breakdown of Proposed Solution

App Ratings & Access Control Framework Proposal (Appendix C).

4.4 Dependencies and Risk

- Reduced access to platforms may remove peer support for vulnerable minors (under 18).
- Risk of isolation, distress, disengagement, depression, radicalisation, suicidal ideation, suicide,
- Need for intentional, safe alternatives.

5. Dedicated Mental Health

5.1 Rationale for Stage 3

- Safety controls must not remove access to help.
- Minors (under 18) need trusted, age-appropriate, always available support.
- To ensure that minors (under 18) continue to be able to access essential mental health support from NGOs and agencies in lieu of access to support groups on messaging, gaming and social media apps rated 18+.

5.2 Role & Scope of Stage 3

- Independent access to mental health support.
- Designed specifically for minors (under 18).
- Operates alongside filtering and rating restrictions, not in place of connection.

5.3 Breakdown of Proposed Solution

YouthConnect NZ (Appendix D).

5.4 Relationship to Stages 1 and 2

- Mitigates unintended harm from access restrictions.
- Acts as a safety net during periods of reduced platform access.
- Provides minors (under 18) with access to regulated health providers.

6. Centralised Online Safety Organisation

6.1 Rationale for Stage 4

- To provide the nation with a 'one-door' hub for education, prevention, support, reporting and enforcement for all matters relating to online harm.
- Fosters cohesion between agencies and professionals.
- Streamlined public-facing messaging and initiatives.
- Cost-efficient, providing opportunities for government savings.
- Reduces reporting confusion.

6.2 Core Functions of the Organisation

6.2.1 One-Door Reporting

- Single reporting point for online incidents across all stages.
- Accessible to public, agencies, NGOs and other professionals.
- Triage of reports
- Referral to specific in-house department (e.g. child sexual exploitation, gambling, violent extremism etc.)

6.2.2 Education and Prevention

- Digital safety educational campaigns and initiatives
- Prevention campaigns and initiatives
- Mental health awareness
- Workshops and courses for public, agencies, NGOs and other professionals.
- Information sharing.

6.2.3 Collaboration

- Hot-desk capability to enable to agencies and professionals to collaborate on investigations and projects, without the need for long secondments.

6.2.4 Legislation Oversight

- Monitoring compliance.
- Conducts dip-testing and official rating of apps for SIM cards.
- Data collection and trend analysis.
- Supporting enforcement actions.

6.3 International Collaboration and Information Sharing

- Collaborate with relevant international partners to address the global nature of online harm.
- Share intelligence, trends, and best practice relating to education, prevention, and enforcement.
- Support coordinated cross-border responses to online child sexual exploitation, violent extremism, scams, and objectionable content.
- Inform domestic education and prevention initiatives through global research and evidence.
- Engage in international collaboration where it adds clear value and aligns with New Zealand's legislative and policy framework.

6.4 Breakdown of Proposed Solution

New Zealand Digital Safety Organisation (Appendix E).

6.5 Relationship to All Other Stages

- Enables enforcement of Stages 1 and 2.
- Supports awareness and uptake of Stage 3.
- Provides feedback loops to improve all stages.
- Acts as the public-facing interface for the entire framework.

7. Integrated Model: How the Four Stages Work Together

- Stage 1 restricts unsafe access.
- Stage 2 closes a critical gap.
- Stage 3 ensures wellbeing and support.
- Stage 4 coordinates, educates and enforces.

8. Conclusion:

This model aims to balance child safety, parental responsibility, and digital freedom while ensuring that minors are not inadvertently exposed to illegal and harmful content online. It provides protection against the possible unintended harms and governance to ensure the framework is successful and contributes to safer online environment for all in Aotearoa New Zealand.

Appendix List

- Appendix A: Our Kids Online Submission to the Education and Workforce Committee
(Attached in full)
- Appendix B: NZ Child Internet Safety Act *(Attached in full)*
- Appendix C: App Ratings & Access Control Framework Proposal *(Attached in full)*
- Appendix D: YouthConnect NZ *(Attached in full)*
- Appendix E: New Zealand Digital Safety Organisation Framework Proposal *(Attached in full)*