



Working with
Women Alliance

Submission

The Anti-Bullying Rapid Review

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Submitted by

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<https://wwa.org.au/>

Acknowledgement of Country

The Working with Women Alliance (WwWA) acknowledge the Traditional Owners of the land on which we work and live. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present and future. We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge. We extend our respect to Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and always will be Aboriginal land. We acknowledge the strength of Aboriginal and Torres Strait Islander people and communities. We acknowledge that Australian governments have been complicit in the entrenched disadvantage, intergenerational trauma and ongoing institutional racism faced by Aboriginal and Torres Strait Islander people. We recognise that Aboriginal and Torres Strait Islander people must lead the design and delivery of services that affect them for better life outcomes to be achieved.

About Us

The Working with Women Alliance (WwWA) represents two key portfolios: National Women's Safety (NWS) and National Women's Equality (NWE). The WwWA connects the critical areas of gender-based violence prevention and the advancement of women's economic equality and leadership, bridging these important policy fields for greater impact. We work with members and stakeholders, including the Australian Government, to provide expertise and advice on gender equality and women's safety.

Executive Summary

This submission highlights the critical need for coordinated, trauma-informed, and future-facing responses to bullying in Australian schools - particularly in the context of digital abuse and emerging AI technologies.

Promising practices are already being implemented in schools through models like *Safe on Social* by *CTRL+SHIFT*, and restorative justice initiatives such as *DEAP*, which address serious digital misconduct through school-led accountability and behavioural change. These programs are complemented by ongoing staff training (*COACH*) and tools that support digital risk assessment (*PULSE*), demonstrating the value of whole-of-school approaches that are embedded, proactive, and responsive to the digital lives of students.

However, existing policies and legal frameworks are not keeping pace with the evolving landscape of technology-facilitated abuse. The widespread use of deepfake pornography - overwhelmingly targeting girls - has escalated both the prevalence and severity of sexual bullying in schools. Students as young as 13 report having deepfake nudes created or shared without consent, often by peers, with devastating impacts on safety, mental health, and trust in the school environment.

Legislation remains inconsistent and inadequate. There is no nationally accepted definition of "deepfake," and current Commonwealth offences do not cover the creation or threat of distributing synthetic sexual material. Schools are left to manage incidents without the legal or systemic backing required to adequately support victim-survivors, and departmental responses have been shown most notably by the Victorian Ombudsman to lack coordination, transparency, and wraparound care.

To respond effectively, Australia requires a whole-of-system approach that includes:

- National regulation of AI tools used in education, including mandatory oversight and accreditation for high-risk applications.
- Curriculum reform to embed digital literacy and respectful relationships education from early primary years.
- Stronger complaint and reporting systems supported by workforce development, trauma-informed training, and diverse school leadership.
- Legislative reform to criminalise the creation and threat of distribution of sexually explicit deepfakes, alongside a consistent national definition to aid enforcement and takedown efforts.
- Cultural change initiatives that challenge the gendered norms, algorithmic bias, and pornographic narratives that underpin bullying behaviour.

Without these reforms, Australia risks failing to protect a generation of students from the compounding harms of digital abuse, gendered violence, and institutional neglect. Every student deserves to feel safe and respected in the classroom, online, and beyond.

1. What's working in schools to prevent and address bullying?

Programs like *Safe on Social* by CTRL+SHIFTⁱ are proving effective in bridging the gap between fragmented responses to digital harm and the systemic realities facing young people. These models provide proactive, embedded, whole-of-school strategies designed not only to react but to prevent harm in digital contexts. They offer a suite of services to schools and youth organisations, helping communities respond more holistically.

Particularly promising is the DEAP frameworkⁱⁱ (Describe, Empathise, Accountability, Plan for Change), a school-led restorative justice program tailored for serious digital misconduct. Designed to work alongside behavioural management plans, DEAP empowers schools to intervene meaningfully without defaulting to punitive responses.

Complementing this, the COACH modelⁱⁱⁱ ensures consistent training for school-appointed Digital Safety Coaches throughout the year, embedding expertise into the fabric of school culture. The PULSE^{iv} digital intelligence scan further supports school-wide safety by identifying hidden digital risks and planning system-level improvements.

Encompassing all aspects of education, from early childhood learning, primary and secondary schools, as well as organisations, Evolve Education^v offers workshops for parents, educators and students that promote digital safety and wellbeing. With an ethos of encouraging peer-to-peer methods of learning, these workshops offer resources and tools for navigating and responding to online risks and trends, meeting students and educators where they are and in a way that is relevant to them.

On a regulatory front, international frameworks like the EU AI Act present a promising model. Its risk-based rules provide oversight of high-risk AI use in education, mandating accountability, human oversight, and prompt reporting of serious incidents offering a blueprint for responsive governance in emerging tech landscapes.

2. What's not working?

Responses to technology-facilitated child abuse are lagging far behind the tools creating the harm. The rise of deepfake pornography, often powered by AI, has intensified sexual bullying in schools. Apps can now generate realistic nude images in minutes with no cost and minimal skill required. One in three deepfake tools are explicitly designed to create sexually explicit content,^{vi} and this technology is being used overwhelmingly to target women and girls. A 2023 report found that 98% of deepfake content online was pornographic, and 99% of it targeted women.^{vii}

What's more disturbing is how these technologies are being used by school-aged children. A growing number of teens report either knowing someone targeted by deepfake nudes or having been targeted themselves.^{viii} This isn't a fringe concern, it's a widespread and growing threat that leaves girls feeling unsafe in school and online. Recent incidents at prominent Australian high schools underscore the scale of the problem, with principals warning that these behaviours are "an issue for every school in the country."^{ix}

Current legislation is failing to keep pace. There is no clear national definition of "deepfake," which hinders regulation and content removal. Commonwealth law does not currently criminalise the creation of sexually explicit deepfakes only their transmission leaving a major legal loophole. Threats to create or distribute such material are also not covered, and frameworks within schools remain siloed and poorly coordinated.

A scathing report by the Victorian Ombudsman^x revealed serious failings in departmental responses to child sexual abuse in schools, including a lack of wraparound support for students and families, poor coordination with education authorities, and inadequate internal review mechanisms.

3. What changes are needed to improve bullying prevention and response?

From a whole-of-school perspective, we need to embed digital literacy and respectful relationships education from the earliest years of schooling. Finland's education system provides a strong example - digital safety and ethical online behaviour are core to the curriculum from day one. Australian schools must also invest in professional development, diverse leadership, and trauma-informed frameworks that empower staff to respond effectively to harm.

Systems of accountability, such as complaint reporting mechanisms, must be strengthened particularly those that support victim-survivors. Partnerships between external program providers and school staff should be actively fostered to draw on complementary strengths and build sustainable change.

At the education system level, urgent reform is needed to assess and accredit high-risk AI tools used in schools. We need a national regulatory framework that embeds safety-by-design principles and mandates support for those affected by digital abuse. These reforms must reflect the lived experiences of students and teachers, with an emphasis on cultural safety and inclusion. Removing arbitrary administrative barriers will also ensure stronger coordination across jurisdictions.

4. What are the underlying causes of bullying in schools?

Bullying, especially in its sexual and digital forms, is rooted in harmful gender norms and power dynamics. These beliefs are shaped early reinforced by peers, families, and social systems. AI technologies are now reproducing and amplifying these biases. Gender bias in algorithmic outputs - from medical images^{xi} to leadership narratives^{xii} normalises the erasure or distortion of women's presence and competence.

Exposure to violent pornography is another powerful force shaping young people's attitudes toward sex, relationships, and bodies. Research shows that 45% of content on Pornhub includes acts of aggression^{xiii}, and sexually violent scenes disproportionately target women and girls^{xiv}. With smartphones granting easy access to this content, young people are being socialised into toxic expectations without adequate counter-education.

Ultimately, these trends create a culture where bullying - particularly sexual and digitally facilitated bullying - thrives. To disrupt it, we must treat bullying as a symptom of broader systemic failures and respond with structural, cultural, and educational reform.

NWSA Member Case Study: Lisa – When Adult Behaviour Sanctions Student Harm

Lisa was a student at a Canberra high school in the 1990s. Like many teenagers, she wanted to belong. She was outgoing, loved to sing, and hoped to join the school musical. But from the moment a teacher remarked “*at least I'm not fat*” in front of her classmates, Lisa was no longer seen for her potential only her body.

That single comment wasn't an anomaly. It was the beginning of a pattern: staff who made jokes about Lisa's weight during lessons, discouraged her from auditions, and allowed bullying by other students to go unchecked. One teacher told her outright not to try out for the school musical, saying “*we need people who can move well.*” Others laughed when classmates mimicked her or excluded her from group work.

When bullying is modelled or tolerated by educators, it doesn't just harm it legitimises harm. In Lisa's case, teacher behaviour created a school culture where students felt empowered to mock, isolate and target her. She was called names in the hallway, had used tampons throw at her at outside assemblies, and was regularly humiliated in front of her peers.

The damage was profound. Lisa developed an eating disorder that lasted more than a decade. By her early thirties, she was in recovery but facing the long-term consequences: reproductive complications and the heartbreaking news that she might not be able to conceive.

Lisa’s story illustrates the long shadow cast by school-based bullying especially when it’s sanctioned or initiated by staff. The trauma wasn’t just social. It became physiological, psychological, and enduring. Her experience reinforces the urgent need for a national framework that addresses adult behaviour as a central component of bullying prevention.

ⁱ CRTL SHFT. (2025). Services with Impact for Schools & Youth Organisations.

<https://www.safeonsocial.com/education>

ⁱⁱ CRTL SHFT. (2025). Digital Ethics & Accountability Pathway. <https://www.safeonsocial.com/deap>

ⁱⁱⁱ CRTL SHFT. (2025). Online Safety Coach. <https://www.safeonsocial.com/online-safety-coach>

^{iv} CRTL SHFT. (2025). Digital Pulse. <https://www.safeonsocial.com/checkup>

^v Evolve Education. (2025). <https://evolve-edu.com.au/>

^{vi} Tvesha Sippy, Florence E. Enock, Jonathan Bright, Helen Z. Margetts. (2024). Behind the Deepfake: 8% Create; 90% Concerned.

<https://arxiv.org/html/2407.05529v1#:~:text=Home%20Security%20Heroes%20reports%20that,25%20minutes%20and%20costs%20nothing.>

^{vii} Security Hero. (2023). 2023 State of Deepfakes. <https://www.securityhero.io/state-of-deepfakes/#key-findings>.

^{viii} Thorn. (2025). Deepfake Nudes & Young People: Navigating a New Frontier in Technology-facilitated Nonconsensual Sexual Abuse and Exploitation. <https://www.thorn.org/research/library/deepfake-nudes-and-young-people/>

^{ix} Rhiana Whitson. (2025). Principals say parents need to be vigilant as explicit AI deepfakes become more easily accessible to students. ABC News. <https://www.abc.net.au/news/2024-06-25/explicit-ai-deepfakes-students-bacchus-marsh-grammar/104016178>

^x Victorian Ombudsman. (2025). Support when children are sexually abused at school: The Department of Education’s response to abuse in a Victorian primary school. <https://www.ombudsman.vic.gov.au/our-impact/investigation-reports/support-when-children-are-sexually-abused-at-school>

^{xi} Geoffrey Currie, Josie Currie, Sam Anderson, Johnathan Hewis. (2024). Gender bias in generative artificial intelligence text-to-image depiction of medical students.

<https://journals.sagepub.com/doi/10.1177/00178969241274621>

^{xii} Isobel Barry, Elise Stephenson. (2025). The Gendered, Epistemic Injustices of Generative AI.

<https://www.tandfonline.com/doi/full/10.1080/08164649.2025.2480927#abstract>

^{xiii} Children’s Commissioner. (2023). ‘A lot of it is actually just abuse’: Young people and pornography. <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/02/cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf>

^{xiv} Niki Fritz, Vinny Malic, Bryant Paul, Yanyan Zhou. (2020). A Descriptive Analysis of the Types, Targets, and Relative Frequency of Aggression in Mainstream Pornography. <https://pubmed.ncbi.nlm.nih.gov/32661813/>