



**Commissioner for Children and Young People**  
Western Australia

**All enquiries**

Telephone: (08) 6213 2297  
Email: [caron.irwin@ccyp.wa.gov.au](mailto:caron.irwin@ccyp.wa.gov.au)  
Our reference: 13/458

Mr Colin Neave  
Chair, Commonwealth Consumer Affairs Advisory Council  
C/- The Manager  
Consumer Policy Framework Unit  
Competition and Consumer Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Dear Mr ~~Neave~~ *Colin*

**Inquiry into App purchases by Australian consumers on mobile and handheld devices**

Thank you for the opportunity to comment on the Issues Paper for the Inquiry into App purchases by Australian consumers on mobile and handheld devices.

As Commissioner for Children and Young People in Western Australia I have a statutory responsibility to monitor the wellbeing of all children and young people under the age of 18 years and promote what is in their best interests. One of my statutory functions is to promote the participation of children and young people in the making of decisions that affect their lives and encourage government and other agencies to seek the participation of children and young people appropriate to their age and maturity.

In my role I travel throughout WA and talk to children and young people, their families and community members. I am aware of concerns about children's use of apps and the potential for them to make significant in-app purchases without parental permission, and in many cases inadvertently.

Given that your inquiry questions make specific reference to children and young people, I would strongly encourage you to engage directly with children and young people to get their views and allow them to have a voice in this inquiry. Mechanisms for including the views of children and young people in identifying issues and their needs and in developing the programs, services, policies and strategies to address those needs is central to the provision of effective responses to issues. When the Joint Select Committee on Cyber-Safety called for submissions, I advocated that they should engage directly with children and young people. As a result, the Committee developed an on-line survey which received over 33,000 responses from children and young people.

*Caring for the future growing up today*

My office has developed guidelines to assist agencies in engaging effectively with children and young people. These guidelines, published as *Involving children and young people*, are available from my website at <http://www.ccyp.wa.gov.au/files/Participation%20Guidelines.pdf>

There are a number of organisations which may be able to assist in consultations with children and young people. The Australian Youth Advisory Coalition is the non-government youth affairs peak body, and includes representatives of young people from across Australia. AYAC can be contacted via [admin@ayac.org.au](mailto:admin@ayac.org.au) or on (02) 9212 0500.

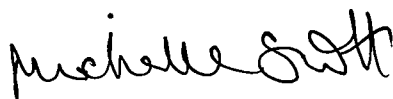
The CREATE Foundation supports the National Youth Advisory Council, which includes representatives from all states. CREATE can be contacted on 1800 605 155.

Specific to Western Australia, you may wish to contact the Youth Affairs Council, YACWA, on 1800 670 231 or via email on [yacwa@yacwa.org.au](mailto:yacwa@yacwa.org.au).

It is also important that children and young people are able to access information on their rights as consumers in language and a format accessible to them. I would therefore encourage the inquiry to consider whether consumer information for app purchases could be made more user-friendly for children and young people, to enable them to fully understand their rights and obligations in an appropriate format. In WA, the Department of Commerce has information on consumer rights and on workplace rights designed particularly for young people. I would encourage you to visit their website (at [http://www.commerce.wa.gov.au/ConsumerProtection/Content/Consumers/Generation\\_Z.html](http://www.commerce.wa.gov.au/ConsumerProtection/Content/Consumers/Generation_Z.html) and [http://www.commerce.wa.gov.au/LabourRelations/Content/Employees/Young\\_Workers/index.htm](http://www.commerce.wa.gov.au/LabourRelations/Content/Employees/Young_Workers/index.htm) ) for examples.

Thank you again for the opportunity to comment. Should you have any further queries or wish to consult me on any issues related to this submission, please contact my office on (08) 6213 2297 or via email to [info@ccyp.wa.gov.au](mailto:info@ccyp.wa.gov.au).

Yours sincerely



MICHELLE SCOTT

Commissioner for Children and Young People WA

24 January 2013