

26th August 2025

Ms. Nonkqubela Jordan-Dyani,
Director General,
Department of Communications and Digital Technology
Block A3, iParioli Office Park,
1166 Park Street, **Hatfield, Pretoria**

Dear Ms. Jordan-Dyani

RE: GSMA SUBMISSION ON THE DRAFT WHITE PAPER ON AUDIO AND AUDIOVISUAL MEDIA SERVICES AND ONLINE SAFETY.

The GSMA welcomes the opportunity to provide a submission on South Africa's Draft White Paper on Audio and Audiovisual Media Services and Online Safety, emphasising the need for a balanced, inclusive, and modern regulatory framework that protects users, especially children and vulnerable persons including those with disabilities, while fostering innovation and digital growth. Further, the GSMA supports the momentum to bring about meaningful change that will protect and empower online users.

We thank the DCDT for affording GSMA the opportunity to be a part of this policy dialogue. We believe that with the appropriate policy framework it is possible to create an environment that supports both the attainment of socio-economic objectives and continued growth of the mobile technology service industry.

We request the DCDT to review the following to have a holistic approach to the proposed regulatory framework to modernise South Africa's audio and audiovisual media services (AAVMS) and online safety, addressing challenges posed by digital transformation, global streaming platforms, and online harms:



1. **Online Safety:** Protection of digital consumers, especially children from potential risks in the digital environment.
2. **Accessibility:** Promote access for persons with disabilities.
3. **Skills Development, Literacy and Awareness:** Provision of initiatives that must take place outside of the Policy, as part of the whole-of-government approach to digital transformation.
4. **Regulatory Parity and Balanced Regulation:** Adopt a technology-neutral approach to ensure fair regulation across all ecosystem players. The policy must balance freedom of expression with the need to safeguard children's physical, mental, and moral development.

We look forward to participating further in this process, including any public hearings which may be conducted by the DCDT. We remain available to discuss our comments in detail.

Yours Sincerely,



Angela Wamola
Head of Sub-Saharan Africa

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GSMA ADVISORY ON THE ON THE DRAFT WHITE PAPER ON AUDIO AND AUDIOVISUAL MEDIA SERVICES AND ONLINE SAFETY.

“In this digital age, the future of our democracies, societies and economies depends on digital ecosystems that are open, fair, competitive, and respectful of the rule of law. The adoption of digital technology brings the promise of addressing some of the biggest challenges of our times: climate change, inclusion, socio-economic growth – just to name a few. However, progress will only happen if digital industries are able to advance a purpose that goes beyond just delivering for narrow categories such as “users” or “consumers”. Digital technology needs to serve citizens.” – Joint Position Paper by the GSMA and ETNO

Electronic communication services and connectivity underpin people’s digital lives and consumer behaviours. At the same time, as markets and technologies converge, connectivity becomes increasingly entwined with wider consumer propositions and larger ecosystems. Digital ecosystems have themselves become more complex and multi-layered. Large online platforms have become the centrepiece of digital environments. They hold the key to the user experience online, and they are the strategic partners for all businesses.

Thus, the digital economy has become a broad, diverse ecosystem. One in which innovation thrives through collaboration and competition, but also through all players taking responsibility across global value-chains.



1. **Online Safety:** Protection of digital consumers, especially children from potential risks in the digital environment.

GSMA Recommendation

- **Online safety focus:** The GSMA proposes that children and consumers should be protected from harmful content and ensuring accountability by all the players.

The GSMA is in support of the aspect of online safety for children and young people in relation to their privacy rights and how these are best protected. Further, the GSMA note that an individual's right to privacy is protected under both the International Covenant on Civil and Political Rights (Article 17) as well as the European Convention on Human Rights (Article 8) with specific protections for a child's right to privacy under the UN Convention on the Rights of the Child (UNCRC). Online safety legislation should ensure that the full range of children and young people's fundamental rights, from protection to participation, are respected in keeping with the UN Committee on the Rights of the Child's General Comment No. 25 on children's rights in relation to the digital environment (2021)

2. **Accessibility:** Promote access for persons with disabilities.

GSMA Recommendation

- **Accessibility for persons with disabilities:** The GSMA Consumer Survey data shows that there is lower internet-enabled device ownership and mobile internet use among persons with disabilities, especially women. The GSMA supports disability-inclusive handset affordability and education interventions, to promote equitable digital access.

The industry needs to build disability-intentionality into everything that it does, including handset affordability and digital skills interventions, rather than adding on efforts as an afterthought. The GSMA is of the view that the principles of universal design be upheld.



3. Skills Development, Literacy and Awareness: The submission calls for skills development, literacy and awareness.

GSMA Recommendation

• **Skills development and digital literacy:** The GSMA supports calls for digital literacy and online safety education initiatives outside the policy, embedded in a whole-of-government approach, including school curricula and public awareness campaigns to empower children, parents and all users. Further, the GSMA is of the view that investment must be made to guarantee that scalable digital literacy, online safety education and awareness initiatives are provided, as a critical element for the protection of children in the digital ecosystem.

Industry-led initiatives: Examples include MTN’s child safety programme, and GSMA’s Mobile Internet Skills Training Toolkit

a) **MTN Group’s “Help Children be Children” initiative**, focuses on promoting online child safety via child champions, preventing online child abuse and exploitation, and empowering children with the tools to navigate the digital world safely

b) **GSMA’s Mobile Internet Skills Training Toolkit (MISTT)** is reaching millions for digital skills.

MISTT is a set of free resources to educate people on the basics of mobile digital skills they need to access and use mobile internet. The toolkit uses a ‘train the trainer’ approach and consists of short lessons available in PDF and video format that can be easily adapted to local needs and languages and delivered to customers in a range of different ways. MISTT has so far been used to train more than 80 million people across over 40 countries with basic mobile digital skills. MISTT is proven to increase customer adoption and usage of mobile internet.



- 4. Regulatory Parity and Balanced Regulation:** Adopt a technology-neutral approach to ensure fair regulation across platforms. The policy must seek to balance the rights of all digital consumers, carefully addressing any tensions between – for example – privacy or freedom of expression and protection.

GSMA Recommendation

- **Regulatory parity and technology neutrality:** The GSMA advocates for a technology-neutral regulatory approach that encourages all players to take responsibility and a rights-based approach.
- **Global and regional context:** The submission references GSMA's alignment with European digital policy principles and highlights the importance of digital ecosystems that serve citizens beyond mere consumers, addressing socio-economic challenges inclusively.
- **Direct the regulatory focus:** ensure that regulation accurately reflects the diverse nature of internet industry players and the digital ecosystem.
- **Legal frameworks:** must be in place which hold perpetrators involved in online child abuse and exploitation accountable;
- **Emerging technologies:** Consideration of the specific needs of children, taking a child rights-based approach, within wider digital regulations addressing emerging technologies.
- **Inclusion of young people:** Organisations like UNICEF can support with the inclusion of young people's perspectives into policy and framework development.

Public-private partnerships: Emphasising collaborative efforts among governments, industry, NGOs, and young people, the GSMA supports a multistakeholder approach to creating a digital environment that works for everybody.

