

30 July 2025

Retail NZ Submission to the Education and Workforce Committee Inquiry into the Harm Young New Zealanders Encounter Online

1. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, with our membership accounting for nearly 70% of all domestic retail turnover. New Zealand's retail sector comprises approximately 30,000 businesses and employs around 227,000 Kiwis.
2. Retail NZ consulted our membership in the preparation of this submission.
3. Retail NZ is supportive of the overall aim of this inquiry, which will support retail employers' efforts to keep their staff, particularly rangatahi (15-24 year olds) as safe as possible from online harms incurred in the context of their work. While this inquiry is not specific to retail, we hope it will provide much-needed legislative support for our members who are victims of online abuse.
4. The retail workforce is diverse, with a range of roles from customer service to management, digital and data analytics, logistics, procurement, security, social media and marketing and many more. 58% of people in the retail and distribution sector are women, and 27% of employees are aged 15-24, much higher than the New Zealand population total of 15%.
5. These demographics highlight a significant cohort of rangatahi, many of whom are in their first employment experiences, who are particularly vulnerable to online harm.
6. Our members are reporting that there are increasing instances where young retail workers face online abuse, harassment, and intimidation. This can manifest as personal attacks, doxing, threats, cyber-bullying or public shaming stemming from customer interactions on social media, online review platforms, or through direct digital messages. Worryingly, some workers are reporting in-person threats and confrontations that stem from online interactions. These behaviours not only threaten the safety and wellbeing of young employees but also have significant mental health impacts, including increased stress, anxiety, and reduced self-esteem, resulting in time off work and sometimes resignation.
7. Bullying, including cyberbullying, can lead to higher absenteeism from the workplace, poor or reduced performance and people feeling unsafe at work.
8. Retail NZ is supportive of ensuring that offences relating to causing online harms are clearly defined and carry appropriate penalties. We hope that it will serve as a crucial deterrent against abusive behaviour and reinforce the message that threats, intimidation and persistent harassment - whether in person or online - will not be tolerated in a retail environment or anywhere else in Aotearoa New Zealand.
9. In 2024, Netsafe received 28,468 reports of online harm, including 1,523 breaches of Principle 5, which prohibits using digital communication to harass an individual. However, Ministry of Justice data shows just 71 people were convicted under the

Harmful Digital Communications Act in the same year. This gap between reported harm and legal consequence suggests that the current enforcement framework is not addressing the scale of online abuse.

10. Retail NZ is supportive of the overall aim of this inquiry, as it seeks to identify solutions to problems related to online harm. We hope that the recommendations will serve as an important step towards creating safer online environments for all rangatahi, including those who contribute significantly to our economy through their work in retail.

Recommendations for the committee:

10. Ensure offences relating to online abuse are clearly defined and carry appropriate, enforceable penalties which reflect the seriousness of the harm caused by online threats, intimidation, and harassment. This must serve as a strong deterrent to abusive behaviour that harms to our rangatahi working in retail.
11. Agencies such as Netsafe, Police, Oranga Tamariki, the Office of the Privacy Commissioner, and community mental health services all play a role in responding to online harm. These services must be adequately resourced to:
 - respond quickly and effectively to reports of abuse
 - provide expert advice to employers and young workers
 - deliver targeted education and support for victims of online harm
 - coordinate across sectors to reduce duplication and gaps in service delivery.
12. Work with technology companies to ensure they are preventing and responding to harm:
 - enabling faster takedown processes for harmful or abusive content
 - increasing platform accountability for protecting young and public-facing workers
 - supporting algorithmic transparency to understand how harmful content is amplified.
13. Expand support and guidance for employers navigating online harm:
 - the Office of the Privacy Commissioner, WorkSafe, and MBIE give clear advice on managing privacy, data security, and digital safety when staff are targeted online
 - templates for internal policies and incident response plans
 - information about legal obligations and available protections under the Harmful Digital Communications Act and other relevant legislation.

Retail NZ would encourage businesses to consider the following actions:

14. Communicate a zero-tolerance policy for online abuse of staff, explicitly stating consequences for abusive customers (e.g., banning from online platforms, involving law enforcement).
15. Develop and deliver training for young retail staff on:
 - identifying and responding to online abuse
 - internal reporting procedures

- digital well-being and resilience
 - de-escalating threats both online and offline, which stem from online interactions.
16. Managers, who are often the first point of contact for staff experiencing online abuse, should receive training which equips them to:
- recognise signs of stress, trauma, or burnout resulting from online abuse
 - understand when and how to escalate issues internally (e.g., HR, legal) or externally (e.g., Police, Netsafe)
 - navigate privacy, confidentiality, and risk in relation to staff experiences and customer conduct
 - lead team-wide discussions around digital safety, reinforcing a proactive and supportive workplace culture.
17. Review external support offers such as employee assistance programmes:
- employers should promote these services in onboarding of new staff and at team meetings
 - monitor uptake and satisfaction of these services to ensure they are fit for purpose.
18. Develop clear and robust policies and procedures for reporting online abuse and supporting staff:
- establishing a dedicated reporting pathway for online abuse, separate from general complaints or incident forms, with clear timelines and responsibilities for follow-up
 - providing guidance on how to preserve evidence of online harm (e.g., screenshots, URLs) and when to escalate internally or externally
 - outlining the steps the business will take to support affected staff, such as modified duties, wellness check-ins, or temporary reassignment.
 - ensuring policies are widely communicated, reviewed annually, and co-produced with staff input to reflect lived experiences.

Retail NZ is happy to discuss any aspect of this submission further. Retail NZ would like the opportunity to make an oral submission to the committee.

No part of this submission should be withheld under the OIA.

Sincerely,



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