



**Joint Select Committee on Social
Media and Australian Society**

ARACY Submission

June 2024

About ARACY

ARACY's purpose is to champion all Australian children and young people to thrive. As our children's and young people's needs grow and change, so too must the support systems that surround them. Striving for best practice and policy to prevent disease and provide the best conditions for their holistic health.

Today's fast-paced world challenges parents, carers, educators, health professionals, and policymakers to continuously adapt. Governments must lead the charge in systemic improvements, navigating the complexities of various jurisdictions and sectors to truly prioritise young Australians. Our team stands at the forefront of this mission, bringing together the latest evidence, practitioners and policymakers to develop child-centred strategies that make a real difference.

We listen to and amplify the voices of young people. Amplifying their issues and solutions. When we say 'thriving' and 'wellbeing', we mean living a life of value as defined by children and young people. Focused on holistic wellbeing, including health, we aim for sustainable system changes to prevent diseases and promote early intervention. Our commitment to the complete wellbeing of young people drives us to seek meaningful and continual improvements.

The Nest

Central to our endeavour to help every child thrive is The Nest. Launched in 2013 after extensive consultations with over 4,000 children, families, and experts. This pioneering framework outlines six pivotal, interconnected dimensions of wellbeing essential for nurturing children and young people to thrive:

- Enjoying Good Physical and Mental Health
- Being Valued, Loved and Safe
- Access to Material Basics
- Engaging in Learning
- Active Participation and
- Cultivating a Positive Sense of Identity and Culture

We invite experts, advocates and policymakers to use The Nest to enhance their practice, paving the way for a happier and healthier future for the next generation of Australians. The Nest has been widely adopted by governments and organisations in Australia and around the world to inform both policy and practice.

Collaborative Insights and Endorsements

ARACY's submission is comprehensively informed by the esteemed recommendations and findings of the E-safety Commission, the Alannah and Madeline Foundation, and Orygen. We recognise the critical insights provided by these organisations, which have significantly shaped our approach to advocating for the wellbeing of children and young people in the digital age. ARACY fully endorses their submissions and aligns with their recommendations to enhance digital literacy, ensure responsible content management, and implement robust safety measures on digital platforms. Our collaborative efforts underscore a unified commitment to safeguarding and promoting the holistic development of young Australians.



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Executive Summary

The rapidly evolving digital landscape presents unique challenges and opportunities for children's and young people's development. Our submission emphasises the necessity of incorporating a human rights lens in legislative changes, fostering genuine partnerships with diverse stakeholders, and enhancing digital literacy to safeguard young minds. We advocate for proactive, evidence-based approaches that balance the benefits and potential harms of social media.

Summary of Recommendations:

- 1. Human Rights-Centric Legislation:**
 - Ensure all legislative changes prioritise the best interests of children (UNCRC Articles 3, 12, 13, 16, 17).
- 2. Inclusive and Collaborative Policy Development:**
 - Engage children, young people, and their families in all actions, including legislative changes, to enhance online safety and maximise positive social media impacts.
- 3. Comprehensive Media Engagement Research:**
 - Conduct consultations with children and young people on their engagement with traditional and social media to empower them in addressing misinformation.
- 4. Digital Literacy Enhancement:**
 - Empower children, young people, and caregivers with robust digital literacy education, focusing on the impacts and potential harms of recommender systems.
- 5. Industry Regulation and Accountability:**
 - Place the onus on social media platforms to regulate content and ensure safety, with child-friendly reporting mechanisms and the highest privacy settings by default.
- 6. Prohibit Harmful Digital Practices:**
 - Ban recommender systems, behavioural advertising, and the commercial use of data for individuals under 18 years.
- 7. Support Age-Appropriate Social Media Access:**
 - Implement age verification to ensure safe and appropriate platform engagement, without infringing on children's rights to freedom of expression.
- 8. Protective Content Curation:**
 - Ensure online service providers responsibly manage and moderate content, with transparent and accountable practices.
- 9. Address Data Privacy and Safety:**
 - Ban the harvesting, sale, and profiling of children's data for commercial purposes.

By following these recommendations, we aim to create a safer, more supportive digital environment that promotes the wellbeing and thriving of all Australian children and young people.

Summary of Key Points

1. **Human Rights Lens in Legislation:** All legislative changes should consider the impact on children and young people from a human rights perspective. As a signatory to the UN Convention on the Rights of the Child, Australia is obligated to ensure the best interests of the child (Article 3), uphold their rights to express views (Article 12), maintain freedom of expression (Article 13), protect data privacy (Article 16), and encourage beneficial mass media while protecting from harmful content (Article 17).
2. **Partnership in Enhancing Online Safety:** Legislative changes to enhance online safety should be conducted in genuine partnership with children, young people, and their families, respecting their right to have a say in decisions that affect them (UNCRC Article 12).
3. **Media Engagement Research:** There is limited evidence on how children and young people engage with Australian journalism and public interest media. Consultation is needed to understand their media consumption and empower them to address misinformation on social media.
4. **Data Deficit on Social Media Impact:** There is a lack of Australian data on social media's impact on the wellbeing of children and young people. International data suggests social media can have both harmful and beneficial effects.
5. **Empowering Digital Literacy:** Children, young people, and their caregivers should be empowered to keep themselves safe online by enhancing digital literacy, with emphasis on understanding recommender systems' impacts and potential harms.
6. **Industry Regulation and Accountability:** The onus should be on the industry to ensure adequate regulation of social media platforms and content to keep children safe.
7. **Balancing Benefits and Harms of Social Media:** Support steps to amplify social media's benefits while mitigating harms, including:
 - a. Opposing blanket bans on social media for children, which violate their rights to freedom of expression.
 - b. Supporting age verification to ensure safe engagement with appropriate content.
 - c. Banning recommender systems, behavioural advertising, and data commercialisation for those under 18.
 - d. Providing the highest privacy settings by default for users under 18.
 - e. Mandating child-friendly, age-appropriate reporting mechanisms.

Response to the Terms of Reference

(a) The use of age verification to protect Australian children from social media;

- A blanket ban on social media for young people violates Article 13 of the UN Convention on the Rights of the Child, which guarantees children's freedom of expression through any media (United Nations, 1989). Restrictions should only address the rights of others, national security, public order, public health, or morals.

Under UNCRC Article 17, Australia must develop guidelines to protect children from harmful media and promote the dissemination of beneficial information.

Children have the right to participate in decisions affecting them, as per UNCRC Article 12. Their views should be considered in online safety measures, supporting child wellbeing through meaningful engagement (United Nations, 1989).

- We surveyed young people aged 13 to 25 on their views about a social media ban for those under 15. The responses were mixed:
 - **13 Supporters** cited mental health impacts, self-image issues, and social media addiction.
 - **14 Opponents** highlighted the importance of social media for connection, accessing information, and relaxation. They also noted potential ineffectiveness of bans, increased risks of cyberbullying, and the right to information and parental choice.
 - **2** were **Unsure**.

While not necessarily representative of the wider population of young people, this poll is illustrative of the mixed views about young people of the potential harms and benefits of social media.

To understand this better, we asked why our young respondents would or would not support a ban (See Appendix 1 for direct quotes). Young people who supported a social media ban pointed to detrimental effects of social media on mental health, self-image, and its addictive properties. Young people who were against a social media ban pointed to the use of social media to connect with peer and networks, access important information, relax, and the risks of a ban not being effective. This included the utility of social media to:

- Access supports (for example for domestic violence and mental health)
- Connect with friends
- Connect with like-minded communities
- Gain information on politics, news, and current affairs
- The use of social media for recreation, relaxation, and enjoyment
- The likelihood of this being ineffectual (i.e. by ‘faking’ their age)
- The potentially increased harms of cyberbullying if young people feel they can’t seek help when accessing banned activities
- The rights of young people to access information and parents to make decisions about social media.

Young people supported keeping young people safe online but suggested “teach[ing] internet safety” and creating “young-person-friendly social media” as alternatives to a ban.

- There is a deficit of Australian data on the impact of social media on child and adolescent wellbeing. International evidence shows mixed effects, linking increased social media use to both benefits (e.g., social connectedness, creativity) and harms (e.g., mental health issues, misinformation) (Keles, McCrae, & Grealish, 2020; Geirdal, et al., 2021; Smith, Leonis, & Anandavalli, 2021) The details of this are covered in Orygen’s submission to this inquiry (Orygen, 2024).
- Age verification is a useful tool for enhancing children's safety but is not a comprehensive solution. We point to a submission by the Alannah and Madeline Foundation to the Review of the Online Safety Act 2021, which states that while “technological solutions to age assurance can play a positive role in the wider picture of children's safety online” by for example protection from

illegal products and services, “age assurance is not a 'magic wand' and does not, in itself, make the online world safe for children” (Alannah & Madeline Foundation, 2024).

We also uphold and endorse the recommendations made by the Alannah & Madeline Foundation to:

1. Automatically provide the highest level of privacy setting by default to all users under the age of 18 years for all apps, websites, digital products, and online services.
2. Ban behavioural advertising to children under the age of 18 years.
3. Require all online services and products to have child-friendly, age-appropriate reporting mechanisms.

(b) the decision of Meta to abandon deals under the News Media Bargaining Code

- Out of scope.

(c) the important role of Australian journalism, news and public interest media in countering mis and disinformation on digital platforms;

- Australia must promote mass media that benefits children and young people, as per UNCRC Article 17 (United Nations, 1989).
- There is limited data on how Australian children and young people engage with traditional media.
- International studies show that traditional media is rarely consumed by young people, who predominantly rely on social media for news. For instance, a Dutch study found that young people aged 16 to 26 mostly used social media to stay informed, with minimal engagement with live television, radio, or newspapers (Swart, 2021).

(d) the algorithms, recommender systems and corporate decision making of digital platforms in influencing what Australians see, and the impacts of this on mental health;

- UNCRC Obligation: Australia must act in the best interest of children and protect them from harmful mass media content (United Nations, 1989).
- International Data: Increased social media use is linked to poorer mental health outcomes. The details of this are covered in a submission to this inquiry by Orygen (Orygen, 2024).
- eSafety Commission Findings: Recommender systems can amplify harms, especially for children, including (eSafety Commissioner, 2022):
 - Exposure to harmful material
 - Encouraging dangerous behaviour
 - Amplifying misinformation and extreme views
 - Normalising prejudice and hate
 - Inciting online and physical violence

The eSafety Commission states that particularly harmful content to children and young people includes (eSafety Commissioner, 2022):

- Friend or follower suggestions leading to interactions with dangerous adults
- Encouragement of binge consumption without breaks
- Promotion of unrealistic body ideals and beauty stereotypes
- Normalisation of the sexualisation of young people

- Content appropriate for adults but harmful to children not developmentally ready for it
- Enhance Digital Literacy: Educate children, young people, and caregivers about how recommender systems affect the content they see, shape their feelings, and influence their choices.
 - Awareness of Recommender System Design: Ensure children, young people, and caregivers understand that recommender systems are designed to keep users online and can cause harm through content exposure.
 - Account Feature Awareness: Inform children, young people, and caregivers about account features that help control content.
 - Responsible Content Curation: Require online service providers to manage content curation transparently and accountably.
 - AI and Human Moderation: Mandate that online service providers use both artificial intelligence and human moderators to manage content.
 - Safety by Design: Encourage online service providers to implement Safety by Design practices to reduce risks and algorithmic biases from the outset.

(e) other issues in relation to harmful or illegal content disseminated over social media, including scams, age-restricted content, child sexual abuse and violent extremist material; and

- Not addressed.

(f) any related matters.

- **Australia has an obligation as a signatory to the UNCRC to protect children’s privacy by law.** Article 16 of the UNCRC states that “no child shall be subjected to arbitrary or unlawful interference with his or her privacy” and that children have “the right to the protection of the law against such interference or attacks” (United Nations, 1989).
- **Broader threats to children’s safety are inherent in the commercial models of many digital platforms (i.e. the monetising of children and their personal information)** are noted by the Alannah and Madeline Foundation (Alannah & Madeline Foundation, 2024).

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Appendix

1. ARACY Emailed a survey of young people on 23 May 2024. Here are the responses of the 29 participants who were aged between 16 and 23:

Those in favour of a ban on social media:	Those against a ban on social media:
<ul style="list-style-type: none"> • It has addictive and potentially harmful effects, comparable to smoking or alcohol, which are already banned for minors. Children should learn to live healthily without social media. • Social media addiction is something a majority of young people have experienced. The cons outway the pros. • I support it because of all the data demonstrating the negative effects of it on children and teens. • The influence that social media has on children is SIGNIFICANT! It's more negative than positive. Kids can't even hold down a conversation let alone think for themselves. • Social media has a detrimental impact on the mental health of many young people. Platforms facilitate damaging interactions and bullying. Friends/family compare self-harm and discuss suicide methods. • Destroy self image due to social comparison and exposes vulneeeable youth to unsavoury and addictive content. Affects their memory, attention span and critical thinking. • I support the ban due to the detrimental effects our young people are experiencing due to the allowance of social media. Social media is not something for the innocent or light hearted • Social media has such a great rate of bad influence. It drives you get people when they are growing and finding how to act, to learn from the wrong people, meaning that they adapt bad habits/actions 	<ul style="list-style-type: none"> • This would ban their access to safe and supportive communities, places where they can freely express themselves, where they can meet and/or stay connected to friends. I strongly oppose this motion. • Suppression of access to information for younger people • A lot of prevention work for domestic violence is shared through social media. Being unable to access social media will lead to higher rates of this, and especially lower rates of reporting. • While I think kids need to be kept safe online, I don't think this policy is the best way to do it • If you ban it, people will just find ways to fake their age anyway • Let parents have freedom of choice to put their child on social media • Social media is a MASSIVE way for young people to get support and 16 is WAYYYY to high a cut off. I wouldn't have gotten the mental health help I needed at 14 if not for social media. It changes lives • Ability to connect with peers while being unable to see them in person (eg when one has covid); unicorn chasers (feeds of kittens to cover up the bad in the world); way to escape/relax • Social media is the primary way we currently spread information to youth regarding politics & current affairs, and excluding those under 16 from these movements will be detrimental to future politics. • cause i like media • They say mental health will improve from the ban, however I know many youths use social media to reach out to people for mental health support,
Those with mixed views:	
<ul style="list-style-type: none"> • I support a ban, but the implementation of it would require privacy invasive procedures such as submitting identity 	

<p>documentation to private social media companies. Blind signatures should be used.</p> <ul style="list-style-type: none"> • I support it in principle but more details are needed to understand how it is going to be restricted. • Screen time may affect mental health by showing children explicit or graphic content, however the importance of staying connected with loved ones and in one's community is important. 	<p>educate themselves and feel comfortable in who they are.</p> <ul style="list-style-type: none"> • I don't think banning it should be the first solution. Making a more young-person-friendly social media would be a better starting solution. But social media right now is not good for kids • Building community is incredibly important and the current social norm is to communicate via these types of apps. • I don't think if this is a good way to help young people staying safe. they will somehow find their ways to social media but this time without the opportunity to get legal help if they bullied online • A lot of youth organisations are caring and reaching out to youth through social media and it means more outreach than ever before. Don't ban it, teach internet safety instead
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