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22 November 2024

Response to the Online Safety Amendment (Social Media Minimum Age) Bill 2024 [Provisions].

Submission made by the [Australian Research Council \(ARC\) Centre of Excellence for the Digital Child](#), prepared by Professor Tama Leaver (Curtin University), Professor Michael Dezuanni (QUT), Dr Aleesha Rodriguez (QUT) and Dr Amanda Levido (Southern Cross University).

About the Centre

The ARC Centre of Excellence for the Digital Child is shaping an environment with children, families, and communities so they can successfully navigate their own digital worlds. We know that children's lived experiences are rapidly changing, and that every childhood is now fundamentally digital. Our mission is to create positive digital childhoods for every child in Australia. The Digital Child is a national research centre comprised of over 200 researchers from across Australia in addition to national and international partners. Our research is focused on: *healthy digital lives*, understanding how digital technology intersects children's lived experiences and providing guidance to families, educators, and policymakers as they navigate this space; *educational empowerment*, equipping children with the skills they need to live their best digital lives; and *safe digital spaces*, making online engagement safer while promoting online opportunities and healthy digital relationships. The Digital Child is funded by the Australian Research Council. Our research includes the world-first Australian Children of the Digital Age longitudinal study, which is tracking digital engagement of more than 3,000 Australian families for four years.

General Response

As written, the proposed Bill is not the solution that the Government or parents and carers are looking for to address their concerns about children and young people's experiences online. We join over [140 national and international experts](#) and [Australia's leading mental health organisations](#) in warning the government that banning people under 16 from social media won't make social media safe. We need to move away from a deficit model when considering children's engagement with the digital world. Our focus must shift from protecting children *from* the digital environment and more to protecting them *within* the digital environment. The Internet was not created with children in mind, but children still have a right to be online. Our goal as a society should not be to exclude children from social media, rather, it ought to be about creating and facilitating high-quality experiences for children online, which can include social media that provides age-appropriate experiences. To this end, researchers at the Australia Research Council (ARC) Centre of Excellence for the Digital Child have created the [Manifesto for a better Children's Internet](#) (2023) which outlines 17 actionable principles to improve, what can be described as, the Children's Internet. The Children's Internet is made up of an array of digital products and services that are both intended for, and not intended for, children. The term acts as a unifying concept to remind us that ***children have a right to playful, exploratory, fun, entertaining, positive, educational, and safe experiences online***. The recommendations listed in the [Principles for a better Children's Internet](#) (2024) document, provide clear guidance on how the Government can take realistic and measured steps to improve and support children's experiences online, without resorting to an underdeveloped and overly blunt ban.

Designing More Effective Regulation

The proposed Bill recognises that “parents and carers feel unsupported to make evidence-based choices”. However, banning children and young people from mainstream social media will push them into less known alternative digital spaces as teens reclaim the lost connections, learning, and play that was once facilitated by these major platforms. Parents and carers will be forced to do *more work* to understand and monitor their children’s online activities, in the face of less known and less familiar, and quite possibly less safe, digital spaces. Instead, government should a) invest in the development of free high-quality digital experiences for children of all ages ([Principle 1](#)) and b) create accessible consumer information (such as quality standards akin, for example, to the Health Star Ratings or Television Programming Classifications) to support parents and careers, as well as children themselves, to make informed decisions about their participation and engagement online ([Principle 5](#)).

The Government proposes to exclude messaging apps from the definition of age-restricted social media platforms, but one of the large drivers for this proposed legislation is the concerns of online bullying and harassment, which are largely facilitated through messaging apps. This is raised not to say that messaging apps should not be excluded, rather to underscore that some of the concerns driving the Bill will not be resolved by banning children from other social media platforms. Bullying—digital or otherwise—is a cultural challenge, one that needs to be addressed holistically, and won't be solved or even meaningfully addressed by turning off a digital tap.

A key risk of the proposed legislation is that it will increase the burden on parents and carers as they contend with an ever increasing number of platforms and services that rely on ‘parental controls’. It is likely that as platforms seek to be exempt from the ban, they will develop ‘age appropriate’ versions of their services that over-rely on parental controls and child and parent negotiation regarding which features they are allowed to use ([Principle 14](#)). In regulatory terms, the government’s plan to focus on a [Digital Duty of Care](#), which requires platforms to evaluate the potential risks of their tools before they release them, is a much more productive legislative direction, placing the initial burden on platforms, not parents.

Children are Digital Citizens

Australia’s children have [the right to participate in the digital world](#) and deserve opportunities to experience a full range of digital experiences, including social media, as they grow and mature as digitally literate citizens. Through appropriate experience and the support of adults—including carers and educators— children who use a variety of social media can be active civic participants and learn to deeply engage with democratic processes. Experience and education are also vital in developing a range of vital skills, such as identifying and dealing with misinformation. If children and young people are required to wait until they are 16 years to access social media, they are going to be left with gaps in their knowledge and experience, leaving them vulnerable as young adults who are less likely to have adult support and scaffolding during early social media experiences. The details matter. Getting this right matters for everyone. **Enabling Australian teens to be full, articulate and deeply literate digital citizens is achievable and desirable, but a blanket ban is not the pathway to that future.**

References

Dezuanni, Michael, Aleesha Rodriguez, Julian Sefton-Green, Tama Leaver, Anna Bunn, Anna Potter, Rys Farthing, et al. “Manifesto for a Better Children’s Internet.” Digital Child Working Paper 2023-11, Australian Research Council Centre of Excellence for the Digital Child, Queensland University of Technology, 2023. <https://doi.org/10.26187/q42e-6047>

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