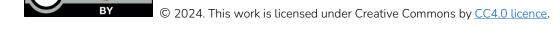
JOINT SELECT COMMITTEE ON SOCIAL MEDIA AND AUSTRALIAN SOCIETY ISA SUBMISSION 28 June 2024 INDEPENDENT SCHOOLS AUSTRALIA

Acknowledgement of Country Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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1. ABOUT ISA

Independent Schools Australia (ISA) is the national peak body for Independent schooling in Australia. ISA represents the sector on national issues and engages with the Australian Government, national agencies, media, key stakeholders, and the wider Australian community.

Working with the eight state and territory Associations of Independent Schools (AISs), ISA represents 716,800 students, over 1,215 schools and a workforce of 122,000 people.

Independent schools are long-established partners in Australia's education system, alongside government and Catholic schools. They make a valuable contribution to society and the learning and wellbeing of Australian children.

The Independent school sector is diverse, and schools serve a wide range of communities. The latest available data shows that more than one in six Australian school students attends an Independent school. For secondary students, it is over one in five.

Students at Independent schools reflect the full diversity of Australian society – including those who experience one or multiple forms of disadvantage. These students include:

- high-needs students with disability attending special schools
- Aboriginal and Torres Strait Islander students attending remote 100 per cent Indigenous schools
- students living in regional, rural and remote locations
- highly disadvantaged and disengaged young people attending Independent special assistance schools.

Most families with children enrolled in Independent schools are middle-to-low-income earners, increasingly from culturally diverse backgrounds, and residing in outer-suburban and inner-suburban communities. Many of these families are currently facing economic stress and are making substantial sacrifices for their children's education.

According to the most recent data, the majority of Independent schools charge annual fees of less than \$6,000, and there was a greater number of schools charging less than \$1,200 per year than those charging over \$20,000. Some Independent schools charge no fees at all. More than half of the sector's recurrent income comes from parents and families.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or alternatively recognised curriculum. Some have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some schools with common aims and educational philosophies are governed and administered as systems, for example, Lutheran schools. Systemic schools account for 20 per cent of schools in the sector but the majority of schools in the sector are autonomous non-systemic schools.

2. INTRODUCTION

ISA prepared this submission in response to the Joint Select Committee on Social Media and Australian Society's inquiry into and report on the influence and impacts of social media on Australian society.

ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

ISA welcomes this Inquiry into the influence and impact of social media on Australian society, and in particular, on young people.

Social media provides many opportunities to connect with people and learn new information, but also comes with significant risks for young Australians that need careful consideration. Social media has been increasingly associated with online bullying, pornography, scams and poor mental health conditions, and has been described as being more addictive than cigarettes and alcohol.¹

This submission provides Independent school perspectives on the effects of social media use on students. It outlines the challenges of defining social media, the risks and benefits of social media, and the challenges in implementing age assurance technology.

This submission will focus on the following matters noted in the Joint Select Committee's Terms of Reference: ²

- The use of age verification to protect Australian children from social media.
- Issues relating to the dissemination of age-restricted, harmful, or illegal content via social media.

3. RECOMMENDATIONS

The safety of young people online is a shared responsibility of governments, tech companies, schools, parents and carers and all users engaging in online environments.

To increase the safety of online environments for Australian youth, and to lower the risk of mental health problems and harmful content online, ISA makes the following recommendations:

- 1. Any law that sets a minimum age for social media use should define 'social media' clearly.
- 2. Agreed criteria should be established to determine which platforms should implement age verification procedures, instead of a general age prohibition from any sites that offer some online social interaction as part of their service.
- 3. Governments should undertake further research to ensure that policies addressing the challenges that social media use poses for young people are considered and appropriate.

¹ #StatusofMind, Royal Society for Public Health, 2017

² Terms of Reference, Joint Select Committee on Social Media and Australian Society, 2024

- Given the fast pace of digital change, governments should fund programs for all schools that provide education on generative AI literacy, especially regarding the generation of harmful deepfakes, and create awareness of the illegality and consequences of this and other activities.
- 5. If a legal age limit for using social media is enacted, governments should:
 - a) ensure that adequate funding for schools is available to enhance digital literacy and resilience education, with the goal of preparing students for a digital-skills dependent workforce.
 - ensure there are alternate channels and platforms for young Australians to still have a voice in important social and political issues, and do not feel excluded or marginalised.

4. SOCIAL MEDIA DEFINITIONAL CHALLENGES

The term 'social media' has a variety of definitions. For any age assurance process to be implemented, an agreed definition for social media is required to define digital platforms and technologies and ensure consistency in the application of age assurance requirements.

The Australian Bureau of Statistics' definition is quite broad, defining social media as 'web and mobilebased technologies which are used to turn communication into interactive dialogue among organisations, communities and individuals. These include blogs and micro-blogs such as Twitter; content communities such as YouTube; and social networking sites, such as Facebook, Instagram and LinkedIn.'3

Alternatively, the Office of the Australian Information Commissioner defines social media as 'any online social network. An online social network is a website or app that allows a user to create and share content online, for example, Facebook, Twitter or LinkedIn. This often involves sharing personal information in comments and messages, and photos and videos.'4

From a legislative perspective, the Online Safety Act 2021 defines a social media service as 'an electronic service that satisfies the following conditions:

- The sole or primary purpose of the service is to enable online social interaction between two or more end-users.
- The service allows end-users to link to, or interact with, some or all of the other end-users.
- The service allows end-users to post material on the service.'5

While these definitions share much common language, there is also ambiguity. For example:

- Some educational settings have their own social platforms for students to collaborate on group activities or to exchange information/resources. Although these are not similar to Facebook or X (Twitter) in terms of their purpose or primary use, they still fulfill many of the criteria that are part of the above definitions of social media.
- There is an incredibly broad range of website forums available online. Some, such as 4Chan⁶, are unmoderated forums notorious for hosting threats of violence, leaked explicit images of celebrities, and posts which encourage suicide and self-harm. In contrast, sites like Beyond Blue have forums where people can talk about mental health issues and offer support, with a special forum for

³ Social Media Presence, Australian Bureau of Statistics, 2017

⁴ Social Media, Office of the Australian Information Commissioner, viewed 25 June 2024

⁵ Online Safety Act, 2021

⁶ Though access to 4Chan has already been banned in Australia by many Telecommunications providers, it is still easily accessible using a Virtual Private Network.

youth. It will be difficult for laws that establish a minimum age for social media use to differentiate between these forums.

Video game consoles require users to have their own profiles, where they can add other users as friends and share messages and images. These are not generally considered to be social media platforms but would certainly be captured in a broad definition.

Laws that set a minimum age for social media use will require an agreed definition of what constitutes a social media platform, to avoid inadvertently affecting other platforms and websites which are not known to host harmful content. The criteria around what constitutes a social media network will also need to be clear enough to ensure that providers of new types of platforms are not able to circumvent age requirements.

5. IMPACT OF SOCIAL MEDIA ON YOUNG AUSTRALIANS

Australia's research base on the impact of social media is growing, but there is still more to be done. The Centre for Digital Wellbeing released a research brief discussing the impacts of social media on mental health and wellbeing, safety, and social cohesion in Australia, outlining policy responses to challenges such as hate speech, disinformation, and harmful content.⁷

Most young people report both positive and negative impacts of social media use and are seeking guidance on how to keep safe online. The eSafety Commissioner released the eSafety guide, a series of safety tips for users of social media and private messaging apps with information explaining how to keep social media account settings private.⁸

International and Australian research shows that social media does have benefits, like connecting with others, sharing and learning opinions, obtaining educational resources, and acquiring new skills from platforms like YouTube.

As research studies provide valuable insights into the risks and benefits associated with social media use, particularly for young people in Australia, ISA emphasises the need for continued research, to inform the development of education for students and policy development across governments to address these challenges.

5.1 RISKS

Research has found that many children provide false ages when signing up for a social media account. A UK study found that 9 in 10 children under 11 have a mobile phone and 60 per cent of children under the age of 13 who use social media accounts had their own profiles, despite not technically being old enough. If a child lies about their age to join the platform, their fake 'user age' will increase as they grow up. This exposes them to more content that is unsuitable or potentially harmful for their age. When asked which measures they used to protect themselves online, more than a third of children aged 12-17 (35%) reported using measures which might in fact have put them more at risk, because these measures could in fact expose them to potentially harmful content.

Young people may experience an increased risk of depression, anxiety, loneliness, self-harm, and suicidal thoughts associated with heavy social media use. Concerns include body image dissatisfaction, addiction, cyberbullying, and the normalisation of risk-taking behaviours.

The following sections provide a snapshot of some of the risks associated with young people having access to social media platforms.

⁷ The Impacts of Social Media in Australia, Centre for Digital Wellbeing, 2021

⁸ The eSafety Guide, eSafety Commissioner, viewed 25 June 2024

⁹ Children and parents: media use and attitudes report 2022, Ofcom, 2022

¹⁰ Children and parents: media use and attitudes report 2022, Ofcom, 2022

5.1.1 Age-inappropriate content

Young people can face serious harm from social media content that is not suited for their age. Exposure to explicit content, excessive screen time, privacy issues and poor mental health are key concerns. According to a survey of parents, nearly half of parents are extremely or very worried about their adolescents being exposed to explicit content on social media. 11

Some examples of inappropriate content include:

- exposure to graphic sexual and violent content
- glamorisation of eating disorders
- encouragement of self-harm or even suicide
- users creating fake identities for online grooming purposes
- being exposed to discriminatory or hate speech.

Research by the Australian government's eSafety Commissioner found that 44 per cent of adolescents had a negative experience online over a 6-month period in 2020, including being contacted by strangers, receiving inappropriate content, or being excluded from events or social groups.¹²

5.1.2 Navigating the unknown

Amidst growing concerns and a spike in school incidences, the eSafety Commissioner Julie Inman Grant was reported as saying, 'image-based abuse, including the production of deepfaked images and videos, was a persistent online harm which also represents one of the most egregious invasions of privacy'. ¹³ It is essential to provide immediate education on generative AI literacy and to make young people aware that they are breaking the law if they participate in this activity.

Personal data, confidentiality and privacy can be compromised when privacy settings are not well understood or implemented. Digi-tech companies breaching privacy to collect data for marketing purposes can also put children at risk.

Digital literacy education can teach young people how to:

- discern between false and true content
- be aware of fake identities
- understand algorithms and how they work
- manage unwanted advertisements
- understand the possibility of deepfakes
- find help and support when privacy has been violated or social media content has caused harm and distress.

¹¹ Explicit content, time-wasting are key social media worries for parents of U.S. teens, Pew Research Centre, 2022

¹² How does social media affect teenagers?, University of Queensland, 2021; The digital lives of Aussie teens, eSafety Commissioner, 2021

¹³ Student AI deepfake images reflective of porn crisis, Australian Associated Press, 2024

5.1.3 Impact on mental health

Parents are concerned that young people may share too much about their personal life online, or feel pressured to act in a certain way. They may be harassed or bullied through social media platforms, and experience problems with anxiety, depression, or lower self-esteem.¹⁴

In the last 6 months, the Association of Independent Schools NSW (AISNSW) has responded to over 35 requests for assistance for matters involving harmful and illegal content being shared between students over social media. Child sexual abuse and age-restricted content is a feature of many of the requests for support made by member schools. Most of these matters involve students possessing nudes, (non-consensual) sharing of nudes, and showing explicit images and videos to other students.

Some social media platforms, such as Snapchat have features that make the content disappear quickly. This exacerbates these incidents as they are difficult to investigate.

The Independent school sector is concerned that young people may face lasting harm from pressure, threats, or unwanted exposure to nudes, being asked to send nudes, or having their private images illegally shared.

This is now an even greater concern with the generative AI ability to create deepfake images and videos. AISNSW has received recent inquiries into the misuse of AI including:

- students accessing AI software to alter images of staff and/or students and replacing these images with pornographic images
- students accessing AI to alter staff speaking within a school context replacing their speech with inappropriate sexualised or racist language.

Students generating explicit photos involving staff and students using AI technology is a new wave of concern as it can create great distress for students and staff involved and exacerbate mental health issues.

Cyberbullying through social media about a person or group based on their race, religion, ethnicity, sexual orientation, disability or gender can be described as online hate and can have long lasting impact. In Australia, 25 per cent of young people aged 12 to 17 have been the targets of bullying or hurtful comments and 56 per cent have seen racist comments.¹⁵

Excessive use and social media addiction can lead to social isolation, stress, depression and anxiety. 16 It may interfere with a young person's sleep, time with family and schoolwork. 17 Household conflict due to social media use and excessive online gaming can also affect family dynamics and overall wellbeing.

5.2 BENEFITS

While many research articles focus on the negative impacts of social media on mental health and wellbeing, some recent studies have also linked social media use with feelings of increased social support and connectedness. Young people have a need for connection, acceptance and to feel included, though they are more vulnerable to the negative impacts of social media use than older cohorts.¹⁸

The following points may be seen as benefits of social media use for young people:

¹⁴ Explicit content, time-wasting are key social media worries for parents of U.S. teens, Pew Research Centre, 2022

¹⁵ Online hate, eSafety Commissioner, viewed 25 June 2024

¹⁶ The Impacts of Social Media in Australia, Centre for Digital Wellbeing, 2021

¹⁷ Adolescent Media Use: Attitudes, Effects and Online Experiences, Digital Wellness Lab, 2022

¹⁸ The Impacts of Social Media in Australia, Centre for Digital Wellbeing, 2021

- Online platforms can offer young people who have social difficulties a chance to join communities that welcome them. These communities may be based on shared traits (e.g. gender or sexual orientation), or on common hobbies.
- Those who live in remote communities can access different opportunities or perspectives that they might not normally encounter.
- Creating positive change by having a voice and learning from different situations and other people online can be empowering. 19
- Social media platforms can be used to spread positive messages and support those experiencing challenging times. Most Australian teenagers seek to build positive online relationships. The majority of young people who have had a negative online experience go on to engage in positive online behaviour, framing this experience as a learning opportunity. 20
- Platforms such as YouTube can be a valuable educational resource, and students experiencing disadvantage would be disproportionately affected if it was no longer available. These students may lack equitable opportunities or access to the same extracurricular activities as their peers. which can make them depend more on online platforms to explore possible career paths or deepen interests. YouTube is also commonly used in the classroom as lesson 'hooks', or to show curriculum related material.²¹
- During the COVID-19 pandemic, social media provided young Australians with a way to stay connected with their friends and social groups during lockdowns.
- A 2022 US study asked participants about the impacts, both positive and negative, of social media use. It found that:
 - o half of the participants reported that social media made friend relationships better (49.9%)
 - the vast majority said social media made them feel socially connected (79.4%) and emotionally supported by peers (69%) sometimes, often, or always
 - approximately half reported never or rarely feeling lonely or isolated (50%), sad or depressed (54.9%), or like their life is worse than other people's (48.6%)
 - participants thought social media made some things worse, including grades in school (31.3%) and a negative body image (46%).²²

6. SCHOOL LEADER RESPONSE TO SOCIAL MEDIA

Schools are increasingly looking for advice and guidance to respond to incidents involving students and social media. Many of these incidents involve students being exposed to or sharing explicit sexual imagery. School leaders seek best practice to implement broad, proactive and whole-school approaches to keep students safe online and to prevent the harmful impacts of young people viewing explicit material shared via social media.

While many incidents occur outside of a school context, the impacts of these incidents affect all students at school. The use of age assurance would assist schools and families to protect students from harmful content found on social media.

¹⁹ Creating positive change, eSafety Commissioner, viewed 25 June 2024

²⁰ Digital lives of Aussie teens, eSafety Commissioner, 2021

²¹ Teachers' Essential Guide to YouTube, Common Sense Education, 2021

²² Adolescent Media Use: Attitudes, Effects and Online Experiences, Digital Wellness Lab, 2022

Schools have a critical role to educate students in how to remain safe online, yet the pace of digital change is challenging and schools have limited ability to influence outside of school hours. Children and young people are still learning discernment to assess social media content. It is of great concern that the eSafety Commissioner found that young people first encountered pornography at an average age of 13.23

The Association of Independent Schools of Australia (AISSA) conducted a survey of middle school leaders to seek the views of their member schools. The majority of survey responses showed that school leaders are looking for government action, agreeing that the government should explore age assurance further.

The overwhelming majority of school leaders surveyed agreed that the government should restrict Australian children's social media use. Over 70 per cent of survey respondents believed mobile phones and social media had a mostly negative impact on young people and the remaining 30 per cent stated that they had some negative impact. None indicated that social media had any form of positive impact.

Other themes and comments included:

- The need to support parents in the impact and consideration around issues of addiction, peer pressure and the role that governments should play in protecting young people from online harm.
- An overwhelming concern that young people have not yet developed the ability to discern what is appropriate content, nor the capacity to self-regulate social media use.
- Many respondents felt there was a direct connection between social media use and students having difficulty forming healthy relationships, sustaining focus in learning, and experiencing general mental health and wellbeing.
- The growing evidence base regarding the links between social media and addictive gaming. The role of social media in creating issues relating to negative body image were also raised as a concern.
- The prevailing issue around fake accounts and the sharing of explicit images and deepfakes.
- Many respondents reported an overwhelming impact on school life, despite many incidents occurring after school hours.

7. YOUNG PEOPLE'S PERSPECTIVES

Alongside the development of its 'safety by design' principles, the eSafety Commissioner asked young people to prepare a vision statement for online safety. Their collective vision statement emphasised the importance of user content controls, proactive scanning and filtering technology to reduce the spread of inappropriate content, and imposing sanctions and consequences for users violating the rules of online platforms. The statement also supports the use of verification to make sure accounts do not belong to bots so that users can be held accountable for their actions online.²⁴

Though young people have doubts about the efficacy of age assurance practices, they also think that pornography, dating and social media sites should use age assurance tools to restrict underage access to online porn. The eSafety Commissioner found that of the young people surveyed, 40 per cent thought that social media should use age assurance tools. When asked which age assurance methods were the most appropriate for accessing online pornography, the highest response was using official government documents, such as a driver's licence. However, 91 per cent of young people surveyed

²³ Accidental, unsolicited and in your face, eSafety Commissioner, 2023

²⁴ Safety by Design, eSafety Commissioner, 2019

expressed some level of concern about one or more of the age assurance tools suggested, indicating that there are divisive views on the best approach.²⁵

Research indicates that some forms of engagement with social media can positively affect civic engagement and political participation.²⁶ Student groups who seek to have a say in the political discourse of Australia, or voice their opinion on critical issues such as the environment, are likely to feel silenced if excluded from social media platforms. Other mechanisms will need to be established to ensure this group does not become disenfranchised and disconnected from political and social issues.

8. AGE ASSURANCE CHALLENGES

Introducing age assurance technology is incredibly challenging, due in part to the prevalence and accessibility of Virtual Private Networks (VPNs), privacy concerns, and the tech-savvy nature of younger generations of Australians.

In its review of age assurance technology to reduce children's access to online pornography, the eSafety Commissioner found that age assurance on its own is not enough to protect young people from being exposed to harmful material. However, they found that it can play a role in increasing the average age at which young Australians are exposed to harmful online content, at which point they are more able to critically analyse the content and better understand the context.²⁷

8.1 PRIVACY AND DATA SECURITY

Privacy has been raised as a significant concern in the implementation of age assurance processes. The eSafety commissioner's survey found that though 63 per cent of young people are concerned about privacy of personal information, they described some of the suggested approaches for age assurance as 'dystopian'. Some respondents also indicated that they were concerned the government would have access to their browsing habits.²⁸

If social media companies are required to collect and store additional personal data to verify a user's age (such as government ID, date of birth or address), there must be legislated requirements around the storage and retention of this data. Consideration should be given to the format the data is stored in, the access controls, the location of company servers and the company's history of data breaches.

The extent to which these issues will impact the efficacy of age assurance tools will depend largely on the selected approach to age assurance, as well as the amount of supporting information made available to educate the public on how these changes may affect their privacy.

8.2 EVASION

To be effective at minimising adolescent's access to harmful material on social media, age assurance tools and processes will need to be both easy to use and difficult to avoid for most young people. Young Australians may attempt to evade age assurance requirements by:

- Using a VPN to change their IP address and appear to be accessing the social media site from another country without the same age assurance requirements.
- Using an older sibling's or their parents' login details.

²⁵ Questions, doubts and hopes, eSafety Commissioner, 2023

²⁶ The Impacts of Social Media in Australia, Centre for Digital Wellbeing, 2021

²⁷ Roadmap for age verification, eSafety Commissioner, 2023

²⁸ Questions, doubts and hopes, eSafety Commissioner, 2023

- Migrating to smaller social media platforms which do not adhere to age assurance requirements. These are likely to have a lower level of moderation and security than the larger popular platforms.
- Deceiving the verification technology by using a fake name and/or identification.

As age assurance requirements will need to be met by users of all age groups, social media providers should ensure they provide multiple options for the user to meet the requirements. Some adults may not possess an acceptable form of ID, and others may be uncomfortable with the face scanning age estimation technology used by companies such as Meta.²⁹ By allowing users to select their preference, the incentive to circumvent the assurance procedures will be reduced, increasing security and accountability on social media platforms for all users.

Some social media platforms, such as TikTok and YouTube, do not require an account to be created to browse the platform. If young people are unable to bypass the age assurance requirements, they may simply opt to use these sites without an account. In some cases, this may result in young people encountering an increased amount of content that they find distressing or harmful, as in the past the algorithm would curate their suggestions based on their viewing history and age.

8.3 **DIGITAL SKILLS DEVELOPMENT**

Workplaces are placing increasing importance on the digital literacy of the workforce.³⁰ Concerns have been raised that if adolescents are not able to have a gradual introduction to social media sites and develop the digital competencies these platforms require, they will face a steep learning curve once they are old enough to access this content. 31 This may affect their employability in roles where these skills are a fundamental component of the job.

To address these concerns, any introduction of strict age requirements should be introduced alongside stronger digital literacy and resilience education for young people, so that they are adequately equipped with the appropriate skills to engage safely online.

9. CONCLUSION

Schools play a vital role in digital literacy education and safe online engagement, but there is more to be done to combat the risks to young people of social media use with an integrated government policy approach.

ISA's recommendations included in this submission focus on ensuring the safety of online environments for youth, the importance of digital literacy, and minimising the potential negative impact of social media on mental health. The Independent sector advocates for a collaborative approach involving governments, tech companies, schools, and families to protect and educate young people navigating the digital landscape.

ISA understands that the Commonwealth Government is currently undertaking a trial of age assurance technology to assess its viability in supporting the legislation of a social media minimum age requirement. We look forward to hearing the results of this trial and future recommendations so that the Independent school sector can continue to support online safety for students.

²⁹ Facebook is scanning some users' faces to verify age, SMH, 2024

³⁰ Digital Capability for Workforce Skills – Final Report, Australian Industry Standards, 2022

³¹ Social media age limits might be popular with politicians and parents, but experts warn they aren't simple, ABC, 2024

ISA would be happy to discuss our submission or be involved in further consultation.

Contact details Tracey Taylor Director, Education Policy tracey.taylor@isa.edu.au