Inquiry into Social Media and Online Safety

A submission to the:
Select Committee on Social Media and Online Safety

Prepared by:
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yourtown is a national organisation and registered charity that aims to tackle the issues affecting the lives of children and young people. Established in 1961, **yourtown's** mission is to enable young people, especially those who are marginalised, to improve their life outcomes. **yourtown** provides a range of face-to-face and virtual services to children, young people, and families seeking support. These services include:

- Kids Helpline, Australia's only national, free 24/7 telephone, webchat and email counselling and support service for 5- to 25-year-olds
- Employment and educational programs and social enterprises which support young people to re-engage with education and/or employment, including programs specifically for those in long-term unemployment
- Accommodation responses to young parents with children who are at risk, and to women and children seeking refuge from domestic and family violence
- Young Parent Programs offering case work, individual and group work support and child development programs for young parents and their children
- Parentline, a telephone and online counselling and support service for parents and carers
- Mental health service/s for 0- to 11-year-old children and their families with moderate mental health needs
- Expressive Therapy interventions for young children and infants who have experienced trauma and abuse, or been exposed to violence

Kids Helpline

In 2021, Kids Helpline counsellors responded to more than 3,991 children and young people worried about online safety issues, of which 13% expressed suicide-related concerns. Compared to other counselling contacts, eSafety issues were more likely to be from children under 18 years of age, with the youngest person to contact Kids Helpline with a concern or worry about online or texting activity 5 years old. Of Kids Helpline contacts disclosing cyber-safety issues, the most common accompanying concerns were bullying (identified in 29% of counselling sessions); emotional wellbeing (22%); peer/friend relationships (18%); mental health (17%); suicide-related concerns (13%) and dating and partner relationships (12%)

Being safe online is the top topic of interest for children aged 5- to 12- years old. In 2021, there were 2,756,507 unique visitors to the Kids Helpline website, collectively participating in 2,981,825 web sessions and a 4% increase in new users accessing the website compared with 2020. Being safe on the internet is the top topic of interest for children aged 5-12 years old (19,826 views); sexting (84,553 views) and cyber-bullying (75,000 views) are the 3rd and 4th top topics accessed by teens respectively; and the impacts of pornography (4,021 views) is the 3rd top issue accessed on the website by young adults aged 19-25 years. Our web resource on sexting is the third most frequently visited page in the Teens area on the Kids Helpline website.

Similar trends are reflected in sessions conducted by Kids Helpline at school. In 2021, Kids Helpline at High School delivered sessions on online safety and cyberbullying to 291 students. In the same year, Kids Helpline at primary school delivered sessions to 12,948 students, with a focus on topics such as cyberbullying; online safety; being kind online; and thinking about social media.

yourtown welcomes the House Select Committee's Inquiry into Social Media and Online Safety, and also for the opportunity to appear before the Committee at their public hearing on 21 December 2021. **yourtown** strongly supports measures that the Australian Government is pursuing via legislative, policy and service reforms into strengthening protections for children and young people who are vulnerable to abuse through online social media and other platforms. However, caution should be exercised in any actions taken so as not to negatively impact children and young people who use digital services to reach out for help and support, or to learn, be informed, and engage with the world around them. Responses to address online safety for children and young people should be focused upon prioritising the creation of 'child safe' online environments; requiring social media, online platforms, and digital services to protect and promote the rights of children and young people so that children of all ages, at all stages of development, are empowered to know, understand, and exercise their rights in a digital world.

Kids Helpline is Australia's only 24/7 national helpline for children and young people aged 5 to 25 years old. Since its establishment 30 years ago, Kids Helpline has become integral to the social support system for children and young people within Australia. **yourtown** and Kids Helpline also work closely with the eSafety Commissioner to ensure children and young people experiencing issues relating to cyber bullying or online safety can receive priority access to Kids Helpline web counselling support via the eSafety Commissioner's website, or through direct referral from the Commissioner's office. This partnership has led to sharing of knowledge between both **yourtown** and the eSafety Commissioner's office, and development of best practice approaches when supporting children and young people to raise online safety concerns.

In 2021, 3,990 (4.0%) of the 99,012 counselling contacts[1] responded to by Kids Helpline counsellors involved the client disclosing having experienced cybersafety issues. The most common help-seeking e-Safety concern was bullying (29%). Compared to other counselling contacts, e-Safety issues were more likely to be raised by children under the age of 18 and less likely to be raised by young people aged 19-25 years old. Of those who expressed cyber-safety concerns, 19% were aged 5-12 years old; 61% were aged 13-18 years old; and 20% were aged 19-25 years old.

Some of the key cyber-safety issues raised, include:
- Receiving unwanted contact;
- Participation in sexting;
- Bullying;
- Uncontrolled or excessive use of the internet (for example, gaming, social networking);
- Viewing of disturbing content;
- Disclosure of personal information (passwords, addresses etc.);
- Harassment, blackmailing, solicitation, or suspected grooming; and,
- The client's own online behaviour.

As Figure 1 below shows, the most common accompanying concerns regarding online safety were bullying (29%); emotional wellbeing (22%); Friend/peer relationships (18%); Mental Health

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[1] [Of 174,636 contacts answered]

concerns (17%); suicide related concerns (13%); dating and partner relationships (12%); and family relationship issues (11%).
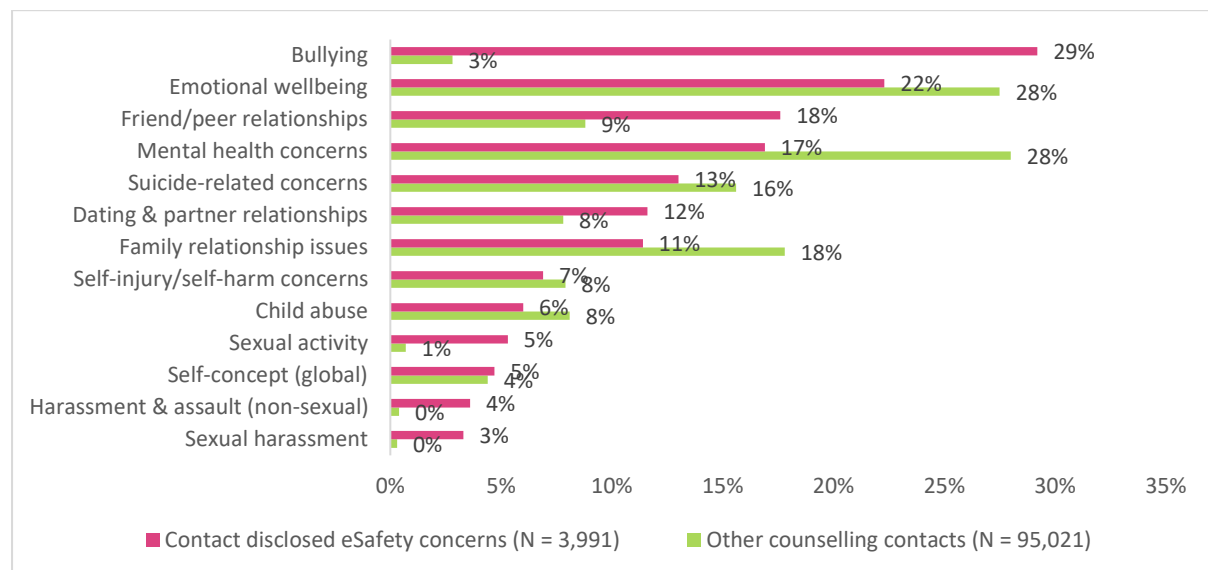

Figure 1. The most common accompanying concerns regarding online safety in 2021.[2]

There are three key terms of reference being explored by the Committee to which **yourtown** seeks to provide a more detailed response to, namely:

- The effectiveness, take up and impact of industry measures, including safety features, controls, protections, and settings, to keep Australians, particularly children, safe online;
- Actions being pursued by the Government to keep Australian's safe online; and
- The extent to which algorithms used by social media platforms permit, increase, or reduce online harms to Australians.

> **Recommendation 1:** Actions specifically directed towards keeping children and young people safe online should adopt a child rights approach and apply the 'best interests' principle as foundational to any overarching framework.

Keeping children safe online should be the responsibility of all online platforms, and organisations operating online in Australia. Any proposed regulatory action for online safety for children and young people should be focused upon prioritising 'child safe' online environments, placing the obligation upon digital service providers to provide and design services that are safe.

Any Government action to address online safety for children and young people should be undertaken from a 'child rights' perspective and aligned with the best interests' principle of Article 3 of the United Nations (UN) Convention on the Rights of the Child. This child rights approach reflects international best practice in supporting children and recognising and upholding their

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[2] **yourtown**. (2021). Kids Helpline Internal Data Set.

rights,[3] including their right to guide and support their online experiences. Children should have the right to access information, learning and expression, while also being safe online. However, the responsibility for ensuring the safety of children online should not be placed on children but should be the responsibility of digital service providers and online platforms.

These digital service providers should be obligated to actively engage with children and young people about how to be safe online and apply appropriate safeguards for the use of their services. Digital service providers should be responsible for providing the public information, and accessible and timely advice to children, and their parents/guardians regarding online safety and beneficial digital activities. It should be the responsibility of these services to adhere to the highest standard of ethics, privacy, and safety in relation to the design, engineering, development, operation and marketing of their products and services. One mechanism by which this could be achieved is by requiring digital service providers operating in Australia to meet the same safeguarding requirements as physical service providers, under the National Principles for Child Safe Organisations.

As part of this child rights approach, online protection should be integrated with other child safe policies and laws in the states and territories. These measures should ensure that young people are protected from risks (including cyber-aggression, and digital technology-facilitated and online child sexual exploitation and abuse), the investigation of such crimes is empowered and enforceable at law, and remedies and support available for children (as well as adults) who are victims of these crimes[4].

A child rights and best interests' approach would redirect and place the obligation of safety onto digital services, rather than children and young people. These services would be required to make genuine assessments of the risks of harm, and take reasonable steps to prevent harm, in terms of content and access, regardless of the age of the user – children, young person or adult alike - when accessing any online environment.

> **Recommendation 2:** Online safety actions developed by the Australian Government to keep children and young people safe should be:
> - based upon what children and young people have to say; and,
> - safety by design principles

The UN Committee noted in their general comment on children's rights in relation to a digital environment, that the children they consulted with in relation to their report told them that 'digital technologies were vital to their current lives and to their future'.[5] They wanted the digital environment to 'support, promote and protect their safe and equitable engagement'.

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[3] United Nations Child Rights Committee's General Comment No. 25 (Rights in a Digital World)
[4] Ibid., *General Comment No.25* paragraph 25
[5] Ibid., *General Comment No.25* paragraph 1

Any person, whether child, young person or adult impacted by actions taken by Government to keep them safe online, have the right to be involved and heard in how their rights and interests should best be protected, promoted, or limited. However, children and young people are often omitted from these consultation processes in design, creation and maintenance of safe online environments and their regulation. **yourtown** supports the establishment of the Online Safety Youth Advisory Council announced by the Prime Minister on 15 December 2021 enabling 20 young Australians aged between 13 to 24 to provide a direct voice to Government on the challenges and solutions to online safety issues.[6] However, to ensure that engagement is meaningful and representative of issues experienced across different age groups, cultures, and demographics (such as urban, rural and remote settings), steps should be taken to ensure a broader cohort than just 20 children and young people are engaged in the identification, development and implementation of any actions proposed to be taken; including those with lived experience of being unsafe or bullied online, ensuring that these young people are appropriately supported and engaged by experienced facilitators.

yourtown strongly recommends that any actions taken should implement 'Safety by Design' principles, placing the safety and rights of children and young people, and at-risk adults at the centre of any proposals to keep them safe online. Most platforms and technologies are designed following consultations with adults only, with platforms not built specifically with safeguarding of children or young people in mind. Young people and their input is critical in developing platforms where they 'feel safe' and 'are safe'. This approach will minimise harmful practices and measures that are not easily understood or navigated by end users. Ideally, children and young people should be able to gain the benefits of digital technology, for example, education and development, social connection especially during lockdown, and help-seeking, whilst minimising their exposure to online risks, such as harmful tracking.

> **Recommendation 3:** Online safety actions developed by the Australian Government should prioritise and fund prevention and education activities regarding online safety.

While user safety and rights should be at the centre of design and the development of online products and services, the focus should remain on prevention and education. Comprehensive online safety education remains a key approach to prevent online safety issues arising.

It is not clear what the real scale of online harm experienced by children and young people is. Many children and young people do not report the harmful content or issues they face online. This could be due to a lack of confidence that anything will be done about the issues they raise, with evidence suggesting that nearly a third of children say they sometimes do nothing when they are upset or worried about something online.[7] Anecdotal evidence obtained by **yourtown** also suggests that children may not speak up for fear their electronic devices will be removed, or they would lose online access.

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[6] A Voice For Young People On Online Safety | Prime Minister of Australia (pm.gov.au)
[7] Young people's views on reporting online harms | Childnet

Any online safety actions proposed by the Government should prioritise the funding of prevention activities, such as comprehensive online safety education programs in keeping with the eSafety Commissioner's Best Practice Framework for Online Safety Education.[8]

> **Recommendation 4:** The use of algorithms or artificial intelligence by social media platforms should be regulated and where permitted, required to meet ethical standards.

While artificial intelligence (AI) technology can be used unethically if not checked or regulated, AI can also be used beneficially to aid the education, safety, and support of children and young people online. Online safety responses can be enhanced by AI technology. While there should be greater scrutiny of the use and implementation of AI where its use is governed not only by regulation, but by ethical standards approved by recognised ethical bodies or committees, AI should be seen as a beneficial tool in its ability to identify risks or harm, respond and ensure online safety.

Children and young people should be educated and encouraged to participate in the development of AI that promotes and protects them online. If designed well and ethically, AI systems have the potential to mitigate harms and improve children's growth and wellbeing; provide mental health support; and improve their problem-solving skills. For example, AI technology can be used to identify harmful images or content posted online; or identify when a young person is potentially suicidal or requiring mental health support, prompting them with support they can contact online or in person.

Conclusion

We would welcome the opportunity to explore these ideas with you in further detail. Should you require any further information, please do not hesitate to contact Kathryn Mandla, Head of Advocacy and Research at **yourtown** via email at kmandla@**yourtown**.com.au.

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[8] Best Practice Framework for Online Safety Education | eSafety Commissioner