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AUSTRALIAN COMPETITION AND CONSUMER COMMISSION
Digital Platform Services Inquiry: Social media services

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AHISA Ltd is a professional association for Heads of independent schools. Our 450 members lead schools that collectively account for some 450,000 students, representing 70 per cent of independent sector enrolments and over 11 per cent of total Australian school enrolments. Some 20 per cent of Australia's total Year 12 students are educated in AHISA members' schools.

AHISA has a long-standing interest in social issues affecting children and young people, including the impact of media consumption on young people's health and wellbeing. We express this interest through advocacy to government¹ and membership of Children & Media Australia (CMA), and through delivery of information to members to support the education and pastoral care of students in their schools.

AHISA appreciates the opportunity to contribute to the ACCC's Digital Platform Services Inquiry in regard to social media services. We wish to record our support for the submission made by CMA, and also make the ACCC directly aware of some issues of ongoing concern to AHISA.

In its submission, CMA points to the need for government regulation to institute a 'safety by design' approach to minimise risks to social media consumers 'without shifting responsibility onto already overburdened parents and teachers'. While schools willingly accept their role in educating students on safe online media use (and actively engage in educating parents to support their efforts to minimise the risk of harm to their children), the sheer speed of technological and digital market development makes this role extremely challenging. Even if there is relative stability in the social media platforms used by students, it is impossible to predict the next high-risk behavioural trend, whether this be 'planking', smashing school toilets or, most recently, the 'blackout challenge'.

In addition to these trends are the long-term impacts on young people's body image issues (including eating disorders), suicide ideation, vaping and gambling and the effect of exposure to online pornography, cyber bullying by contemporaries and the views of influencers such as Andrew Tate – content delivered via social media apps and personalised via AI technology.

While age-based access limitations to social media platforms are a useful support to parents, they appear to have limited efficacy in controlling children's ability to establish social media accounts. As noted by Australia's National Children's Commissioner, children under the age of 12 are one of the two largest audiences of TikTok.²

Unless an industry 'safety by design' approach is regulated by government, children and young people will always be exposed to risk of harm, while parents, carers and schools will always be playing catch up.

CMA's submission also refers to the issue of children and young people's data privacy. In her article already noted, the National Children's Commissioner writes that information about children is harvested by social media and sold to advertisers for profit. She cites one estimate that 'by a child's 13th birthday, advertisers will have gathered on average more than 72 million data points about them'. It is such data that allows AI to feed personalised advertising to children and young people, just as AI feeds content to users of social media based on their previous usage.

The Australian Human Rights Commission sets out a range of recommendations for governments in its 2021 Human Rights and Technology Final Report³, including establishment of an AI Safety Commissioner as an independent statutory office. Given the increasing sophistication of AI, establishment of such an office may now be necessary to augment the role of the eSafety Commissioner, or consideration given to expanding eSafety and establishing the role of an AI Safety Commissioner within it, just as the Australian Human Rights Commission embraces Commissioners with responsibility for specific human rights issues.

Digital technologies are now so pervasive and evolving so rapidly, the federal government must establish an appropriate structure to support effective industry regulation and review as well as initiatives to protect and educate Australians, including Australia's children and young people.

Yours faithfully,

(Ms) Beth Blackwood

AHISA Chief Executive Officer

NOTES

- 1 AHISA's submissions are posted on its [website](#).
- 2 Hollonds, A (2021) 'Protect children from data surveillance', 27 July 2021. Accessed at <https://humanrights.gov.au/about/news/opinions/protect-children-data-surveillance>.
- 3 The *Human Rights and Technology Final Report* and an extract of its recommendations are posted at <https://tech.humanrights.gov.au/downloads>.