

October 9th 2024



Dear Prime Minister and Premiers,

Re: Proposed social media bans for children under 16-year olds

We write to you about the proposal to ‘ban’ children from social media until the age of 16-years-old. We understand the risks that social media has for children and young people, and these are well documented.

Addressing those risks requires a careful and evidence-based response that acknowledges the role that the digital world plays in contemporary childhood. The online world is a place where children and young people access information, build social and technical skills, connect with family and friends, learn about the world around them and relax and play. These opportunities are important for children, advancing children’s rights and strengthening development and the transition to adulthood.

Any restrictions in the digital world must therefore be designed with care and we are concerned that a ‘ban’ is too blunt an instrument to address risks effectively.

Some concerns include:

- **Bans affect rights to access and participation:** The UN Committee on the Rights of the Child states that ‘national policies should be aimed at providing children with the opportunity to benefit from engaging with the digital environment *and* ensuring their safe access to it.’
- **Parental consent does not fix unsafe products.** Placing requirements on parents to consent to the use of ‘unsafe’ products does not drive up safety.
- **Parents and carers often are not ‘the experts’, but will still be asked to make informed decisions.** Placing responsibility on parents to provide consent, without adequate guidance and support, is unfair. Not all parents will be able to manage the responsibility of protection in the digital world.
- **Implementing a ban effectively remains a challenge.** There are not yet effective techniques for age assurance nor to verify parental consent, and privacy concerns remain.
- **It creates even more risks for children who may still use platforms.** Platforms would be disincentivised from offering child safety features for any younger users that do still ‘slip onto’ a platform via ineffective age assurance.

- **It fails to drive up safety standards on platforms children will be allowed to use.** Some social media ‘type’ services appear too integral to childhood to be banned, for example short form video streamers. But these too have safety risks like risks of dangerous algorithms promoting risky content. A ban does not function to improve the products children will be allowed to use.

As an alternative, systemic regulation has the capacity to drive up safety and privacy standards on platforms for all children and eschews the issues described above. Digital platforms are just like other products, and can have safety standards imposed. We welcome the commitment to the development of a Children’s Privacy Code and the review of the enforceability of the Basic Online Safety Expectations.

There also needs to be a focus on supporting and empowering children, families and carers. A blanket ban will create a challenge for those children and young people who feel their access has been unfairly restricted. The work of keeping platforms responsible and building awareness of risk and responsibility amongst all users is a challenge but will provide longer term benefits.

Regards,

- **Australian Child Rights Task Force**
- **Professor Amanda Third**, Young & Resilient Research Centre, Institute for Culture and Society, Western Sydney University
- **Professor John Tobin**, Francine V McNiff Chair in International Human Rights Law, Melbourne Law School, University of Melbourne
- **Senior Professor Sue Bennett**, Deputy Director of the ARC Centre of Excellence for The Digital Child, University of Wollongong
- **Emeritus Professor Graeme Turner AO**, School of Communication and Arts, University of Queensland
- **Emeritus Professor Tony Bennett**, Institute for Culture and Society, Western Sydney University
- **Emeritus Professor David Rowe**, FAHA, FASSA, Institute for Culture and Society, Western Sydney University
- **Distinguished Professor Ien Ang**, Institute for Culture and Society, Western Sydney University
- **Professor Judith Bessant AM**, School of Design and Social Context, RMIT University
- **Professor John Hartley AM**, School of Art, English and Communications, University of Sydney
- **Professor Julian Sefton-Green**, School of Education, Deakin University



- **Professor Tama Leaver**, ARC Centre of Excellence for the Digital Child, Curtin University
- **Professor Jeannie Marie Paterson**, Melbourne Law School, University of Melbourne
- **Professor Daniel Johnson**, School of Computer Science, Queensland University of Technology
- **Professor Lelia Green**, School of Arts and Humanities, Edith Cowan University
- **Professor Marcus Carter**, Sydney Games and Play Lab, The University of Sydney
- **Professor Gerard Goggin**, Institute for Culture and Society, Western Sydney University
- **Professor Kate Douglas**, College of HASS, Flinders University
- **Professor Michael Dezuanni**, School of Communication, Queensland University of Technology
- **Professor Philippa Collin**, Young & Resilient Research Centre, Institute for Culture and Society, Western Sydney University
- **Professor Anita Harris**, School of Humanities and Social Sciences, Deakin University
- **Professor Rob Watts**, School of Design and Social Context, RMIT University
- **Professor Sarah Maguire**, InsideOut Institute for Eating Disorders, Faculty of Medicine and Health, University of Sydney
- **Professor Daryl Higgins**, Director, Institute of Child Protection Studies, Australian Catholic University
- **Professor Patrik Wikstrom**, Digital Media Research Centre, Queensland University of Technology
- **Professor Anthony McCosker**, Director of the Social Innovation Research Institute, Swinburne University of Technology
- **Professor Catharine Lumby**, Media and Communications, University of Sydney
- **Professor Axel Bruns FAHA**, Australian Laureate Fellow, Digital Media Research Centre, Queensland University of Technology
- **Professor Kerry McCallum**, Director, News & Media Research Centre, University of Canberra, Australia
- **Professor Sora Park**, News & Media Research Centre, University of Canberra
- **Professor Ingrid Volkmer**, Media & Communication, University of Melbourne
- **Professor Steven Howard**, Early Start and School of Education, University of Wollongong



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54 reasons



- **Professor Heather Horst**, Institute for Culture and Society, Western Sydney University
- **Professor Peta Mitchell**, Digital Media Research Centre and School of Communication, Queensland University of Technology
- **Professor Denis Byrne**, Institute for Culture and Society, Western Sydney University
- **Professor Kath Albury**, Department of Media and Communication, ARC Centre of Excellence for Automated Decision-Making and Society, Swinburne University of Technology
- **Professor Bob Hodge**, Institute for Culture and Society, Western Sydney University, NSW, Australia
- **Professor Louise Crabtree-Hayes**, Institute for Culture and Society, Western Sydney University
- **Professor Corrinne Sullivan**, Western Sydney University
- **Professor Larissa Hjorth**, RMIT University
- **Professor Tim Corney**, Youth & Community Research Group, Victoria University
- **Professor Natalya Lusty**, Professor of Cultural Studies, University of Melbourne
- **Professor Daniel Angus**, Digital Media Research Centre, Queensland University of Technology
- **Associate Professor Faith Gordon**, Australian National University
- **Associate Professor Julia Powles**, Director Tech & Policy Lab, University of Western Australia
- **Associate Professor Steven Threadgold**, Director of Newcastle Youth Studies Centre, University of Newcastle
- **Associate Professor Emma L. Briant**, School of Media, Film and Journalism, Monash University
- **Associate Professor Anna Bunn**, Curtin Law School, Curtin University
- **Associate Professor Amelia Johns**, School of Communications, University of Technology Sydney
- **Associate Professor Wonsun Shin**, School of Culture and Communication, University of Melbourne
- **Associate Professor Caroline Fisher**, University of Canberra
- **Associate Professor Julia Coffey**, Newcastle Youth Studies Centre, University of Newcastle



- **Associate Professor Dylan Cliff**, ARC Centre of Excellence for the Digital Child, University of Wollongong
- **Associate Professor Anna Copeland**, School of Law and Criminology, Murdoch University
- **Associate Professor Scott Griffiths**, University of Melbourne
- **Associate Professor Ivanka Prichard**, College of Nursing & Health Sciences, Flinders University
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- **Associate Professor Howard Sercombe**, Youth Work, Western Sydney University
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- **Associate Professor Charles Barbour**, School of Humanities and Communication Arts, Western Sydney University
- **Associate Professor Fiona MacDonald**, Centre of Excellence Young People and Disasters, Victoria University and Youth Affairs Council Victoria
- **Dr Patricia Edgar AM**, La Trobe University
- **Dr Holly Doel-Mackaway**, Macquarie Law School, Macquarie University, Sydney
- **Dr Jonathon Hutchinson**, Media and Communications, University of Sydney
- **Dr Catherine Page Jeffery**, Discipline of Media and Communications, University of Sydney
- **Dr Jacinta Sassine**, School of Law, Western Sydney University
- **Dr Rys Farthing**, Associate Investigator, ARC Centre of Excellence for the Digital Child
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- **Dr Justine Humphry**, Digital Cultures, Media and Communications, University of Sydney
- **Dr Lisa Archbold**, School of Law, Queensland University of Technology
- **Dr Hannah Jarman**, School of Psychology, Deakin University
- **Dr Amanda Levido**, Faculty of Education, Southern Cross University
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- **Dr Megan Lang**, Children's Policy Centre, Australian National University
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- **Dr Julia Cook**, Newcastle Youth Studies Centre, University of Newcastle
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- **Dr Adam Sargent**, School of Archaeology and Anthropology, Australian National University
- **Dr Fiona Robards**, Faculty of Medicine and Health, The University of Sydney
- **Dr Rachel Morley**, School of Humanities & Communication Arts, Western Sydney University
- **Dr Kathryn Daley**, Associate Director, Social Equity Research Centre, RMIT University
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- **Ren Galwey**, School of Culture and Communication, Faculty of Arts, University of Melbourne

International experts:

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- **Professor Eva Lievens**, Law & Technology, Ghent University, Belgium
- **Professor Simone van der Hof**, Center for Law and Digital Technologies (eLaw), Leiden University, The Netherlands
- **Professor EJ Renold**, School of Social Sciences, Cardiff University, UK
- **Professor Sun Sun Lim**, College of Integrative Studies, Singapore Management University, Singapore
- **Professor Elisabeth Staksrud**, Department of Media and Communication, University of Oslo, and Coordinator of the EU Kids Online research network
- **Professor Dr Jessica Taylor Piotrowski**, Amsterdam School of Communication Research, University of Amsterdam, The Netherlands
- **Professor Mizuko Itō**, Director, Connected Learning Lab, University of California, Irvine, US
- **Professor Rebecca Coleman**, Bristol Digital Futures Institute, University of Bristol, UK
- **Professor Manisha Pathak-Shelat**, Professor of Communication, MICA, Ahmedabad, India
- **Professor Justin W. Patchin**, Department of Political Science and Criminal Justice, University of Wisconsin-Eau Claire, US
- **Professor Emma Rich**, Department for Health, University of Bath, UK
- **Professor Rosalind Gill**, Goldsmiths College, University of London, UK
- **Professor Sara M. Grimes**, Wolfe Chair in Scientific and Technological Literacy, Department of Art History and Communication Studies, McGill University, Canada
- **Dr. danah boyd**, Author of "It's Complicated: The Social Lives of Networked Teens", US
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- **Dr Tijana Milosevic**, UCD Centre for Digital Policy, School of Information and Communication Studies, University College Dublin, Ireland
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- **Dr Ingrida Milkaite**, Law & Technology Research Group, Ghent University, Belgium
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- **Dr Ellyn Pueschel**, Center for Scholars & Storytellers @ UCLA, US
- **Dr Ioanna Noula**, UCD Centre for Digital Policy, University College Dublin, Ireland
- **Dr Sarah Coyne**, School of Family Life, Brigham Young University, US
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- **Dr Amie Kim**, Independent Researcher

International organisations:

- Cyberbullying Research Center, US
- The Net Safety Collaborative, US
- Centre for Social Research, India