Association *of* Heads of Independent Schools of Australia

28 June 2024

Secretary
Joint Select Committee on Social Media and Australian Society
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Inquiry into the influence and impacts of social media on Australian society

The Association of Heads of Independent Schools of Australia (AHISA) appreciates the opportunity to contribute to the Select Committee's Inquiry into the influence and impacts of social media on Australian society, with particular reference to the three terms of reference that have critical relevance to Australian school students:

> *(a) The use of age verification to protect Australian children from social media;*
> *(d) the algorithms, recommender systems and corporate decision making of digital platforms in influencing what Australians see, and the impacts of this on mental health; and*
> *(e) other issues in relation to harmful or illegal content disseminated over social media, including scams, age-restricted content, child sexual abuse and violent extremist material;*

ABOUT AHISA

AHISA Ltd is a professional association for Heads of independent schools.

The primary object of AHISA is to optimise the opportunity for the education and welfare of Australia's young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

AHISA's 480 members lead schools that collectively account for some 485,000 students, representing 70 per cent of independent sector enrolments and over 12 per cent of total Australian school enrolments.

AHISA's members lead a collective workforce of over 47,000 teaching staff and some 31,500 support staff.

AHISA recognises the urgent need to address the issues raised in the inquiry's terms of reference, in the interests of shoring up the safety and well-being of young Australians. This submission builds on research evidence about the impact of social media use by young people, including both the benefits and risks, and takes account of the experience of schools[i] in managing the well-being of their students.

The submission is consistent with AHISA's previous contributions to inquiries addressing the online safety of young people. We believe the protection of children should be paramount in any legislation regulating online safety and we advocate for strong legislative protections against the harmful effects of access by children to inappropriate and harmful content and overuse of social media. A higher level of online protection for children is warranted because young people's brain development makes them more vulnerable to some harms.

In addition to stronger regulation of social media platforms targeted at minimising the known risks of the digital environment for young people, AHISA would welcome more resources and support for educating parents and schools and young people so that young people can operate more safely in the online environment.

Social media and the mental health of young people

Research does seem to show that there has been an increase in recent years in mental health problems such as anxiety, depression, eating disorders and self-harm among young people. This is certainly a widely held public impression, and schools themselves are observing this trend, witnessing a lack of resilience among students and noting increased numbers of students presenting with generalised anxiety, school refusal, depression and social and emotional issues. While understanding that changes in the wider society have had an impact on students' well-being, and observing that students are "more familiar and comfortable with using the terms around mental health" and are "more likely to seek help when they are unable to cope with situations", schools have had to respond by significantly expanding their welfare and counselling services and broadening these to reach out to younger students.

Studies have identified numerous factors influencing an increase in reported anxiety and depression and self-harm among young people, including the aftermath of the Covid pandemic, a higher incidence of family problems and domestic violence, economic uncertainty, concern about climate change, and over-protective parenting. Scholarly studies recognise that youth mental health is a complex situation, "a multidetermined synergy between risk and resilience", influenced by family, peer group and social context as well as social media.[ii] The experience of schools attests to this complexity.

The popular view, informed by analyses such as that of Jonathan Haidt in The Anxious Generation[iii], with its explanatory subtitle *How the Great Rewiring of Childhood Is Causing an Epidemic of Mental Illness,* links the upturn in major depressive episodes and greater anxiety in US teens with social media use. In Haidt's detailed analysis however, in addition to the arrival of smart phones, numerous changes in approaches to parenting and children's lives over recent decades are also held responsible for influencing young people's mental health.

The weight of evidence establishes that the use of digital technologies is inherently neither harmful nor beneficial to young people – the impact depends on specific features of the social media environment and particular social media platforms, as well as individual circumstances.

It is not social media itself but aspects of it which pose risks for young people. Negative behaviours offline seem to carry over into digital environments. A longitudinal study in the UK[iv] found that further research was needed to understand the impact of social media on mental health, and highlighted the dangers of mental health interventions or prevention strategies focusing only on social media. The American Psychological Association sums up this position in its Health Advisory bulletin of May 2023: the effects of social media on young people "are dependent on adolescents' own personal psychological characteristics and social circumstances - intersecting with specific content, features, or functions that are afforded within many social media platforms."[v]

The specific features of the social media environment which are consistently identified as presenting risks to young people's mental health include the amount of time they spend on social media; the content they consume; any pre-existing vulnerabilities; and their cultural and socio-economic context.

Schools are at the forefront of witnessing both the positive and negative effects of social media. They see that students are enmeshed in the online world and that it is an essential element in their lives, educationally and socially. In depth analysis of the results of the 2022 PISA (Program for International Student Assessment) survey, the respected three-yearly study of how well young people, at age 15, are prepared for life and work conducted by the OECD, shows a positive connection between the use of digital technologies and academic performance:

> "it is good news that PISA shows the majority of students have embraced learning through digital technologies. . . about three out of every four students reported being confident using various technology, including learning management systems, school learning platforms and video communication programmes."[vi]

At the same time, the survey reveals some risks, showing that digital devices such as smart phones can distract from learning, expose students to cyberbullying and compromise their privacy, and can be highly addictive. Across OECD countries, 45% of students reported feeling nervous or anxious if their phones were not near them. Digital distraction in particular is linked to learning outcomes – students who used digital devices more than an hour a day for leisure saw a big drop in their maths scores.

Apart from education, children use social media for friendship, connection, engaging with culture, and having fun. Most young people themselves report positive experiences from their social media use. They see how they benefit from the opportunities that technology offers and they enjoy being online for learning, friendships and entertainment. Studies identify positive effects on mental health, such as the creation of networks and the social support these provide, and allowing young people to share experiences, connect with people with shared interests and experiences, and learn to express themselves.

On the other hand, the digital environment also has well known negative effects: distraction from schoolwork, family activities and exercise; disrupted sleep; exposure to misinformation and harmful content, including pornography; over-sharing of personal information; unrealistic body image; exposure to online predators, cyberbullying and a toxic culture; and addictive behaviours.

Schools are experiencing all these negatives and more. Sleep deprivation, which has a well-known negative effect on mental health, is a common problem schools have to deal with – students are tired, "zombie-like" in some instances; they lack concentration, they are distracted from schoolwork, "they don't read and they don't spend time with family and friends or in sports and activities that would boost their well-being". Social media encourages them to set unrealistic expectations of themselves, feeds anxieties such as the fear of missing out, and imposes the constant pressures of comparison and striving for approval. Schools are aware that, because of the nature of the online world, their students, even young pre-teenagers, are exposed to harmful content, including age-inappropriate, unkind, or aggressive material that can influence their perception of acceptable behaviour and language, "eroding their sense of right and wrong". Schools see evidence of addictive behaviours which have a visible impact on the time and effort students put into school work. They are finding that most incidents of bullying and harassment in school have a social media component, and that "social media heightens bullying and social exclusion". Increasingly their pastoral care role is related to the use of social media, "unravelling poor online behaviour", much of that occurring outside school hours but impacting on the school community and placing growing demands on staff time in order to deal with the fallout. They see that many students have unfiltered, unsupervised and unrestricted access to social media at home.

The risks

The experience in schools underlines the findings of research that the **content** young people see online – language, themes and images - is one of the main routes to harm. Content promoting self-harm or harm to others, pornography or violence, or content that encourages harmful behaviour such as eating disorders, has a direct impact on student well-being. Schools are called on to intervene in some content that is reportable to external authorities - to platforms, to police or to child protection authorities - but below that level, they see students exposed to polarising, discriminating, damaging and aggressive content, content that influences what they see as acceptable behaviour - "interactions online seem bolder, more cruel than students would do face-to-face", "the language used is more vulgar".

Schools see how this exposure to harmful content online is fuelled by the algorithms designed by social media platforms to increase engagement. These algorithms exacerbate the risk that young people will be exposed to harmful content and make it easier for children to stumble across harmful content and inappropriate marketing messages. Their impact on school-aged children can be confusing and problematic. Jonathan Haidt refers to the algorithmically curated news feeds adopted by some social media platforms which set up content designed to "hook kids". A study for OfCom[vii], the UK government communications regulator, found that recommender systems, providing personalised recommendations to users, were children's main pathway to harm online, with some platforms at higher risk of harmful content than others.

A well-recognised risk is access to **age-inappropriate** content by young children, a risk addressed through age verification requirements and parental controls, with varying degrees of efficacy. Schools are well aware that parents and students are ignoring the 13+ recommendations for social media. One school which surveyed students at the start of Year 7 found that "98.4% of the group had social media, but only 16% of the group were the required age, 13".

The **amount of time** young people spend online is also widely recognised as a risk factor for young people's mental health, with research showing that many adolescents spend an excessive amount of time online. Higher rates of time spent online are linked with symptoms of anxiety and depression as well as poorer academic performance. Young people appear to be more vulnerable to these pressures than adults. The Mayo Clinic reports that many but not all studies find that the time young people spend on social media is linked to a higher risk of poor mental health[viii], while an OECD study[ix] refers to the "Goldilocks hypothesis" – a moderate use of digital technologies tends to be beneficial while overuse is detrimental. Analysis of the 2022 PISA results showed that the more time students reported spending on digital devices at school, the lower their maths performance.

One response at the school level to the overuse of social media and addiction-like behaviour, in addition to strict rules around the use of school digital devices, has been the widespread introduction of policies to ban smart phones during school hours. Data from the 2022 PISA survey suggest that a ban of this kind can be effective in mitigating the risks of distraction and excessive use, although the evidence is that these bans are often not effectively enforced. The nature of the prohibition on phones varies, with some schools allowing varying degrees of access depending on age, and others having full bans. Schools however are finding that out-of-school social media activities are the biggest problems they confront, with staff "spending increasing amounts of time dealing with conflicts that arise online outside of school hours", and managing students suffering from sleep deprivation and poor concentration.

Addressing the risks of social media

While it is impossible to fully control the impact of social media on an individual, there is clearly a case to address the recognised harmful effects related to content, design features such as algorithms and recommender systems, online conduct, access and over-use, in order to protect young people. Measures need to respond to the known risks to children online, while recognising the many benefits of young people's social media use and the complexities of young people's mental health.

Parents, schools, media companies and government all have a part to play in reducing the known risks. Where regulation is involved however, there is a balance to be struck between society's duty of care for young people on the one hand and free expression, privacy and over-surveillance on the other. Protecting young people from exposure to unsuitable or harmful material and exploitation is paramount, in the interests both of the individual and society at large.

The case for government to play a role in the regulation of social media platforms to protect children from harm and set standards is clearly recognised across the world, as instanced by the recent spate of online safety legislation. The introduction of legislation in the UK, the USA, both federally and in numerous states, France, Germany, Canada, India, South Korea and Japan demonstrates that this is a global challenge and provides many examples of strategies and approaches from which to learn. The legislation enacted in the UK, the operation of OfCom, and recent proposals for strengthening provisions in the Online Safety Act 2023, seem to set a high standard of protection for children, imposing legal duties on social media platforms to make them safer for children, providing strong powers and penalties and setting high standards. Notwithstanding the already strict requirements in force in the UK, proposals for building even further on the ambition of the 2023 Act, including raising the access age to 16, are under active consideration. OfCom itself takes a zero-tolerance approach to protecting

children from online harm. Draft Children's Safety Codes, currently out for consultation, will make technology companies legally responsible for making sure their platforms are safe by design for children and include measures to ensure strong governance and accountability for children's safety within platforms.

Where global companies are having to respond to strong, enforceable provisions in one jurisdiction, it should be possible in others.

What should be asked of technology companies

Governments have the important role of setting acceptable standards for social media companies, requiring them to protect children and imposing consequences where they fail to do this. Legislation in force or in contemplation in other jurisdictions places a greater onus on companies to protect children from harmful content and mitigate risks by embedding protections in their products and services, and provides avenues for enforcement. Under legislation, companies hosting accounts are expected to take more control over the online exposure and activity of young people.

Given the scale of the issue of problematic social media use they are confronting, schools would welcome stronger legal controls. Such requirements would be targeted at:

- introducing robust age verification processes;
- limiting contact with and access to age-inappropriate content and filtering out the most harmful content from children's feeds;
- blocking access after excessive use, or introducing safety measures such as a 'take a break' tool;
- addressing abusive behaviour and flagging negative messages;
- faster responses to removing harmful content;
- regulating advertising and allowing users more control over their feeds to avoid unwelcome advertising and other material based on algorithms;
- installing effective content moderation systems and processes and safe search settings for children to filter out harmful content;
- analysing the design and functioning of their services, including their algorithmic systems to protect young users, and being transparent about them;
- creating invisible barriers around young users to protect their privacy, safety and security;
- introducing more effective, easier to use parental control systems, so parents are more aware of how and for how long their children are using social media platforms;
- introducing user controls and reporting functionalities giving young users the ability to set limits on who they see and interact with online, the option to restrict or remove contacts and the ability to anonymously report cyberbullying incidents to platforms;
- installing child-friendly grievance reporting channels;

Parents and schools would welcome stronger, legislatively based age requirements. The UK Act, for example, requires social media platforms to implement highly effective 'age estimation' or 'age verification' techniques and states that self-verification will no longer be sufficient. Schools would strongly support raising the access age to 15 or 16, as is under consideration in the UK, with rigorous age verification processes demanded of platforms.

What would help parents and schools in their role

Both parents and schools have a role in limiting the time young people spend on social media and educating them about online safety. A useful first step would be for government to spearhead a public education campaign, in the nature of the drink driving and smoking campaigns of the past, although clearly educational, not fear-based, making the wider community more aware of the dangers, risks and realities of young people's social media use and helping parents understand how to support good online behaviour.

Education and training for parents, schools and children will continue to be an important element of provisions to enable young people to safely navigate the digital environment. A significant investment in parent education, including the production of clear guidelines, would place parents in a stronger position to support and monitor their child's media use, especially if it was in conjunction with stronger parental control tools and an easier to use complaints and reporting system.

While schools willingly accept their role as key agents in helping students practise online safety and actively engage with parents to support their efforts to minimize the risk of harm to their children, the scale of the problem in schools and the speed of technological change make this role extremely challenging. Online safety has become an integral part of the operation of schools to the extent that it is making significant demands on teaching time and support services. Schools have responded by setting expectations about social media use for students and parents, developing codes of conduct for parents and students, running eSafety workshops, implementing policies and practices to limit bullying, including cyberbullying, regularly communicating with parents on technology issues, and supporting professional development for teachers on healthy phone and social media use. Online safety is generally taught explicitly to students. Schools would encourage the further development of materials and resources for teachers and special training courses to support these efforts.

Schools see their need to address problematic social media use as an increasingly significant element in their student well-being programs. More community and parental understanding of the issues and the empowerment of parents through the provision of guidelines and effective parental control tools would help schools meet the challenges they are facing. To quote one school, "we are really focusing our energy on a positive learning environment and a student code of conduct to impress upon our students the importance of high standards of behaviour in an attempt for this to translate across to social media and online platforms". A combination of high and enforceable expectations placed on social media platforms, public education, and a greater awareness of parental and individual responsibility is needed to underpin child safety online, in the interests of a healthier, more cohesive society.

AHISA welcomes any inquiries you may have about this submission. These may be directed to me at telephone (02) 6247 7300, or via email at ceo@ahisa.edu.au

Yours faithfully,

Dr Chris Duncan

AHISA Chief Executive Officer

NOTES

[i] The unattributed quotations in this submission are comments from school principals in response to an anonymous survey of member schools conducted by AHISA, 13-20 June 2024. The complete survey responses can be found here: https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions-2024/Social%20Media%20Impact.aspx

[ii] Cataldo, I, Lepri, B, Neoh, MJY and Esposito, G (2021) Social Media Usage and Development of Psychiatric Disorders in Childhood and Adolescence: A Review, Frontiers in Psychiatry, January 2021, Volume 11, Article 508595

[iii] Haidt, Jonathan, 2024, The Anxious Generation: How the Great Rewiring of Childhood is Causing an Epidemic of Mental Illness, Penguin UK

[iv] Plackett, R, Sheringham, J and Dykxhoorn, J (2023) The Longitudinal Impact of Social Media Use on UK Adolescents' Mental Health: Longitudinal Observational Study, Journal of Medical Internet Research 2023; 25: e43213

[v] American Psychological Association (APA), "Health Advisory on social media use in adolescence", May 2023, https://www.apa.org/topics/social-media-internet/health-advisory-adolescent-social-media-use.pdf

[vi] Schleicher, A, 2023, PISA 2022 - Insights and Interpretations, OECD, https://www.oecd.org/pisa/PISA%202022%20Insights%20and%20Interpretations.pdf

[vii] Reported in Ofcom, Tech firms must tame toxic algorithms to protect children online, 8 May 2024, https://www.ofcom.org.uk/online-safety/protecting-children/tech-firms-must-tame-toxic-algorithms-to-protect-children-online/#:~:text=Tech%20firms%

[viii] Mayo Clinic, 18 January 2024, Teens and social media use: what's the impact? https://www.mayoclinic.org/healthy-lifestyle/tween-and-teen-health/in-depth/teens-and-social-media-use/art-20474437

[ix] OECD (2024), "Mental health and digital environments", in OECD Digital Economy Outlook 2024 (Volume 1): Embracing the Technology Frontier, OECD Publishing, Paris, https://doi.org/10.1787/596e067d-en