

30 July 2025

Submission to Education and Workforce Committee

Inquiry into the harm young New Zealanders encounter online, and the roles that the Government, business, and society should play in addressing those harms.

By the Australian Research Council Centre of Excellence for the Digital Child

About the Digital Child

The ARC Centre of Excellence for the Digital Child ('Digital Child') is charged with leading national and global research, policy and practice to ensure that all Australian children are healthy, educated and connected in a rapidly expanding digital world.

The Digital Child is shaping an environment with children, families, and communities so they can navigate their own digital worlds. We know that children's lived experiences are rapidly changing, and that every childhood is now fundamentally digital. Our mission is to create positive digital childhoods for every child in Australia.

We do this by focusing on:

- Healthy digital lives, understanding how digital technology intersects children's lived experiences and providing guidance to families, educators, and policymakers as they navigate this space.
- Educational empowerment, equipping children with the skills they need to live their best digital lives.
- Safe digital spaces, making online engagement safer while promoting healthy digital relationships.

This submission provides a brief response to the inquiry. We would be pleased to provide further information, including an oral submission.

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Benefits of the online world

- Children demonstrate complex understandings of digital technologies, recognising their potential to connect with loved ones, support learning, and provide entertainment. They express awareness of the challenges and boundaries associated with digital use, highlighting the **importance of guidance and shared experiences with adults**.
- ReachOut Australia has found that 73% of young people use social platforms for **mental health** purposes with 66% of their survey participants reporting increasing awareness of their mental health challenges as a benefit of engaging with online content.
- Our researchers have described many positive outcomes of **learning digital skills** to navigate online and social environments. These skills help young people seek credible information to enhance their learning, and overall general knowledge, and—importantly—such skills can improve a better understanding of privacy protection, and coping strategies for dealing with online risks.
- For young people at **risk of isolation** due to where they live, disability, or social and cultural marginalisation, social media connects them to wider peer communities and social groups, in addition to staying more accessible to peers who live at greater distances. Therefore, social media helps alleviate the risk of isolation, and loneliness and contributes to better social and emotional well-being.
- Similarly, in study for UNICEF, our researchers discovered that **playing video games** can help boost children’s wellbeing in ways including making them feel competent, empowered and socially connected to others. These results were featured in a UNICEF report on the impact of gaming.

Risks of the online world

- Reset Australia’s survey of over 1,000 young Australians, and follow up focus groups, which found that young people overwhelmingly want stronger protections in the digital environment, including **stronger protections** to keep them safe from abusive and distressing content in the digital world.
- Social media platforms have failed to consistently put the best interests of children front and centre in their design choices and decision making. Change should come through **effective regulation** that is supported by robust evidence, developed through consultation with children, young people and their families about their everyday use and experiences.
- Rapidly changing technology can pose new risks for children and young people. For example, the world of AI is complicated and continually changing, with issues that impact on children and young people more than others. A recent report by our researchers focuses on nine challenges posed by Generative AI, including:
 - **Bias** - Indiscriminately harvesting data from many sources includes the biases inherent in these sources. Bias in often means bias back out again.

- **Copyright and Ownership** - while there are lots of legal questions about the training data, it's clear a lot of content was taken without permission or payment, which remains a big issue.
- **Environmental Cost** - the cost of a GenAI answer is significantly higher than other answers, including search. That adds up to a lot more power, water and other resources for these tools. In a world struggling with climate change, GenAI is making that struggle worse, not better.
- **Indigenous Data Sovereignty** - at present, Indigenous data is harvested indiscriminately, perpetuating the worst extractivist harms, and not giving Indigenous people a real say in how these tools are deployed.
- **Privacy** - these tools are all hungry for personal data in a range of ways, many of which are not made transparent to users.
- **AI Literacies or Critical AI Literacies?** - there's a vital difference between equipping young people to be AI tool users compared to having the literacy to evaluate the full costs and appropriateness (or not) of using these tools in the first place.

Interventions

- **Proposed social media bans are distracting us** from the real issue — how to make digital experiences better for children.
- There are **four overarching pillars** we can focus on, as a society, to improve children's online experiences:
 1. Set **standards** for high-quality digital experiences for children.
 2. Engage in slow design and decision-making processes driven by **consultation** with children.
 3. Create **child-centred** regulation and policy, and
 4. Deploy **media literacy** policy and programs.
- In addition, services likely to be accessed by children should be expected to demonstrate how they have considered the best interests of the child. They should have to demonstrate what they have done to ensure **the best interests of the child** informed the design, deployment and operation of their services.
- The UK Age-Appropriate Design Code includes a **standard on nudge techniques** and provides that services should 'not use nudge techniques to lead or encourage children to provide unnecessary personal data or weaken or turn off privacy protections.' In our recent submission on the Australian Children's Online Privacy Code, we suggest that Australia should include a similar standard and, in fact, that the requirement in the Australian code should go further and stipulate that entities should not use such techniques to encourage children to avoid engaging with privacy policies (such as, for example, where a box stating 'I have read, understood and agree to the privacy policy' is pre-ticked).