Response to the Statutory Review of the Online Safety Act 2021

Prevention United is a charitable organisation that focuses on promoting mental wellbeing and preventing mental health conditions from occurring, through efforts to positively change the balance of mental health risk and protective factors at a whole of population level. Prevention United welcomes the opportunity to respond to the *Statutory Review of the Online Safety Act.*

The digital world has become an integral part of our lives, and it offers many benefits, which are important to preserve. However, the online world also harbors some significant risks. A range of problems have been identified, many of which relate to social media channels. These include the type of content that is posted and distributed through these channels including disinformation, hate speech, misogynistic content, violent content, and extreme pornography; the way social media platforms work through their recommender systems and algorithms that increase the risk of excess screen time, addiction, and contribute to people being stuck in harmful 'echo chambers' that create social division; as well as data harvesting, information sharing and privacy concerns.

All of these problems are demonstrably real and there are growing concerns that the way social media operators manage their platforms is contributing to health and social issues in our community, including child abuse, intimate partner and family violence, mental health conditions, social division, and even the undermining of elections.

While we recognise the need to maintain open access to the considerable benefits offered through the online world, we also agree with the statement on page 7 of the issues paper that **"digital platforms clearly need to do more to make their services safer than they are today".** We therefore support efforts to enhance the Online Safety Act 2021 to strengthen regulators' ability to hold digital platform owners and operators to account, so that we can ensure that their commercial products are safe, and that they are they are not contributing to health, mental health and social problems that business, not-for-profits, and governments then have to deal with at their own or taxpayer's expense.

We are especially keen to ensure the safety of children and young people online, and we believe that the Act should consider their experiences as a priority. We support all efforts to enable young people to acquire the knowledge and skills they need to stay safe online, however, we do not believe that young people should be solely responsible for protecting themselves from toxic content online. Platform owners and operators must play a role. We appreciate the complexity involved in achieving an appropriate balanced approach, and we have recently produced a policy brief in conjunction with our youth advisory group (YAG) that discusses this issue in more depth (please see [The impact of screen time and social media on the mental health of young Australians](#)).

We are also keen to ensure that the Act is improved to cover specific issues of concern. From a mental health perspective, it is essential that the Act can help to prevent users being victims of child abuse, intimate partner violence/family violence, and bullying since they are all causes of mental health conditions and suicidality.

Child abuse is particularly toxic, and data from the recent Australian Child Maltreatment Study (ACMS) found that children who experience maltreatment are more considerably more likely to have a mental health condition such as depression, anxiety or substance abuse in adulthood. In addition, a study by Grummitt et al found that in Australia child maltreatment was causally responsible for 21% of all cases of depression, 24% of anxiety disorders, 27% of alcohol use disorder, 32% of drug use disorders, 39% of self-harm and 41% of suicide attempts.

Given the growing evidence that perpetrators are using online platforms to perpetrate child abuse it is vital that social media platform owners improve their mechanisms to prevent, and report child abuse that is happening through the use of their (commercial) products. At present, there is a genuine concern that platform operators are simply not taking appropriate steps to prevent these issues.

Intimate partner violence (IPV), including psychological, physical, and sexual abuse, is also a problem online. IPV is causally linked to a range of mental health conditions, such as anxiety, depression as well as with alcohol use disorders, self-inflicted injuries and suicide among women. [1, 2] Overall, in 2015 in Australia, IPV contributed 19% each to the burden of injury and illness associated with depressive disorders, self-inflicted injuries and suicide, and 12% of the anxiety disorders burden in females. [3]

Bullying, which includes cyberbullying, is defined as any aggressive behaviour that is intended to harm, is repetitive in nature, and involves a clear power imbalance between perpetrator and victim. [4] Homophobic bullying refers to bullying that targets lesbian, gay, bisexual, transgender, and questioning (LGBTQ) individuals based on the victim's perceived or actual sexual orientation. [5]

Bullying and cyberbullying victimization in children and adolescents is associated with a wide range of adverse mental health outcomes among young people such as depression and anxiety, and suicidal ideation and attempts. Moreover, appearance-related bullying is associated with an increased risk of eating disorders. [6, 7]

Bullying in childhood or adolescence can also impact adult mental health. Overall, it is estimated that 7.8% of the burden of anxiety disorders and 10.8% of the burden of depressive disorders in Australia is attributable to bullying victimisation. [8] Globally, bullying accounts for 5% of all disability adjusted life years (DALYs) associated with anxiety disorders and 3.7% of all major depressive disorder DALYs. [8]

Mental health conditions are distressing, and potentially disabling. They are linked to an increased risk of death by suicide, and create significant costs to the individual, community and the economy. It is therefore critical that we take all steps that we can to prevent mental health conditions from occurring in the first place. This means that we need to prevent the things that cause mental ill-health, wherever we can. The review of the Online Safety Act 2021 provides a perfect opportunity to improve the way that way that we prevent child abuse, intimate partner violence, bullying and other mental health harms online and we need to seize that opportunity.

From this perspective, Prevention United supports the position put forward by the Allanah and Madeleine Foundation in its submission to the eSafety Commissioner on this issue. Specially, the Foundation states that industry safety standards should:

- Require providers which use end-to-end encryption to demonstrate that the actions they take to detect and remove child sexual abuse material are meaningful and effective.
- Require that programs funded by providers to detect and deter child sexual abuse material are effective and not tokenistic.
- Require that services have clear, accessible, age-appropriate mechanisms for children to report illegal content themselves if they wish and be connected to appropriate professional support.
- Ensure all service providers are bound by the highest standards for reporting child sexual exploitation in Australian jurisdictions. The proposed reporting threshold of 'evidence of a serious and immediate threat to the life or physical safety of a person in Australia' is too high to capture a lot of child sexual exploitation.

For further information please see - standards-submission-from-Alannah-and-Madeline-Foundation.pdf (esafety.gov.au).

Prevention United also supports the request from the Allanah and Madeleine Foundation that the Australian Government amend the Online Safety Act to require that industry safety standards be led in the future by an independent regulator, who can put children's best interests first. Industry self-regulation or the current 'co-regulatory' approach are not doing enough to keep young people safe.

Digital technology is embedded in young peoples' lives and it is unlikely that they or any other age group will stop using digital technology anytime soon. All Australians deserve to have safe experiences online and we therefore support moves to better regulate social media and big tech giants to ensure that they play their role in preventing Australians from being exposed to harmful content, which may contribute to the onset of mental health conditions.

References

1. Lagdon, S., C. Armour, and M. Stringer, *Adult experience of mental health outcomes as a result of intimate partner violence victimisation: a systematic review.* Eur J Psychotraumatol, 2014. **5**.

2. Devries, K.M., et al., *Intimate partner violence and incident depressive symptoms and suicide attempts: a systematic review of longitudinal studies.* PLoS Med, 2013. **10**(5): p. e1001439.

3. Australian Institute of Health and Welfare. *Australian Burden of Disease Study 2015: Interactive data on risk factor burden.* . 2019   [cited 2022 14 June]; Available from: https://www.aihw.gov.au/reports/burden-of-disease/interactive-data-risk-factor-burden/contents/child-abuse-and-neglect.

4. Gaffney, H., M.M. Ttofi, and D.P. Farrington, *Evaluating the effectiveness of school-bullying prevention programs: An updated meta-analytical review.* Aggression and Violent Behavior, 2019. **45**: p. 111-133.

5. Moyano, N. and M.d.M. Sánchez-Fuentes, *Homophobic bullying at schools: A systematic review of research, prevalence, school-related predictors and consequences.* Aggression & Violent Behavior, 2020. **53**: p. N.PAG-N.PAG.

6. Solmi, M., et al., *Risk factors for eating disorders: an umbrella review of published meta-analyses.* Braz J Psychiatry, 2021. **43**(3): p. 314-323.

7. Tran, H.G.N., et al., *Cyber-Victimization and Its Effect on Depression in Adolescents: A Systematic Review and Meta-Analysis.* TRAUMA VIOLENCE & ABUSE, 2021.

8. Jadambaa, A., et al., *The contribution of bullying victimisation to the burden of anxiety and depressive disorders in Australia.* Epidemiol Psychiatr Sci, 2019. **29**: p. e54.