

**27 June, 2024**

## **Submission to the Joint Select Committee on Social Media and Australian Society**

PlayHouse, an Australian-based social media platform, welcomes the opportunity to provide a submission to the Joint Select Committee on Social Media and Australian Society. Our platform champions creator empowerment, safety, and ethical content monetisation. We understand the transformative power of social media, but also recognise the inherent risks it poses, particularly to vulnerable groups like children and adolescents. Our platform is committed to fostering a safe, inclusive, and equitable digital environment for all users. This submission will address key areas within the Committee's Terms of Reference, offering insights and recommendations informed by our expertise, industry experience, and commitment to fostering a safer, more equitable digital landscape, while also highlighting the need for an Australian Online Safety Alliance (AOSA).

### **The Use of Age Verification to Protect Australian Children from Social Media:**

PlayHouse strongly advocates for raising the minimum age for social media access to 18. This position is firmly grounded in scientific evidence demonstrating the profound impact of social media on the developing adolescent brain. Research published in *JAMA Pediatrics* reveals that adolescents who engage with social media for over three hours daily are twice as likely to experience depression and anxiety compared to non-users. The Australian Institute of Family Studies further cautions that excessive social media use can disrupt sleep patterns, impair cognitive function, and foster addictive behaviors in young people. These effects mirror the neurological and psychological impacts observed in cases of substance and alcohol abuse, underscoring the need for heightened protection for young minds.

The prefrontal cortex, responsible for impulse control, decision-making, and emotional regulation, continues to develop well into a person's twenties. Exposure to the constant stimulation, social comparison, and potential for cyberbullying on social media can disrupt this crucial developmental process, leading to long-term consequences for mental health and well-being. As highlighted in the submission by Dr. Sian McLean, social media content often promotes unrealistic appearance ideals and unhealthy weight control behaviours, contributing to body dissatisfaction and eating disorders. The risks are particularly pronounced for young girls, who are more likely to experience body image concerns and engage in harmful dieting behaviours due to social media influence.



Current age verification methods are woefully inadequate. The alarming ease with which a “child” was able to bypass an AI-powered age verification tool to “purchase” a knife, as detailed in a Crikey investigation, exposes the critical flaws in existing systems. PlayHouse proposes a multi-pronged approach to age verification:

- 1. Advanced AI-Powered Verification:** Implement sophisticated AI algorithms that analyse multiple data points, including facial features, voice patterns, and behavioural biometrics. This multi-modal approach significantly enhances accuracy and thwarts attempts to circumvent age restrictions. For instance, voice analysis can detect subtle vocal cues that are difficult to fake, while behavioural biometrics can analyse typing patterns or mouse movements to identify inconsistencies.
- 2. Blockchain-Based Digital Identity:** Explore the development of a decentralised, blockchain-based digital identity system. This would empower users with greater control over their personal data while enabling secure and tamper-proof age verification. By leveraging the immutability and transparency of blockchain technology, we can create a system that is resistant to fraud and manipulation.
- 3. Zero-Knowledge Proofs:** Utilise zero-knowledge proofs, a cryptographic technique that allows age verification without revealing the user’s specific birthdate. This innovative approach balances the need for verification with the protection of sensitive personal information. For example, a user could prove they are over 18 without disclosing their exact date of birth, enhancing privacy while ensuring compliance with age restrictions.
- 4. Collaboration and Standardisation:** Foster collaboration between government, industry, and technology providers to develop standardised age verification protocols that are both effective and privacy-conscious.

#### **The Decision of Meta to Abandon Deals under the News Media Bargaining Code:**

Meta’s decision to withdraw from the News Media Bargaining Code, while concerning, presents an opportunity to reassess and strengthen the regulatory framework. PlayHouse recommends expanding the Code’s scope to encompass all major platforms, not just Meta. This would ensure a level playing field and prevent platforms from selectively negotiating deals, as seen with Google’s exclusion of certain publishers like Business News Australia. The current voluntary nature of the Code allows platforms to cherry-pick partners, leaving smaller and independent publishers at a disadvantage.



Moreover, the Code should incentivise not only financial compensation but also responsible content moderation. Platforms should be held accountable for the quality and accuracy of news content they disseminate, with penalties for amplifying misinformation or suppressing legitimate journalism. This approach would foster a healthier media ecosystem and protect the integrity of information, aligning with the concerns raised by The Conversation regarding the decline in trust and the rise of AI-generated fake news.

### **The Important Role of Australian Journalism, News, and Public Interest Media in Countering Mis and Disinformation on Digital Platforms:**

PlayHouse recognises the indispensable role of journalism in upholding democratic values and combating the spread of misinformation and disinformation. However, the dominance of social media platforms and their opaque algorithms have created an uneven playing field, threatening the financial viability and reach of quality journalism. The Reuters Institute's Digital News Report 2024 reveals that traditional media continue to lose consumers to social media platforms, where discerning trustworthy sources becomes increasingly difficult.

To support Australian journalism, PlayHouse proposes:

- 1. Direct Funding:** Establish a dedicated public interest journalism fund to provide financial support to independent and smaller news outlets, ensuring their survival and capacity to produce high-quality, fact-checked content. This funding could be sourced from a levy on digital advertising revenue or through direct government grants.
- 2. Algorithm Transparency:** Mandate that platforms disclose their algorithms and how they prioritise news content. This transparency would empower news outlets to optimise their content for better reach and hold platforms accountable for fair and equitable distribution. Additionally, platforms should be required to provide clear explanations for any changes to their algorithms that may impact news visibility.
- 3. Media Literacy Education:** Invest in comprehensive media literacy programs across all levels of education, from primary school to adulthood. These programs should equip Australians with the critical thinking skills necessary to evaluate information sources, identify misinformation, and engage responsibly with news content. This includes teaching students how to assess the credibility of sources, recognise bias, and understand the potential impact of sharing information online.



## **The Algorithms, Recommender Systems, and Corporate Decision Making of Digital Platforms in Influencing What Australians See, and the Impacts of This on Mental Health:**

The opacity of social media algorithms and their potential to create echo chambers and amplify harmful content is a pressing concern. Research by Dr. Sian McLean and the Australian & New Zealand Academy for Eating Disorders (ANZAED) has highlighted the correlation between social media use and body dissatisfaction, eating disorders, and other mental health issues. The constant exposure to idealised body images and unhealthy weight control behaviours can have a detrimental effect on young people's self-esteem and mental well-being.

PlayHouse recommends the following measures to address these concerns:

- 1. Algorithm Audits:** Mandate regular, independent audits of platform algorithms to assess their impact on mental health, the spread of misinformation, and the promotion of harmful content. These audits should be conducted by experts with no financial ties to the platforms being audited, ensuring impartiality and objectivity.
- 2. Algorithm Reset Functions:** Empower users with the ability to easily reset their recommender algorithms, breaking free from filter bubbles and echo chambers. This would expose users to a wider range of perspectives and reduce the risk of radicalisation or exposure to harmful content. Platforms could offer this as a simple, one-click option within their settings.
- 3. Content Filtering Options:** Provide users with robust tools to filter out potentially harmful content, such as graphic violence, hate speech, or content that promotes self-harm or eating disorders. These filters should be customisable, allowing users to tailor their experience based on their individual needs and preferences.

## **Other Issues in Relation to Harmful or Illegal Content Disseminated over Social Media:**

PlayHouse acknowledges the wide range of harmful and illegal content disseminated on social media, including scams, age-restricted content, child sexual abuse material, and violent extremist material. The eSafety Commissioner's submission highlights the alarming prevalence of cyberbullying and online harassment, particularly targeting women and marginalised groups. The National Eating Disorders Collaboration (NEDC) further emphasises the dangers of pro-eating disorder content and the need for greater support for parents and schools in addressing these issues.



While we have taken proactive measures to combat such content on our platform, including partnering with international organisations like NCMEC and StopNCII, and voluntarily adhering to stricter US and UK laws regarding content moderation, we recognise the urgent need for a more comprehensive and robust legal framework in Australia.

We recommend the following actions:

- 1. Establishing a National Platform:** Create an Australian equivalent to NCMEC and StopNCII to facilitate the reporting and removal of child sexual abuse material, revenge porn, violent extremist material and other harmful content. This platform should be adequately funded and staffed to effectively address the scale of the problem, with clear guidelines for reporting and responding to illegal content.
- 2. Criminalising Image-Based Abuse:** Enact specific legislation to criminalise image-based abuse, including the non-consensual sharing of intimate images ("revenge porn"). This legislation should provide clear definitions, strong penalties, and support services for victims, ensuring that perpetrators are held accountable for their actions.
- 3. Strengthening Online Safety Laws:** Update the *Online Safety Act 2021* to encompass emerging threats like deepfakes and synthetic media, which can be used for harassment, exploitation, and the spread of misinformation. The Act should also include provisions for mandatory reporting of child sexual abuse material and other illegal content by platforms, with significant penalties for non-compliance.

#### **Related Matters:**

PlayHouse believes that a holistic approach to online safety requires addressing not only harmful content but also the broader ecosystem of social media platforms and their impact on users. We propose the following additional measures:



- 1. Mandatory Safety and Transparency Centers:** Require all social media platforms to establish comprehensive safety and transparency centers, providing users with:
  - Easily accessible resources on online safety, mental health, and well-being, including information on cyberbullying, online harassment, mental health support services, and digital literacy tips.
  - Clear and transparent reporting mechanisms for harmful content, with timely feedback on the outcomes of investigations. This should include information on the actions taken, the reasons for those actions, and the option to appeal decisions.
  - Direct contact channels for user support and assistance, including phone and email support, with clear response time expectations.
- 2. Independent Regulatory Oversight:** Empower an independent regulatory body, such as an expanded eSafety Commissioner's office, to oversee the social media industry, enforce compliance with online safety standards, and impose meaningful penalties for non-compliance. This body should have the authority to conduct audits, investigations, and public hearings, ensuring that platforms are held accountable for their actions and inaction.
- 3. Research and Data Access:** Mandate that social media platforms provide researchers with free and unbiased access to anonymised data to facilitate research on the societal impact of social media. This research is crucial for informing evidence-based policy decisions and understanding the complex interplay between social media and mental health, misinformation, and other societal issues. The data should be made available in a standardized format to ensure comparability across platforms and studies.

### **The Australian Online Safety Alliance (AOSA):**

PlayHouse is proud to spearhead the formation of the Australian Online Safety Alliance (AOSA), a coalition of industry stakeholders, policymakers, and advocacy groups committed to collaboratively addressing the complex challenges of online safety. The AOSA will advocate for legislative reform, promote industry best practices, and educate the public on digital safety. We believe that a united front, as envisioned by the AOSA, is essential to create a safer and more equitable digital environment for all Australians.



**Conclusion:**

PlayHouse is committed to working with the Australian government, industry partners, and civil society organisations to create a safer and more equitable digital landscape. We believe that the recommendations presented in this submission represent a comprehensive and effective approach to addressing the multifaceted challenges of social media. We urge the Joint Select Committee to carefully consider these proposals and take decisive action to protect all Australians in the digital age.

**Yours sincerely,**

**William O'Halloran**

Chief Executive Officer  
PlayHouse