Committee Secretary

Senate Standing Committees on Environment and Communications
Inquiry into the Online Safety Amendment (Social Media Minimum Age) Bill 2024

Parliament House

Canberra ACT 2600

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Dear Committee Secretary

Advocacy for Inclusion welcomes the opportunity to make a brief submission to this Inquiry.

**About us**

Advocacy for Inclusion (AFI) is an independent organisation delivering reputable national systemic advocacy informed by our experience in individual advocacy and community and government consultation. We provide dedicated individual and self-advocacy services, training, information and resources in the ACT.

As a Disabled People’s Organisation, the majority of our organisation, including our Board of Management, staff and members, are people with disabilities. AFI speaks with the authority of lived experience. It is strongly committed to advancing opportunities for the insights, experiences and opinions of people with disabilities to be heard and acknowledged.

AFI operates under a human rights framework. We uphold the principles of the United Nations Convention on the Rights of Persons with Disabilities and strive to promote and advance the human rights and inclusion of people with disabilities in the community. AFI is a declared public authority under the Human Rights Act 2004.

**Social isolation, connection and young people with disability**

Our submission is informed by a number of issues, including the accessibility and availability of social media platforms as a communication, connection and accessibility tool for people with disability and the experience of social isolation by people with disability.

The evidence base on social isolation by people with disabilities needs improvement, but what we do know indicates that boredom, loneliness and isolation are recurrent experiences by people with disability.

Over the past twenty years, the prevalence of loneliness has been greater among people with disability in Australia. Preliminary research using the Household, Income and Labour Dynamics in Australia (HILDA) has indicated that people with disability are **1.5 to 1.9 times** more likely to experience loneliness than people without disability.[[1]](#footnote-2) It also shows more than 1 in 4 people with disability reporting loneliness. In 2020, the prevalence of loneliness was considerably higher for people with intellectual and learning disability, psychological disability, brain injury or stroke, compared to sensory and speech, physical, or ‘other’ disability.

Work by the ABS, including [Social Participation of People with a Disability, 2011](https://www.abs.gov.au/ausstats/abs%40.nsf/Latestproducts/4439.0Main%20Features12011?opendocument&tabname=Summary&prodno=4439.0&issue=2011&num=&view=) shows lower participation in just about every domain:

* Over 37,000 people with disability don't leave their homes.
* Many people don't take part in sport and people with intellectual or physical disability reported a lower attendance at sporting events (31 and 41 per cent respectively), compared to people who didn't have a disability (58 per cent).
* People go out less - whether visits to parks, attending community arts activities or going to the movies.
* People have fewer friends and are more likely to nominate a family member they could rely on than friends. They also had fewer people they could rely on in an emergency.
* People are also less likely to attend community events whether they live in city, regional or remote. And if they do people are much more likely to participate in groups with a health/welfare focus which may be related to care and support arrangements.

Reasons included costs, a feeling of nowhere to go, lack of transport, no carer to go with, no companions or friends, and fear and anxiety. Safety was also mentioned, including the possibility of not having someone else around to provide help in the case of a mishap, such as a fall.

The COVID-19 pandemic, resulting policy actions (and inactions) pertaining to national lockdowns, social distancing, and the continued shielding of at-risk persons have also exacerbated loneliness and reduced social contact for people with disability.[[2]](#footnote-3)

In the ACT, people with disability reported a lower sense of belonging in the community.[[3]](#footnote-4) As indicated by the ACT Wellbeing Framework, a sense of belonging corresponds to a capacity to access support during difficult times and give support to others. People with disability also report a lower sense of inclusion in their local community. Finally, people with disability were almost twice as likely to have experienced discrimination in the ACT in the past 12 months. The data emerging from the ACT Wellbeing Indicators demonstrates the heightened risk of loneliness and social isolation for people with disability in the ACT.

A [2015 submission](https://assets.summerfoundation.org.au/pdf_offload/2015/11/Summer-Foundation-Senate-Inquiry-Submission_lo.pdf) by the Summer Foundation to the Senate Inquiry into the circumstances of younger people with disability in aged care stated that 21 per cent of younger people in nursing homes *never* go outside, 34 per cent never participate in activities such as shopping, leisure or visiting friends and family, and 53 per cent receive a visit from a friend *less than once a year*.

**Unintended consequences from the legislation**

As we understand it, the legislation would require social media providers to install age verification technology on social media applications including Facebook, Twitter, Instagram and Tik Tok while retaining access to some messaging Apps. People under 16 years of age would be unable to use these apps.

AFI is concerned that the removal of access to social media platforms to children and young people with disability may have unintended consequences. These platforms have a distinct value proposition for children and young people as follows:

* As a tool for connection by young people with disability who may be restricted from face-to-face connection, especially in ongoing COVID-19 circumstances
* As an alternative platform/pathway to completing education and youth development activities for people with limitations/reasonable adjustment needs
* As a way to locate and join with supportive diagnostic information and peer support (which the NDIS review said is a Foundational Support layer)
* As a way to find information about disability providers, including real world experiences and risks reported by other consumers
* In generating and amplifying accessible online creative content
* In receiving disability advocacy and information about disability advocacy
* As another channel for reporting abuse or neglect for children and young people who cannot communicate by speech or might be in closed settings

Advocacy for Inclusion is not in a position to comment on online risk factors for young people and children with a disability within this submission.

However, we note that the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability made 222 recommendations on how to improve laws, policies, structures and practices to ensure people with disability live free from violence, abuse, neglect and exploitation.

While the Royal Commission did not recommend age restrictions on social media, its hearings did highlight the risks people with disability face due to a lack of access and contact with spaces, places and communities that can detect abuse and hear people's cries for help.

It also highlighted the need for action on restrictive practices, guardianship reform, inclusive education and a range of protective mechanisms and investments, including family support.

In summary, we do not support a blanket removal of access to social media for people with disability under 16 years of age.

This risks unintended negative consequences for children and young people with disability and it does not address the causes of abuse, violence and assault identified by the Royal Commission.

More time is needed to understand, balance and address the risks and benefits of social media for children and young people with disability. On that point we note this submission has been prepared under significant time constraints, with only one day provided for public comment.

Disabled people and Disabled Persons Organisations (DPOs) require adequate time to consult with their members and prepare considered, thorough responses to ensure our voices are fully represented.

We urge the government to recognise the importance of inclusive consultation processes that allow sufficient time for engagement and robust contributions from disabled people and their representative organisations on consequential matters.

This Submission is endorsed by the [Youth Coalition of the ACT](https://www.youthcoalition.net/).

Please feel free to contact me on 0477 200 755 or craig@advocacyforincusion.org to discuss this submission.

Regards



Craig Wallace

Head of Policy

Advocacy for Inclusion

22 November 2024

1. Bishop, G.M., Llewellyn, G., Kavanagh, A.M., Badland, H., Bailie, J., Stancliffe, R., Emerson, E., Fortune, N. and Aitken, Z., 2023. [Disability-related inequalities in the prevalence of loneliness across the lifespan: trends from Australia, 2003 to 2020](https://assets.researchsquare.com/files/rs-3201287/v1/23cf9f0d-bbf1-4c45-8646-b135ccb7bf77.pdf?c=1692740045). Preliminary research. [↑](#footnote-ref-2)
2. Australian Institute of Health and Welfare, 2022, [People with disability in Australia 2022: In brief.](https://www.aihw.gov.au/getmedia/d4f8b523-a6e9-427f-a88e-31cb1b61dc3b/aihw-dis-81-people-with-disability-in-australia-2022-in-brief.pdf.aspx?inline=true) p. 31. [↑](#footnote-ref-3)
3. See, <https://www.act.gov.au/wellbeing/explore-overall-wellbeing/identity-and-belonging/sense-of-belonging-and-inclusion> [↑](#footnote-ref-4)