



30 April 2023

The Secretariat

National Early Years Strategy

By email to: [earlyyearsengagement@dss.gov.au](mailto:earlyyearsengagement@dss.gov.au)

**SUBMISSION TO THE DEPARTMENT FOR SOCIAL SERVICES**

**ON THE EARLY YEARS STRATEGY DISCUSSION PAPER**

Thank you for the opportunity to provide input to the development of this very important strategy.

Children and Media Australia (CMA) urges the Committee to take note of the impact that screen use and content are having on the development of Australian infants and young children, and to make robust recommendations that ensure that such experiences support the healthy development of young children and do not hinder it.

CMA is a peak not-for-profit national community organisation whose mission is to support families, industry and decision makers in building and maintaining a media environment that fosters the health, safety and wellbeing of Australian children. CMA membership includes ECA (Early Childhood Australia), ACSSO (Australian Council of State Schools Organisations), APPA (Australian Primary School Principals Association), AHISA (Association of Heads of Independent Schools Australia), AEU (Australian Education Union), Parenting Research Centre, Council of Mothers' Union in Australia, SAPPA (South Australian Primary Principals Association), and other state-based organisations and individuals.

CMA's core activities include the collection and review of research and information about the impact of media use on children's development, and advocacy for the needs and interests of

## CONTEXT FOR CMA'S SUBMISSION

The early years of childhood are marked by the greatest level of brain development at any period of the life cycle. This is driven by innate factors but its direction is fashioned by the information environment to which it is exposed. This developmental process is primarily steered by parental involvement through touch, voice, and exposure to the natural and social environments, and this may be seen as ideal. However, contemporary reality makes it clear that, increasingly, parents are using electronic media to entertain and distract children, and also to allow the parents time to disengage from the constant demands of the young. This is not to suggest a moral fault in the parents but simply reflects the reality of the society and culture in which they live (we are all somewhat dependent on such media).

The consensus of the research on early brain development is that exposure to significant amounts of electronic media has lasting effects on the way the infant brain learns to process information.

Any national strategy on the early years that ignores the growing rôle of electronic media in those years is disengaged from the reality of contemporary family life, ignores the corpus of research on the issue, and consequently will not be a comprehensive or effective approach to promoting optimal well-being for young children.

CMA has been disappointed to note the absence from both the Advisory Panel and the Summit of contributors who have special expertise and experience in children's rights and wellbeing as media users. Nor is the key government department for media regulation involved in the initiative. It would appear that those behind the process have failed thus far to recognise the major significance of media use in the lives of young Australian children and we very much hope that this can be remedied.

## CHILDREN'S SCREEN USE IN AUSTRALIA

A [recent ABS survey](#) (2023) shows that 90% of Australian children 5-15yrs engage in screen-based activities.

- 24% spent 20 hours or more per week undertaking screen-based activities, compared with 16% in 2017-18
- 40% spent 10 to 19 hours per week on screen-based activities.

While these findings do not specifically relate to the early years, it is reasonable to conclude that such significant use does not happen overnight when children turn five, and children also have substantial engagement with screens at a younger age. There is certainly ample anecdotal

evidence that this is the case. There is also evidence regarding 4-5yr olds in the [Longitudinal Study of Australian Children 2016](#), which found these children averaged more than two hours of screen time per week-day. This evidence is further reinforced by the 2017 Australian Child Health Poll's findings on [What's happening in Australian homes](#). Children were found to spend significant time using screens at home: infants and toddlers averaged 14 hours, the two- to five-year-olds 26 hours, and the six to 12-year age group averaged 32 hours per week. The 2017 poll also revealed that 50 per cent of toddlers and preschoolers were using a screen-based device without supervision.

Events since these data were collected, and in particular the COVID-19 pandemic, make it reasonable to assume that the figures would only have grown.

The use of screens by Australian children is of great concern to their parents, with the [Australian Child Health Poll \(2021\)](#) showing excessive screen use as their top health concern for children.

The poll of 1,980 parents of children aged one month to less than 18 years found:

- The number one health concern for parents in 2021 is excessive screen time with more than 90% of parents reporting it was a big problem or somewhat of a problem in the community.

Further, the top ten list included no fewer than 6 other issues related directly or indirectly to screen time and content:

## Top ten Child Health Problems

1. Excessive screen time
2. Bullying/cyberbullying
3. Internet safety
4. Unhealthy diet
5. Child abuse and neglect
6. Depression
7. Not enough exercise
8. Suicide
9. Overweight or obesity
10. Family and domestic violence

Australian Child Health Poll 2021

Items 2 and 3 relate directly to screen time; items 4 and 9 are linked to food marketing; item 6 can be associated with consumption of certain kinds of content; and item 7 can be linked with overuse of screens in at least some cases.

Once again, while it is true that these findings relate to a wider age range, it is worth considering how support for the setting of good habits in the early years could have salutary downstream effects on these matters.

## THE IMPACTS OF SCREEN USE AND CONTENT ON HEALTH AND WELLBEING OF YOUNG AUSTRALIAN CHILDREN

The Director of the Australian Child Health Poll, paediatrician Dr Anthea Rhodes, said [one of the most significant findings, that directly affected children's health](#), was the impact of screen use at bedtime on sleep.

“Almost half of children regularly use screen-based devices at bedtime, with one in four children reporting associated sleep problems. Teenagers using screens routinely at bedtime were also more likely to report experiencing online bullying. It's best to have no screen-time an hour before bed and keep screens out of the bedroom, to ensure a better quality of sleep,” she said.

She also found that “There is little evidence to support the idea that screen use benefits the development of infants and toddlers, but physical playtime and face-to-face contact is proven to be critical to a child's development. If you do offer screen time to your young child, it's better if you watch it with them, so you can talk together about what they are seeing and help children to learn from the experience.”

Research from many other countries highlights the importance of recognising and acting on the impacts of screens in early childhood, and of supporting parents in promoting the healthy use of screens with their children right from the early months. The Canadian Paediatric Society's 2021 summary of research on the impacts of screen use in early childhood could be used as a basis for policy and education. It concludes that:

*To promote child health and development in a digital world, health care providers and early years professionals should be aware of screen media's earliest impacts and [offer anticipatory guidance for families on appropriate screen time practices](#). Evidence is growing that early childhood can be a critical time to prioritize interventions that prevent problematic screen use. Encouraging caregiver involvement and interaction can help families use digital media in positive (educational, imaginative, and playful) and safer ways.*

## AUSTRALIAN CHILDREN'S RIGHTS AS SCREEN USERS

The [UN Convention on the Rights of the Child](#) has widespread acceptance throughout the international community, with more signatories than any other international agreement. Australia has obligations under the Convention in any case, but CMA submits that the strong acceptance of the norms it embraces should provide a further impetus for the Government to look closely at the provisions of the Convention and use them to shape the Early Years Strategy.

Before we address those provisions directly, we would also like to comment on the distinctive nature of a children's rights perspective and the difference it could and should make to a policy development process. CMA observes that much child-oriented media regulation currently in place, in Australia and around the world, is conceived more as a concession to children – a 'nice-to-do' – than as a matter of rights, or a 'must-do'. On this basis we have seen protections steadily eroded over the years – see, for example, the progressive winding-back of protections in the *Commercial Television Industry Code of Practice*, and the fairly recent abolition of the children's quota for commercial free-to-air television. We submit that the Early Years Strategy should see the protection of children's rights and interests as a must-do, which means placing young children's interests in all areas firmly front-and-centre in policy development, and not as an afterthought or something to be balanced against the interests of adults, or powerful corporations. This should be conceived as a matter of obligation, not charity.

Regarding media use, article 17 is most obviously salient:

*States Parties recognize the important function performed by the mass media and shall ensure that the child has access to information and material from a diversity of national and international sources, especially those aimed at the promotion of his or her social, spiritual and moral well-being and physical and mental health.*

*To this end, States Parties shall:*

- (a) Encourage the mass media to disseminate information and material of social and cultural benefit to the child and in accordance with the spirit of article 29;*
- (b) Encourage international co-operation in the production, exchange and dissemination of such information and material from a diversity of cultural, national and international sources;*
- (c) Encourage the production and dissemination of children's books;*
- (d) Encourage the mass media to have particular regard to the linguistic needs of the child who belongs to a minority group or who is indigenous;*
- (e) Encourage the development of appropriate guidelines for the protection of the child from information and material injurious to his or her well-being, bearing in mind the provisions of articles 13 and 18.*

CMA draws the Committee's attention particularly to the requirement to encourage the development of guidelines to protect children from injurious content (para (e)). There is ample evidence to suggest that 'injurious' in this context should be read to include violent and scary content, advertising for unhealthy products, and that which can be implicated in the grooming of children as future gamblers (for example games with loot boxes). It is also arguable that the term should be

seen as encompassing content that is designed to maximise engagement, and make disengagement difficult – that is, what is known as ‘persuasive design’.

Article 17 is known to have been the subject of a complicated negotiation process, where some states parties wanted stronger protection and some wanted weaker.<sup>1</sup> CMA suggests that if the Convention had been negotiated in the 2020s instead of the 1980s, article 17 would have looked significantly different, due to the massive growth in significance of mass media activities over the intervening years. (For example, the concept of ‘mass media’ would have given way to one that more clearly includes user-generated content, social media and online influencers.) In any case, the Committee on the Rights of the Child has recently gone some way towards filling the gap with its [General Comment 25 on Children’s Rights in Relation to the Digital Environment](#). CMA commends that document to the Committee, and urges you to look closely at all that it has to say, bearing in mind not just what children need during the early years but the habits that need to be established during that time to maximise the enjoyment of rights for older children and adolescents.

We draw the Committee’s attention, in particular, to:

- The discussion of the foundational principles of non-discrimination, best interests of the child, right to life, survival and development, and respect for the views of the child – all of which need to be borne steadily in mind in devising a strategy
- The need to have regard to up-to-date research from a range of disciplines in designing age-appropriate measures in keeping with the principle of evolving capacities
- The obligation to render appropriate assistance to parents and caregivers
- The variety of implementation measures (from legislation to access to justice and remedies)
- The discussion of the role of the business sector (especially significant given the way article 17 is phrased)
- The key role played by the right to privacy (which would not have had the same obvious link to media use in 1989 that it has today)
- The link to other rights such as health and welfare, education, and leisure and play
- The reference to regulating advertising for unhealthy products

In short, the message, not just from GC25 but from many who have a profound understanding of children’s rights, is that children have a right to access digital screen-based services, but to do so safely – that is, in ways which do not undermine their healthy development. The Early Years Strategy should include measures to make this a reality, including legislation and regulation, but

---

<sup>1</sup> John Tobin and Elizabeth Handsley, ‘Article 17. The Mass Media and Children: Diversity of Sources, Quality of Content, and Protection Against Harm’ in John Tobin and Philip Alston (eds), *Commentary on the Convention on the Rights of the Child* (Oxford University Press, 2019) ISBN 9780198262657.

also the allocation of resources to support parents and carers in establishing healthy screen habits from the very beginning of a child's life.

#### IMPLICATIONS FOR A NATIONAL EARLY YEARS STRATEGY

Such an influential area of children's lives must be taken into account in the development of any strategy which aims to improve young children's development, health and wellbeing. Recognition of this fact seems absent from what should be other relevant strategies such as:

- [\*The National Action Plan for the Health of Children and Young People\*](#);
- [\*The National Children's Mental Health and Wellbeing Strategy\*](#); and
- [\*Safe and supported: the national framework for protecting Australia's children\*](#).

CMA is pleased to see that Australia now has the opportunity, with the development of the Early Years Strategy, to correct these omissions. As a minimum starting point, the Strategy should address:

- the need for a research- and age-based classification system for screen content (especially that which is violent or scary);
- measures for enhancing children's online privacy;
- the design of digital experiences so that they are less likely to encourage over-use; and
- government regulation of advertising for unhealthy products.

In response to three questions in the Discussion Paper, CMA recommends the following.

**The Strategy's vision** must be sufficiently comprehensive that it can provide for young children's safety, wellbeing and rights as users of digital and screen media to be recognised and supported.

**The outcomes** must include (as short, medium, and long-term outcomes) that children are physically and emotionally healthy, facilitated by the effective protection and promotion, by all sections of the community, of infants' and young children's safety, wellbeing and rights as users of digital and screen media, and by effective support for parents and caregivers to provide guidance for children in healthy screen use.

Screen use would be an ideal **area for focus to improve coordination and collaboration in developing policies for children and families**. It cuts across demographics (socio-economic, cultural, disability) because nearly all children use screen media, and nearly all parents and carers face similar challenges as to the establishment and maintenance of healthy habits. In addition, it cuts across portfolios and agencies (health, education, children and families, Attorney-General's, communication). It is also

worth noting that the National Classification Scheme, for all its flaws, does provide a model for co-operative federalism that could be applied, or at least learnt from, in other kinds of coordination and collaboration. Finally, screen use naturally directs attention towards parenting (again, across all of society), and the Government's obligation to support parents and carers in fulfilling their responsibilities. Starting in this way from a real life experience that is practically universal would be a natural way to open up avenues for coordination and collaboration.

## CONCLUSION

We thank the Committee once again for the opportunity to comment on this important initiative, and we should be most pleased to expand on the points made here, if that would be helpful.

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted title]