



## Comment on the FaHCSIA discussion paper

### “Australia’s children: safe and well” June 2008

Young Media Australia welcomes the opportunity to make comment on this discussion paper.

This comment has been prepared for Young Media Australia by Associate Prof. Elizabeth Handsley (Vice President) and Barbara Biggins OAM (Hon CEO) on behalf of the Board of the Australian Council on Children and the Media (trading as Young Media Australia (YMA)). For further information, please contact Barbara Biggins at above address.

Elizabeth Handsley is a specialist in media law as it relates to children, and Barbara Biggins is CEO of YMA, and a former member of the Children’s Program Committee of the Australian Broadcasting Tribunal, and former Convenor of the federal Classification Review Board.

#### A. INTRODUCTION

1. Young Media Australia (YMA) is the trading name of the Australian Council on Children and the Media (ACCM). The ACCM is a not-for-profit national community organisation structured as a company limited by guarantee. The ACCM has a national Board of Directors representing the states and territories of Australia, and has a national membership of organisations and individuals who support the aims of the organisation, viz to stimulate and maintain public interest in the provision of suitable films and television programs for children.
2. The ACCM has a comprehensive organisational membership which includes ECA (Early Childhood Australia (formerly AECA Australian Early Childhood Association)), ACSSO (Australian Council of State Schools Organisations), AHISA (Association of Heads of Independent Schools of Australia), AEU (Australian Education Union), SAPPA (South Australian Primary Principals Association), Federation of NSW P&C (Parents & Citizens), and the Mothers’ Union in Australia. Our members have a special interest and/ or expertise in media issues and children.
3. Young Media Australia’s mission is to promote a quality media environment for Australian children and to raise community awareness of children’s needs in relation to the media.
4. YMA’s core activities include the collection of research and information about the impact of media on children’s development, and advocacy for the needs and interests of children in relation to the media.

5. Young Media Australia's core services include:

- a 24/7 freecall helpline 1800 700 357,
- a website [www.youngmedia.org.au](http://www.youngmedia.org.au) containing a wealth of media-related information (attracting over 1000 visits per day),
- a popular child-friendly movie review service (*Know before you go*),
- the development of parent media awareness materials, and
- making submissions, and participating in media interviews, related to media regulation.

## **B. THE BASIS FOR YMA's SUBMISSION**

Young Media Australia bases its comments on the following principles and knowledge base:

### **1. *The International Convention on the Rights of the Child Article 17*, viz**

"Parties recognise 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: ...

(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 Article 13 and 18."

Article 13, paraphrased, supports the rights of children to seek and receive information and ideas of all kinds, subject to restrictions to protect public health.

Article 18, paraphrased, supports parents in their primary responsibility for the upbringing and development of their children, but requires that institutions support parents in this role.

### **2. *Objectives b), h), i) and j) from the Broadcasting Services Act, s 3***

(b) to provide a regulatory environment that will facilitate the development of a broadcasting industry in Australia that is efficient, competitive and responsive to audience needs; and ...

(h) to encourage providers of broadcasting services to respect community standards in the provision of program material; and

(i) to encourage the provision of means for addressing complaints about broadcasting services; and

(j) to ensure that providers of broadcasting services place a high priority on the protection of children from exposure to program material which may be harmful to them ...

### **3. *The Policy Guidelines on Children's media developed by the Australian Council for Children and the Media.***

### **4. *YMA's ongoing collection and review of the research literature***

In the preparation of comment on this issue, YMA has selected a list of relevant articles. This is appended (Appendix 2).

### **5. *YMA's ongoing involvement in Standards and Codes as they impact on children***

In the preparation of this submission, YMA has relied on its experience and active involvement in the use and maintenance of children's TV standards, the Commercial Television Industry Code of Practice, the National Classification Code and the *Guidelines for the Classification for films and computer games*, and for *Publications*.

## **C. SUMMARY OF AREAS OF COMMENT**

Young Media Australia wishes to limit its comment to the section on the Key measure:

### **Stronger prevention focus**

And in particular on:

- Promotion of good parenting
- Support for families to protect children online, including
- issues related to the sexualisation of children in the media.

## **D.DETAILED COMMENT ON “Stronger prevention focus (preventing child abuse and neglect)**

Under the following heading, the paper says:

### **“OPTION FOR INCLUSION IN NATIONAL FRAMEWORK FOR PROTECTING CHILDREN:**

#### **D 1. Promotion of good parenting**

In conjunction with other support services, targeted evidence-based campaigns using a public health model could help promote good parenting and prevent families falling into patterns of behaviour which end up requiring tertiary interventions.”

#### **YMA comment:**

YMA holds the research-based view that children's experiences related to all media can have a considerable influence on their development. The “old” media, as well as the “new”, can have adverse influences, or positive (if well chosen) .

YMA holds the view that the Discussion paper should consider the provision of support for parents in relation to traditional forms of media via parenting courses and information, as well as in relation to the internet. The risks from some forms of “old” media may be more problematic, especially for young children, as they tend to spend much more time with TV and DVDs than other forms.

Potentially negative influences can include increases in the likelihood of using violence to solve aggression, age-inappropriate sexualisation of children, the promotion of the joys of a junk food diet, anxieties and fears aroused by scary or violent depictions,

poor sleep patterns and quality, attention difficulties and poorer academic performance. (Johnson, Jordan, Martin, Murray, Rideout, Tanimura)

The increasing marketing and advertising pressures on the young are increasing children's anxieties about themselves and adversely impact on their self esteem, as children feel inadequate without the latest in brands, and other consumer goods. This poor self esteem can leave these children open to exploitation by others . (Buizjen, Chakroff, John)

The rapid expansion in media forms and outlets over the past 15 years, has led to many new and additional pressures being placed on parents and caregiver to ensure that their children's use of media is healthy. Many busy parents find it difficult to sift the many media products (often inappropriately promoted to children) and find the positive age-appropriate ones. Many are unfamiliar with the newer technologies such as videogames, and have little of their own experience to guide them in encouraging constructive use. Some give up the struggle, others are indifferent, but as YMA has found many parents welcome easy access to information and strategies for positive guidance. YMA's website contains a wealth of research-based information to assist in this.

**YMA recommends that :** to reduce children's exposure to potentially exploitative and harmful media experiences, parenting courses and information should include media management guidelines to support parents in encouraging healthy use, of all forms of media, by their children.

## **D 2. Support for families to protect children online:**

### **The Discussion paper says:**

"Children can also be at risk through the Internet by exposure to inappropriate, offensive or illegal websites and content; or through chat rooms where they could develop inappropriate online relationships with other users. They can be at risk by giving away personal information online or by being harassed or bullied via email, chat rooms and instant messaging.

### **EXISTING GOVERNMENT MEASURE:**

**The *NetAlert — Protecting Australian Families Online* initiative is part of the Australian Government's ongoing commitment to providing a safe online environment for all families, especially children. It provides:**

- the National Filter Scheme to provide every Australian household and public library with access to a free internet content filter to help block unwanted content; and
- a new website and national helpline to provide advice about protecting children online.

The recently launched *Child Exploitation Tracking System* (CETS) is a software tool to help police better protect children from online abuse. It enables the Australian Federal Police to work with law enforcement agencies throughout Australia and the world, to share and

track information relating to online child exploitation and abuse. With this system, police can speed up the process of identifying and arresting offenders.”

### **YMA comment**

YMA believes that additional support needs to be provided to families, apart from filters, especially to those with young children under 7. Such support needs to be supplied in a community setting, where parents often go and have a community network, and provided by people whom parents trust.

Internet use begins from about the age of 3, and many families do not have the skills to know how to protect young children on the internet. (Vanderwater, Willoughby) Further, many young children may gain a false sense of security when they use the internet in a highly protected environment such as at school. Outside that protected environment, they may flounder when faced with adverse experiences.

YMA has developed a research project to design, produce and disseminate community based resources for parents of young children (Cybersafe@home) for use Australia-wide. YNMA seeks funding for this much needed project.

**YMA recommends:** that support be provided for community based networks where parents receive practical guidance in protecting young children online.

### **D 3. Issues related to the sexualisation of children in the media.**

**The discussion paper says:**

“The Australian Government supports the recent initiative of the Australian Association of National Advertisers (AANA), the peak body representing advertising and marketing communications to amend their Advertising to Children Code including the direct prohibition of the sexualisation of children or the use of sexual imagery in advertising/marketing communications to children.<sup>14</sup>

### **YMA comment**

YMA has long been involved in issues related to the increasing sexualisation of children in and by the media. We see this as a serious issue that has significant potential to impact adversely on children’s development, and personal safety.

YMA made representations to the AANA when it was developing this above amended Code. YMA is of the view that the Code amendment will do little to prevent the ongoing sexualisation of children, and we are dismayed to read that the Australian Government supports it.

Further it is evident that while some of the sexualizing depictions occur in advertising and marketing, others occur in children’s magazines, and in TV music video programs. The AANA Code, even if effective, has no effect here.

YMA, as well as professional organisations such as the Australian Psychological Society also made representations to the recently concluded Senate Committee on Environment, Communication and the Arts inquiry into the sexualisation of children in contemporary media.

This submission can be found at

[http://www.youngmedia.org.au/pdf/Submissions/yma\\_submission\\_sensxn\\_2008apr.pdf](http://www.youngmedia.org.au/pdf/Submissions/yma_submission_sensxn_2008apr.pdf)

YMA 's criticisms of the AANA Code are included in the several following extracts from this submission which explain YMA's position.

*Extract 1.*

"The sexualisation of children has two aspects. One is the sexualisation of children and adolescents themselves in the media, and the other is the exposure of children to sexualised images, irrespective of whether these include children or not.

YMA believes that:

- a) Children should not be directly portrayed in sexualised ways in the media as it is harmful to the development of the child portrayed and/ or to the child viewing the representation.
- b) Children should not be exposed to exploitative and superficial representations of teen and adult sexuality in the media at times and in environments where they have every right to be."

*Extract 2.*

"YMA notes here the useful definition of "sexualisation" used by the American Psychological Association in its 2007 study, viz "sexualisation occurs when a person's value comes only from her/his sexual appeal or behaviour, to the exclusion of other characteristics, and when a person is sexually objectified".

*Extract 3*

"YMA finds that children are sexualised *in* advertisements and articles in magazines directed at children. Such magazines include Total Girl, Bratz, KZone, Little Angel.

The content of many such magazines gives a strong message that being sexy (via cosmetics, age-inappropriate clothing, constant images of sexy role models etc) is important even if you're only six.

Children are also presented in a sexualised manner in clothing advertisements and catalogues.

YMA finds children are also sexualised *by* media images of adult sexuality which are inappropriately placed in spaces which children frequent – for example day time TV music video shows, outdoor billboards, the Internet."

*Extract 4.*

"The evidence on the short and long term impacts

Australian health and welfare professionals in Australia have been expressing their concerns about this issue.

### Landmark report in Australia

The Australia Institute's October 2006 report "Corporate Paedophilia" is a landmark report in terms of summarising the concerns and research about this issue. It is to be highly commended to the Inquiry.

### Overseas reports and research

The American Psychological Association issued a report summarising the issues and research in 2007. The press release for this report and the composition of the Task Force for the APA can be found at Appendix 1."

#### *Extract 5.*

"Strategies for prevention/ harm minimisation

#### Regulatory approaches

YMA wishes to emphasise that we see the representation of children *in* the media as more important, and more in need of attention at the present time, than the issues around exposure of children to impactful portrayals of adult sexuality.

This is not because the latter is not important, but there are laws already in place which should restrict the dissemination of sexual content in places where children will be exposed to it. Although these laws are clearly in need of tightening-up, ... there are no laws that directly confront the dissemination of material that encourages children to see sexiness as a measure of their success, nor as important for their self concept."

#### *Extract 6*

*"The new AANA Code for Advertising and Marketing Communications to Children*

Recently the advertising industry moved to address the issue of sexualisation of children, with amendments to its *Code for Advertising and Marketing Communications to Children*. Young Media Australia made a detailed submission to the AANA review, and few if any of our recommendations were adopted.

As to the sexualisation issue, we made recommendations very similar to those we are making to this Inquiry, namely to prevent the direct portrayal of children in sexualised ways, and the careless exposure of children to representations of teen and adult sexuality. We also urged the same range of measures for developing strategies, education, training and so on.

The *Code for Advertising and Marketing Communications to Children's* new provision on sexualisation reads as follows:

#### **2.4 Sexualisation**

Advertising or Marketing Communications to Children:

- (a) must not include sexual imagery in contravention of Prevailing Community Standards;
- (b) must not state or imply that Children are sexual beings and that ownership or enjoyment of a Product will enhance their sexuality.

The provision applies only to a narrow range of advertising and marketing communications, defined as those that, 'having regard to the theme, visuals and language used, are directed

primarily to Children and are for ... goods, services and/or facilities which are targeted toward and have principal appeal to Children.’ (Clause 1 – emphasis added)

YMA believes that while the term “sexual imagery” may be somewhat useful as a tool to discuss the issues, it is too vague to be used as a regulatory term. The APA definition may be more appropriate. (see p 3 above)

YMA is not aware of communications in the past that have been directed primarily to children, and for products of principal appeal to children, that have included sexual imagery; rather the problem is with communications aimed at adults but to which children are frequently exposed.

As to paragraph (b) YMA believes that it does not adequately capture the issue. In order to breach paragraph (b) a communication must state or imply that children are sexual beings, but ... this is not in and of itself an instance of harmful sexualisation. Rather the issue is that children are portrayed in sexualised ways, or ways that replicate adult ideas of what is sexy. To adapt the APA definition of sexualisation, paragraph (b) should apply when a communication states or implies that a child’s ‘value comes only from her/his sexual appeal or behaviour, to the exclusion of other characteristics’. Paragraph (b) does not pick up this point but provides that statements/implications that children are sexual beings breach the Code only if they also state or imply that the ‘Product’ will enhance their sexuality. (‘Product’ for this purpose means ‘goods, services and/or facilities which are targeted toward and have principal appeal to Children.’) YMA is not aware of any such statements or implications in the media. Community concern, once again, is about the way that sex is used to sell to children, in the sense that the media propagate an idea of how to look, dress and act that is infected with adult notions of sexual attractiveness.

Therefore we conclude that in spite of the new provision in the *Code for Advertising and Marketing Communications to Children*, there is still some way to go in effectively addressing these issues. In particular, we think that the above demonstrates the need for great care to be taken in defining and describing the issue so that all concerned know exactly what we are talking about. It is not about whether children see a nipple on a billboard, and it is not about statements that children are sexual beings. It is about the exposure of children to exploitative and superficial representations of sex and sexuality, and it is about the use of sex to sell to children. YMA would welcome the opportunity to work further with the Committee on these matters which we see as being of key importance.”

#### Extract 7

##### *“The need for collaboration and careful research*

The development of effective Codes to provide a proper level of protection for children is best done via a collaboration of media, children’s professionals, community reps and regulators so that the issues are carefully defined.

Next steps could include:

- \* Establish sensible guidelines for use across different industries which acknowledges various practices and which are written in plain English;
- \* Implement these, firstly on a trial basis, to eliminate oversights and errors (taking into consideration mixed environments and timeslots, children’s and adults’ only environments and entertainment as well);
- \* Fund education and retraining around sexualised imagery for key corporate, media and other key personnel
- \* Once perfected, standardise codes and enforce them.

## Parent supports

Parents are increasingly asked to bear most of the responsibility for keeping their children from harm from media impacts, with effective regulatory supports lagging behind developments in media. This issue of care is one which parents find very difficult to counteract, with marketing communications striking at the core of their children's self esteem.

Organisations such as Young Media Australia offer parent media awareness resources and support via its website and national freecall Helpline, but these services have very little ongoing funding. So much more could be done to help parents to avoid potentially harmful impacts if government funding were available and sustained.

## The Australia Institute recommendations Dec 2006

The second report from the Australia Institute "Letting children be children" contains a wealth of useful recommendations and are to be commended to the Inquiry.

One of particular note is that of the establishment of a unit with the power to evaluate and make recommendations in relation to all media that impact on children, and to have within it persons with child development, health and welfare expertise. The present fragmented regulatory system for different aspects of media does not serve the interests of children well."

**YMA recommends:** that Australia's child protection framework should include an undertaking to fully review the issues of harm from the ongoing sexualisation of children in the media, and should seek to find some solutions that will provide effective protection of children in this regard.

**END**

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