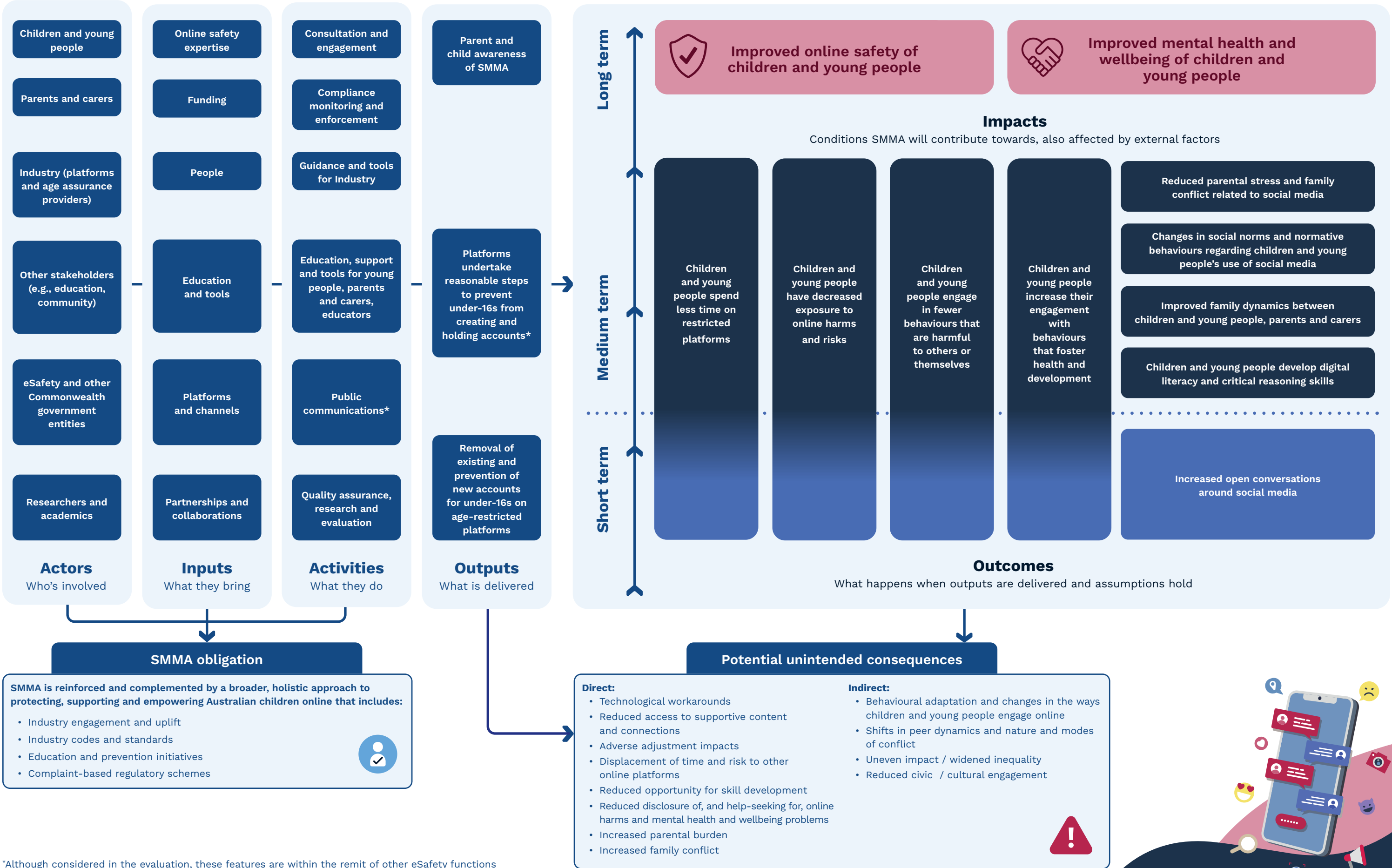


eSafety Theory of Change for the Social Media Minimum Age obligation



Policy assumptions

Assumptions that must hold to activate the change pathway

- Age-restricted platforms are those associated with greatest risk of harm
- Consistent and effective implementation of age assurance
- Legislation settings and industry compliance are sufficient to drive behaviour change at a population level
- Accessibility and uptake of alternative online and offline spaces for connection, community and social–emotional learning
- Opportunities and support exist for building digital literacy
- Attitudes among parents and carers, children and young people shift to support adherence to SMMA
- Children and young people’s online safety continues to be viewed as a collective responsibility
- Reduced access to age-restricted social media redirects children and young people’s time and attention towards digital practices and offline activities that support their wellbeing and development
- Parental capacity and resources actively support digital parenting and offline alternatives
- Accessibility of, and engagement with, information and support resources
- Unintended consequences don’t lead to adverse impacts on the safety and/or mental health and wellbeing of children and young people

External factors

Factors within the context of implementation that affect the degree to which outcomes can be realised

- Political, legal and regulatory environment
- Technological change and digital infrastructure
- Platform behaviour and market power
- Social, economic and environmental context
- Public attitudes, media and discourse
- Evolving evidence base on wellbeing and mental health of children and young people
- Cross-system policy interactions
- Changing geopolitical environment

Theory of Change narrative

*A Theory of Change sets out how and why a policy is expected to lead to **impacts**. It identifies key activities, outputs, and assumptions, which may contribute to intended and potential unintended outcomes, and external factors influencing implementation. In this way, it can be seen as a ‘change pathway’.*

The Online Safety Amendment (Social Media Minimum Age) Act 2024 (Cth) policy is designed to safeguard young Australians during a formative stage of development by strengthening protections against exposure to potentially harmful design features, content, and experiences on social media platforms.

The SMMA Theory of Change illustrates the change pathway through which the policy is expected to achieve its intended impacts. It identifies the **actors** involved in implementation, the **inputs** they contribute, and the **activities** undertaken to support the SMMA legislative intervention. These activities, supported by broader efforts to prevent harm, protect individuals, and drive systemic change, are expected to deliver a series of **outputs**. In turn, these outputs are expected to influence young people’s access to, engagement with, and experiences of age-restricted social media platforms, leading to a sequence of short, medium and long-term **outcomes**. Collectively, these outcomes are expected to contribute to the intended **impacts** of the policy: improved online safety, mental health and wellbeing for children and young people in Australia. The SMMA Theory of Change is intended to be a **dynamic theory** that will be iterated as the policy landscape evolves, and as new insights emerge¹.

The Theory of Change recognises that the relationship between social media use and children and young people’s mental health and wellbeing is complex and bidirectional – social media can affect mental health and wellbeing, and mental health and wellbeing can also shape how young people use and experience social media². While experiences of the legislation and associated outcomes are expected to vary for individual young people and families, the Theory of Change suggests that if outputs are delivered and assumptions hold true, the legislation will prompt changes at the system, community, and individual level that, collectively, are sufficient to improve online safety and mental health and wellbeing outcomes across the broader population of young people.

The outputs of the SMMA are expected to contribute to a series of interconnected short-, medium- and long-term outcomes. Without the delivery of these outputs, the intended outcomes and impacts are unlikely to be realised. The pathway from outputs to impacts are described below.

- Awareness of the SMMA, together with effective age assurance, account prevention and account removal measures, is expected to reduce the number of children under 16 who hold accounts on age-restricted social media platforms. As a result, children and young people are expected to **spend less time on these platforms** and experience **reduced exposure to online risks and harms** derived from harmful content, interactions, and platform design features and functions.
- **Reduced exposure to online risks and harms** may occur through several pathways. Children and young people may have less exposure to **content-related harms**, including content promoting or normalising self-harm, suicide or disordered eating; fewer **control-related harms** associated with problematic or excessive use that displaces protective activities such as sleep, physical activity, education, recreation and in-person social connection; and fewer **harmful online experiences** such as bullying, harassment, stalking, exploitation, unwanted contact and solicitation.
- Reduced exposure to these harms is expected to contribute to **fewer behaviours that are harmful to children, young people, themselves or others**, including dangerous online challenges, self-harm behaviours, cyberbullying, harassment, and other risk-taking behaviours. At the same time, young people may be more likely to **engage in behaviours that foster health and development**, including healthy sleep patterns, physical activity, participation in education and hobbies, spending time outdoors, and in-person social connection.
- The pathway also recognises the important role that parents and carers play in supporting intended outcomes. In the short term, the SMMA is expected to encourage **more open conversations between children and parents or carers** about online experiences, digital literacy, safety, and wellbeing. These conversations are expected to act as a protective factor by helping children and young people to develop **digital literacy and critical reasoning skills** in the medium to long-term, which help them to navigate online risks, build resilience, and engage more safely with digital technologies as they mature.
- In the medium to long term, as **delayed account ownership on age-restricted social media becomes more normative**, parents and carers may experience **less stress and family conflict** related to children’s social media use, which in turn may lead to changes in family **dynamics** – for example, by strengthening parent-child relationships.

These outcomes are mutually reinforcing. Delaying account ownership on age-restricted social media, is expected to decrease opportunities for exposure to harmful content, interactions and platform features, while increased engagement in protective behaviours and supportive family relationships is expected to further strengthen wellbeing. Over time, the cumulative effect of these changes is expected to **strengthen the online safety of children and young people** and contribute to broader **improvements in their mental health and wellbeing**.

However, the achievement of the intended outcomes depends not only on the delivery of outputs, but also on a set of policy **assumptions** holding true. In the Theory of Change, **assumptions are the conditions that need to hold for the change pathway to be activated**. These assumptions are central to whether the legislative intent of SMMA can translate into real-world impact.

¹ Rogers, P. (2024). Developing, representing, and using theories of change for interventions in complex systems. In Theories of Change in Reality (pp. 94–102). Routledge.
² National Academies of Sciences, Engineering, and Medicine. 2024. Social media and adolescent health. Washington, DC: The National Academies Press. <https://doi.org/10.17226/27396>

Theory of Change narrative continued

Additionally, given the complexity of the system in which the policy operates, the Theory of Change acknowledges the **potential for positive and negative unintended consequences**. These unintended consequences have been identified for monitoring purposes, recognising that the effects of a new policy cannot be fully predicted in advance and that new consequences may emerge over time. These are not expected or inevitable outcomes, but plausible risks and opportunities that warrant ongoing monitoring. The most critical assumptions and associated unintended consequences are outlined below:

- **Age restricted platforms will comply with the SMMA obligation, which requires platforms to implement effective age assurance.** The achievement of early and intermediate outcomes depends directly on this assumption holding true. As articulated in the unintended consequences, if compliance is weak, inconsistent, or age assurance processes are easily bypassed, children may continue to hold accounts on restricted platforms, undermining the policy's intended effects. Without it, the causal link between outputs and outcomes breaks down, and longer-term impacts are unlikely to be realised at scale.
- **Alternatives to age restricted platforms are accessible and utilised.** The Theory of Change anticipates that limiting account ownership will encourage children to engage in healthier offline and online environments. If such alternatives are not accessible or utilised, children may experience social isolation, seek to bypass the age restrictions, seek out less regulated platforms, potentially exposing them to different or greater risks.
- **Parents have the capacity and resources to support children through the transition as they lose their access to social media accounts.** Their ability to guide and support their child's digital engagement and literacy in age-appropriate ways and support their engagement with alternative online and offline activities, is an important enabling condition for the intended outcomes. Without this support, changes in access to restricted accounts may not translate into intended changes in behaviour and, in turn, increased safety and wellbeing.
- **Attitudes and social norms related to social media use and digital parenting will shift to support adherence in response to the policy.** The Theory of Change anticipates that children's and parents' attitudes and behaviours will increasingly shift to support delayed access, and that broader cultural expectations around social media use will evolve accordingly. If this normative change doesn't occur, there may be resistance, increased attempts to bypass restrictions, or migration to alternative platforms, which could undermine the effectiveness of the policy.
- **Age restrictions will not inadvertently lead to unintended consequences that have adverse impacts for the safety and/or mental health and wellbeing of children and young people** – for example, worsening mental health outcomes by increasing feelings of exclusion or limiting access to supportive online communities. These risks are explicitly acknowledged as potential unintended consequences, reinforcing the importance of the assumptions being continuously tested, and unintended consequences monitored, throughout the evaluation process.

Finally, the likelihood and timing of outcomes being achieved will be influenced by a range of **external factors** – for example the rapidly changing technological landscape, and legislative changes in other jurisdictions. While these factors sit outside eSafety's direct control as regulator of the SMMA obligation, they may influence implementation, effectiveness and the timeframe within which outcomes can be realised.

