**Prof. Philip D. Jaffé**

Member

UN Committee on the Rights of the Child
Center for Children's Rights Studies

Comment for draft No. 25 (202x)- Children’s rights in relation to the digital environment

We are grateful for the opportunity to review and respond to the General Comment on children’s rights in relation to the digital environment and share insights from our area of expertise, particularly our years of field work and the recent experiences during the COVID-19 pandemic.

[Kibbutzim College](https://en.smkb.ac.il/about-us/), established in 1939, is the largest education and teacher training institution in Israel and from its earliest days championed social-humanistic approaches in education.

Kibbutzim College relies on deeply rooted social and ethical principles that lie at the backbone of all its activities: integrity, democracy, responsibility, Israeli culture, quality, and knowledge. All coalesce into one supreme principle—**humanism**, meaning the focus on human value, dignity, liberty, and development. The College mission is to train educators and therapists with a humanistic approach and imbued with social and environmental responsibility, working to promote academic knowledge, laying the foundations for a democratic citizenry, and incorporating the arts in education. These values are evident in the institution’s multidisciplinary curricula.

**Kibbutzim College has four faculties: Education, Sciences, Humanities and Social Sciences, and Arts. All four offer B.Ed. and M.Ed. programs, as well as MTeach tracks for principal training. Aside from the faculties, the College also includes various schools providing diploma programs for teachers, research and study centers, the Center for Empathy in Education, a simulation unit, the Contemplative Pedagogy Center, and much more.**

This document was prepared by a team comprised of researchers and lecturers of the master’s degree track in the Education Faculty’s Department of Technology in Education; it includes general recommendations and specific proposals we believe are appropriate for incorporating in the treaty. We hope you find this useful and a way to enhance the final document.

Cordially yours,

Dr. Irit Levy-Feldman

[Dean of Education Faculty, Kibbutzim College](https://en.smkb.ac.il/academic-programs/faculty-of-education/)

Team researchers:

**Dr. Betty Shrieber**—Program Director of M.Ed. program in Educational Technology, researcher, and lecturer at the Kibbutzim College of Education. Her current research area is in the field of assistive technologies for students with specific learning disabilities (SLD).

**Dr. Miri Shonfeld**—Head of the Technology, Education, and Cultural Diversity (TEC) Center at Mofet Institute and a faculty member of the graduate program in Technology in Education at Kibbutzim College of Education, Tel-Aviv. She is the 2010 recipient for commendation on an outstanding educational project for tolerance, was awarded the 2013 Education Ministry commendation for unique pedagogical initiative, and in 2018 received the Unity Award for the TEC Center from the president of Israel. Her research deals in online learning environments, collaborative work, intercultural links, and faculty development.

**Dr. Sigal Ozery Roitberg**—Anthropologist and sociologist, lecturer, and researcher at Kibbutzim College. Her areas of research include: qualitative research, political culture, multiculturalism, racism, generational changes, social protests, and the links between culture, politics, and education.

**Dr. Tami Seifert** —Senior lecturer in the Kibbutzim College of Education, specializing in innovative technologies in education, mobile learning, online instruction, social networking in educational contexts, application of video in teaching and movement literacy. At present, she also instructs teacher educators specializing in learning design in the information age at the MOFET Institute.

**Dr. Orit Zeichner**—Teacher educator, teaching pre-service teachers and university faculty how to improve the quality of teaching through effective integration of technology-based learning environments. Dr. Zeichner specializes in educational technologyandis engaged in the development of educational programs for the intelligent use of the internet.

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General Comment (**Dr. Sigal Ozery Roitberg)**

The Convention on the Rights of the Child was inspired by the writing of Janusz Korczak, who focused on the inner processes unfolding within the child and the social injustice inflicted on children. The contemplative viewpoint, along with the deliberation into emotions and a profound review of the social values associated with social relations, are important educational and humane foundations that lie at the core of this document. This point must be emphasized. Contrastingly, in that document the legal language in use (“adult” language), that of Korczak himself, is clearly dominant. It establishes a macro viewpoint and his own experiences—one we believe distances us from the source text. Therefore, despite an attempt to raise questions from the child’s perspective and give children a voice in worlds of digital content, the general impression is that this does not adequately represent mental (conscious or subconscious) processes of children when exposed to the digital domain. How does this exposure impact the child’s well being? How does it influence the child’s relations with parents, friends, and teachers? What social values and (implicit and explicit) messages are conveyed to children exposed to this environment? How is the child identity formed and consolidated in this environment and how do they influence it? We suggest that these holistic, emotional, and value-driven aspects be further underlined in the final treaty draft.

General Comment (**Dr. Betty Shrieber)**

The positive and negative influences of new technologies developed in recent years should be specifically investigated as they increasingly enter areas of learning and leisure: virtual reality (VR), virtual worlds, robots, and artificial intelligence (AI). This is particularly important in view of the influence of these technologies on children brains and behavior.

For example, what would be the maximal allowable time to use virtual reality goggles or inhabit a virtual world before the brain is harmed? What effect do these technologies have on distinguishing between fiction and reality, or cope with the humanization of robots and bots (including dialoguing with AI bots or establishing emotional associations with AI).

**Proposed additional “Remote Learning” article (Dr. Miri Shonfeld)**

We oppose paying particular attention to remote learning by adding this issue as a separate article.

Rationale: Following the COVID pandemic, many around the world began remote teaching and learning for long periods with structured curricula determined by each country’s education system. This article would also apply to learning during times of emergency.

Various reports indicate that a significant number of students do not register to participate in the system or do not benefit from it. Also, it appears that even students who do register do not necessarily learn during classes, but attend only partially. Moreover, it seems now that even with a return to on-site schooling, many systems will elect to incorporate remote learning programs in their curricula and therefore a clear and comprehensive address of all aspects of remote learning is required.

Online learning enables expanding the scope of learning beyond the traditional classroom, timetable, and duration during times of emergency. However, all children must have access to online learning in the following aspects: internet connection, computer for study, and the technological and pedagogical support essential for this type of activity. Where there are shortages of such resources, alternative teaching and learning options must be provided that are identical in scope to that provided to online students. Also, the means to assess and monitor students is necessary, as is the provision of support for students not incorporated into the online learning system. The factors impacting the incorporation of students to online education systems must be investigated and researched to strengthen this process among disadvantaged populations.

Concurrent to training, teaching staff on remote learning competencies and related ethical issues, children must be prepared for online learning by being introduced to technological tools, digital pedagogy, the self-discipline required for such learning, and collaborative digital learning. Also, classes must be designed and adapted to online teaching and learning in accordance with pupils’ skills and emotional aspects must be addressed (including, among others, length of screen time, seeing one’s own reflection throughout classes, loneliness, etc.).

We must ensure that in online classes where participants are seen and heard, no harm is inflicted on students due to exposure of their place of residence or families or revealing their abilities or difficulties to other adults.

**The following presents comments and feedback to the document articles:**

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| **This column addresses the proposed changes and includes comments, and were added to the original text as “comments”** | **This column provides general rationale for the proposed changes and a clarification for the comments** |
| Article 17, line 2 / Correction:Replacing "social environment" with: “…when brain plasticity is maximal, as is cognitive, emotional and social development, particularly the…”Article 17, line 13 Adding to Digital.. , virtual and AI technologies Article 17 last lineReferring to "…early childhood" Adding : Specifically, their impact on child brain development and the clear distinction between reality and fiction, a contrast that requires mediation with such technologies, requires further address. | A period should added after the sentence as it should stand independently and thus emphasized—early childhood brain development is vital to various functions: cognitive, emotional, and social. |
| Article A(114) (pg. 18)Recommend adding a paragraph to Article 114 designed to underline the importance of sexual education on the internet. “It is vital to develop and expand programs on digital sexual education that are positive and beneficial to children and parents.”\*addition of term “digital sexual education” | Article A(114) (pg. 18)Addresses the increasing importance of children understanding the digital environment, including its infrastructure, business methods, persuasion strategies, use of automatic processing and tracking of personal information. Teachers of digital literacy, including **sexual health** **education**, must be trained in DL skills and safety in digital environments.  |
| In the introductory paragraph of Article 1 – questions are raised – I would add a footnote for further review.  | Are these truly the central questions children ask on this subject? Or are they questions of parents concerned with how their children use to digital space? We recommend expanding on the child’s perspective on the matter… |
| Regarding D: Right to be heard (Article 12) number 18 –Regarding “…and provide access to child-friendly platforms, in order to let them express their views…”“States should offer training and support to children, creating platforms offering reliable, pluralistic, and adapted informative content (a children’s news format) that establishes firm ground for consolidating civic awareness. Furthermore, States should provide access to child-friendly platforms….” | It may be necessary, prior to providing children platforms for self-expression, that they be given the space to formulate opinions, and therefore this point should be added to the “right to be heard” article  |
| Regarding E: Collecting data and research (Article 31)Addition 1: Add: “Particular significance should be given to assessment research examining the long-term effects of digital environments on children’s mental wellbeing, their social and emotional competencies, and their tendency to screen addiction.” | Regarding assessment of the digital environment, it is important to emphasize the particular significance of studies examining mental wellbeing and social competencies (SEL – social emotional learning). “States must ensure the generation of reliable and dynamic information…” |
| Add: “States should ensure the production of robust, comprehensive data that is adequately resourced and adheres to the rules of ethics.” | E 31 (pg. 6) |
| I have added a comment in articles 40 and 43. |  J. Commercial advertising and marketing (pg. 7-8) |
| Additional comment in Article 59.   |  B. Freedom of expression (Article 13) (pg. 10) |