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**Paradigm Initiative Comments on Draft General Comment No. 25 (202x)**

***Children’s rights in relation to the digital environment***

**12 November, 2020**

**Introduction**

Paradigm Initiative is a social enterprise that builds an ICT-enabled support system and advocates digital rights in order to improve livelihoods for underserved youth. The PIN vision is for improved livelihoods for underserved youth aged 12 to 28. PIN advocates for the recognition and respect of digital rights and inclusion to ensure that the environment is enabling for the enjoyment of these fundamental rights. When the digital environment is free and inclusive, livelihoods are improved.

PIN welcomes the Draft General Comment No.25 (202x) which seeks to provide guidance on legislative, policy and other appropriate measures to ensure full compliance with the obligations under the Convention and its Optional Protocols in the light of the opportunities, risks, and challenges for children’s rights in the digital environment. This objective aligns with the PIN vision. It is with this avid interest that PIN makes comments in the section below.

**Comments**

In **Part 1 (4**), there is need for this particular clause to explain further on the likely opportunities and risks of harm which increase even when children do not actively access the internet. The clause may include that children are placed at risk by others even when they do not specifically engage in activities online. There is a growing need for ensuring the risk that children face is mitigated through promotion of a safe environment for children online.

In **Part III (A) (10)** it is critical to clearly provide that relevant policy and legislation must give effect to promoting access to the internet and digital technologies for all children without frontiers. States must include within National Action Plans, a roadmap to bridging any digital divide that is existent to ensure children in rural and remote areas access equal digital opportunities.

Under **Part V (K)** on remedies, it is important to include that children with disabilities also face specific challenges in obtaining access to digital technologies and effective remedies. States should provide adequate resources for providing such access and training for relevant institutions and caregivers on the use of digital technologies for children with disabilities.

In **Part V (G) (33)** on dissemination of information, awareness-raising and training, it is crucial to add that States should also disseminate information and conduct awareness raising campaigns on the platforms available for receiving any complaints on violations of children’s digital rights. The remedies must be clearly articulated. States must ensure that within schools and

Under **Part VI (F)(80)**, it is important to include that States must invest in digital technologies and digital infrastructure to ensure that birth registration processes are accessible within rural areas and remote areas to guard against statelessness of children. All health institutions and facilities in rural and remote settings where children are born must be capacitated with online registration units that allow for efficient and speedy registration of births.

In **Part XII (B**), States should consider restorative justice aimed at rehabilitation of children in conflict with cybercrime laws. Where applicable, pre-trial diversion processes must be available to child offenders with supervision and rehabilitative training on the responsible use of digital technologies.

**Conclusion**

Paradigm Initiative hopes that these comments will be considered in revising the draft general comment on children’s rights in relation to the digital environment. If there are any questions, Paradigm Initiative is reachable via an email submitted to Thobekile Matimbe, Paradigm Initiative’s Community Manager on [thobekile.matimbe@paradigmhq.org](mailto:thobekile.matimbe@paradigmhq.org).