**RESPONSE OF UNICEF NATIONAL COMMITTEE DENMARK**

**TO THE CALL BY THE COMMITTEE ON THE RIGHTS OF THE CHILD FOR**

**CONTRIBUTIONS IN ADVANCE OF THE DRAFTING OF A GENERAL COMMENT ON**

**CHILDREN’S RIGHTS IN RELATION TO THE DIGITAL ENVIRONMENT**

Denmark thanks the Committee on the Rights of the Child for the opportunity to provide evidence ahead of the drafting of a General Comment on children’s rights in relation to the digital environment. Below the comments, we believe to be particularly relevant to the proposed General Comment.

It is important to state that the differentiation between the analogue/real environment/IRL and the digital environment does not persist for the young generations today; the realisation of children’s rights in the digital environment is constitutive to the realisation of children’s rights in their everyday life. Moreover, the realisation of children’s rights in the digital environment could have the effect of a catalyser for children’s rights regardless of the place and social environment they live in.

* **I - Introduction. 3.:**

…. Meaningful access to digital technologies can support children to realise the full range of their gender civil, political, cultural, economic, social, cultural and environmental political and social rights.

* **II – General principles, B The best interest of the child (art. 3, para.1)**   
  Although the digital environment was not originally designed for children, they occupy the digital space along with adults. Therefore, this principle has a special importance in relation to the digital environment….   
  It is imperative to state that today the Internet and especially the social media where kids and young people spend most of their time online indeed are designed for kids. Even though all social media have an age barrier at 13 years of age, the fact is that kids from a far earlier age (starting at the early ages of school/ 7-8 years old) interact on social media such as TikTok, Instagram and are providers of their own YouTube Channels. These platforms provides a design for kids to use, not adults explicit.
* **V. – General measures of implementation by States (art. 4), 23**  
  In the development of policies and practices that affect children’s rights regarding the digital environment, States should consult with children, their parents and caregivers. Also stakeholders from the providers of social media platforms such as Facebook e.g., influencers and their agencies etc.
* **V. – General measures of implementation by States, G**  
  In addition to this, the advanced digital media usage, which is integrated into the learning at schools at all levels (Primary and Secondary), requires significant changes in the education model and the way teachers are trained to pursue their profession. Capabilities such as the 21th Century Digital Skills and The Convention of the Right of the Child should be stated in the curriculum.   
    
  Also it should be noted that the age at which children start using the Internet and electronic devices often handed out at school becomes lower and lower. It is therefore necessary to provide the educational support also to business clients, especially Internet providers and those who produce electronic devices, in order to sensitize them to the activity of youngsters in the Web.   
    
  Also in order to empower children to use the full potential of the digital network, it is essential to include parents in the process of the media literacy education. New ICT tools give parenthood a entirely new dimension. Some parents admit that they lack support in fulfilling their role as those who raise children and guarantee their rights. It seems therefore crucial to include parents into the school life of their children, also in the aspect of development of their digital competences.
* **I. – The business sector, 39**  
  States should also require businesses to maintain high standards of transparency and accountability, and encourage them to take measures to innovate in the best interests of children by consulting the children when doing so, as the children have a right to be heard in matters regarding their lives. More over the children are also users and therefore affected by the frameworks codes and terms of services and as a target group not differing between online and offline their view of things might be different to those of the adults.
* **B. – Freedom of expression (art. 13) 59**  
  A child’s right to freedom of expression includes freedom to seek, receive and impart information and ideas of all kinds, using any media of their choice e.g. by using their right to peaceful assembly as this is often what children and young people does when interacting on social medias.
* **E. – Right to privacy (art. 16)**  
  In addition to this it is also important to focus on the Internet as a platform *intended for* privacy. Where kids and young people can meet, join, share, explore etc. together with like-minded non-adults in order to grow and develop both in life and in their digital skills in the best interest of the child.   
  Children look upon social media platforms as “playgrounds” where they can challenge each other, share content, become smarter, gather information etc.. Also knowing the darker sides of the platforms such as grooming and other privacy violating matters and actions exists but those are (fortunately) not common encounters. In addition, playing also needs to be without adults overlooking the activity (privacy).