**Comments on the Concept Note for a General Comment on**

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

 **Submission by: Global Kids Online**

[Global Kids Online](http://globalkidsonline.net/) (GKO) is committed to generating cross-nationally comparable and robust evidence that reflects children’s voices, experiences and concerns directly. It is a collaboration between the [London School of Economics and Political Science (LSE)](http://www.lse.ac.uk/media-and-communications/research/research-projects/childrens-online-privacy-and-commercial-use-of-data),  [UNICEF’s Office of Research – Innocenti](https://www.unicef-irc.org/publications/795-one-in-three-internet-governance-and-childrens-rights.html), and the [EU Kids Online network](http://www.eukidsonline.net).  Global Kids Online works with UNICEF country offices and/or academic partners in [Albania](http://globalkidsonline.net/albania/), [Argentina](http://www.globalkidsonline.net/argentina?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Brazil](http://blogs.lse.ac.uk/gko/the-latest-findings-from-kids-online-brazil-on-children-and-the-internet/?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Bulgaria](http://blogs.lse.ac.uk/gko/are-children-empowered-to-benefit-from-the-internet/?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Canada,](http://globalkidsonline.net/canada/) China, [Chile](http://www.globalkidsonline.net/chile?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), Costa Rica, [Ghana](http://globalkidsonline.net/ghana/), India, [Montenegro](http://www.globalkidsonline.net/montenegro?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [New Zealand](http://globalkidsonline.net/new-zealand/), Peru, the [Philippines](http://www.globalkidsonline.net/philippines?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Serbia](http://www.globalkidsonline.net/Serbia?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [South Africa](http://www.globalkidsonline.net/south-africa?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), and [Uruguay.](http://globalkidsonline.net/uruguay/) Launched in 2015, Global Kids Online has surveyed over 30,000 children and 12,000 of their caregivers primarily in low-middle income countries– making it one of the most comprehensive evidence-generation project on children’s internet use globally.

For the consultation we draw on the findings from a forthcoming report (late 2019), including **survey data from 14,733 children aged 9-17 who use the internet** and one of their parents. The surveys were carried out between 2016-2018 in 11 countries across the globe, primarily in low-middle income settings.

With access to the internet growing worldwide, the environment in which children are growing up is fundamentally changing. While their basic needs may be the same as before, they are exposed to new and unique opportunities and risks specific to the digital age related to content, contact and conduct with other people on the internet that have the potential to both realise and infringe children’s rights. It is more important than ever to clarify how the internet can advance children’s opportunities in life while safeguarding them from harm or abuse. This requires evidence from children themselves, representing the diversity of their experiences at national and global levels, including children from low-middle income countries whose voices and experiences are rarely reflected in research, policy and debates.

Resolving the challenges arising from children’s use of digital technologies requires international cooperation and internet governance. We would, therefore, like to see the General Comment reflect the following:

**Access to information and freedom of expression and thought**

* Using the internet from home is the most common way to go online but many less affluent households struggle to afford internet access, especially in lower-income countries. The age differences for internet use at school are greater than for home use, suggesting that for younger children especially, the home is a particularly important place of internet access.
* In all countries, the mobile phone is by far the most used device for going online. Countries vary in whether the desktop or laptop computer come second, with children from less affluent backgrounds in the Global South relying more often only on mobile access. This matters insofar as personal devices enable more private use with less supervision, and devices without a keyboard may impede children’s opportunities to engage in some forms of creativity, learning and participation. Children who have access to multiple devices also engage in a wider range of activities and seem to develop better digital skills.
* Engaging in a wider range of online activities enables children to develop the interest and skills to progress further towards educational, community, interactional, creative and civic activities. The latter two, it must be said, remain the privilege of the few: most children do not undertake either, even though creative and civic opportunities have been much heralded as the promise of the digital age. It is a challenge to policy makers and child rights bodies to find ways to better enable children to enjoy these opportunities, thereby developing their digital skills as our findings show and, importantly, allowing children to exercise their civic and expressive rights.
* Hence, having access to the internet should be regarded as a fundamental right for all children, with special efforts made to include under-privileged children and to encourage all children to take advantage of the full range of online opportunities, thereby furthering their rights to information, freedom of expression and thought.

**Right to education and digital literacy**

* While children are developing digital skills and literacies on their own, systematic support and guidance from institutions, families and significant others is vital to help children as they learn to navigate the digital world. This is a priority area for stakeholder engagement in many GKO partner countries, such as [Argentina](http://globalkidsonline.net/wp-content/uploads/2017/10/Country-example-Argentina-Final.pdf), [Bulgaria](http://globalkidsonline.net/wp-content/uploads/2017/10/Country-example-Bulgaria-FINAL.pdf), [Montenegro](http://globalkidsonline.net/wp-content/uploads/2017/10/Country-example-Montenegro-FINAL.pdf), and [South Africa](http://globalkidsonline.net/south-africa-using-evidence-to-influence-policy/).
* Teaching digital skills and literacies in schools is increasingly recognised as important for realizing children’s rights, but many countries still struggle to achieve this, with some not able to provide internet access in schools. For example, in Ghana only 1 in 10 children use the internet at school compared to Uruguay where more than half of the children have school access. Older children seem considerably more likely to access the internet in school, which may lead to younger children being underserved and, possibly, less able to develop their digital skills. Because children are exposed to similar opportunities and risks online, and differences in their digital skills affecting their ability to make the most of the digital environment and to avoid online risk, it is important to ensure that all children have access, in home and in school, and are given chances to improve their digital skills.
* Children need to master a range of digital literacy skills related to operating with devices and the internet, information-seeking, social and creative activities, critical evaluation, and privacy. Some of the easier skills they develop on their own but to develop more complex skills, such as critical evaluation, creative or privacy skills children may benefit from support.
* A supportive, non-restrictive approach for children’s engagement with online opportunities in a safe and a responsible manner is most effective for the development of their digital skills.
* Improving school access, supported by teacher training, could further link internet use with education and information benefits, specifically by developing children’s – and teachers’ – digital skills.

**Right to culture, leisure and play**

* Children’s internet use is a means through which they explore their identities, communicate and collaborate with other people, pursue their interests and hobbies, and broaden their horizons. While education and information are vital services provided by the internet, social and entertainment uses are generally more popular with children, especially via participation in social networking sites, watching video clips, and playing games, which are amongst the most common online activities in most of the countries where we have done research. In some of the less affluent countries, rather few children are able to watch video clips online, possibly indicating that cost of access might be a barrier to this form of cultural engagement.
* Even for straightforward activities that require few digital skills like watching videos or playing games, there are variations by country - roughly in accordance with the ease of internet access for children.
* Children’s engagement in activities commonly seen as ‘entertainment’ is linked to and likely contributes to their development of digital skills. For example, social interaction and watching videos predict higher privacy skills, while creative activities predict higher critical evaluation skills.

**Protection of privacy, identity and data processing**

* Children’s online activities are the focus of a multitude of monitoring and data-generating processes, yet the possible implications of this ‘datafication of children’ has only recently caught the attention of governments, researchers and privacy advocates. With growing concerns over children’s privacy online and the commercial uses of their data, it is vital that children’s understandings of the digital environment, their digital skills and their capacity to consent are taken into account in designing services, regulation and policy.
* In overview, and overwhelmingly, the evidence documents children’s struggles with and lack of digital literacy or understanding regarding the uses of their personal data in the digital environment, particularly when it relates to institutional and commercial aspects. This is not necessarily for want of interest or ability. Rather, the evidence is clear that children cannot –and cannot be expected to –understand sufficiently many of the ways in which their data is used, or for what exactly their consent is formally required by an online provider.
* Moving responsibilities (to manage privacy and personal data) from children/parents/teachers to online service providers is necessary, since evidence shows it is unfeasible to expect children to sufficiently understand the privacy implications of a complex digital environment, or to expect them to be resilient in an environment which does not provide adequately (or, sometimes, at all) for their developmental needs.

**Protection from violence, sexual exploitation and other harm**

The ways in which internet use can contribute to the risk of harm children face in their lives is of growing concern, posing serious challenges for states in their efforts to protect children. To take preventative action, inform child protection policies and target resources where they are most needed, it is particularly important to generate evidence on which children experience harm linked to their (or others’) internet use. This is a key policy priority in many Global Kids Online countries, including [Ghana](http://globalkidsonline.net/excellent-support-from-key-stakeholders-in-ghana/), [the Philippines](http://globalkidsonline.net/wp-content/uploads/2017/10/Country-example-Philippines-Final.pdf), and [South Africa](http://globalkidsonline.net/south-africa-using-evidence-to-influence-policy/).

* The more time children spend online, the more opportunities they experience, but also more risks. Although older children encounter more risk, their experience of harm is not much different from that of younger children, pointing to the importance of developing resilience to cope with the digital environment.
* The range of risks is wide and can include exposure to self-harm content, hate speech, sexual content, violent content, hurtful or nasty treatment, and bullying.
* While some children may remain risk-free, others encounter multiple risks. Policy must also pay special attention to those who may be of greater vulnerability, due to psychological factors, family situation, indigenous or ethnic minority children, migrants, children in poor or rural settings or those who live with some form of disability.

**Family environment, parenting and alternative care**

* A supportive, non-restrictive approach for children’s engagement with online opportunities in a safe and a responsible manner is most effective for encouraging engagement in online opportunities and the development of digital skills. The development of these skills is enhanced if children feel relatively free to explore the online environment, even if this means encountering some measure of risks or problems that they must learn to deal with to build resilience.
* Restrictive parenting (for example, banning particular activities) tends to reduce children’s creative activities, information-seeking, learning, entertainment and social interaction and may have unintended consequences of reducing overall engagement and digital skills. On the other hand, enabling parental (or caregiver) mediation – for example, that which guides the child or shares the activity with them – positively aids their information-seeking activities. This suggests that it is more constructive for parents to guide, support and share their child’s online exploration than to limit it.
* However, we have found that in some countries parents have less digital skills than their children and are much less often online. For example, in Ghana more than half of the parents (55%) have never accessed the internet and mothers are overrepresented amongst the non-users (63% compared to 43% of fathers) while only 3% of children, in comparison, have never used the internet.
* As parents might lack the skills, knowledge, or awareness to mediate effectively their children’s internet use, they need to be supported to enable them to assist more effectively children’s positive internet use. This seems especially true for some countries where restrictive forms of mediation are much more common than enabling mediation – these are also the countries where children tend to have lower access, participate in fewer activities and have lower skills. While this is not suggestive of a causal relationship, it highlights that these children are significantly less likely to benefit from the digital environment.

**Health and wellbeing**

* Children’s wellbeing is increasingly mediated – for better or for worse – by their access to the online environment.
* Access, skills, risks and opportunities are all part of the overall picture of children’s wellbeing and rights in the digital age and should all, therefore, be kept in mind when conducting research and developing policy interventions.
* If we hope to understand how the digital environment impacts children’s health and wellbeing, it is imperative to account for both online and offline experiences together. What impacts a child online has implications offline, and vice versa. Evidence generation efforts related to child health and wellbeing need to focus on linkages between online and offline experiences and their individual and cumulative impacts, rather than treating online and offline environments as separate.
* In order to enable these benefits and minimize internet-facilitated abuse of children, we need coordinated international action, increased comparable evidence from countries, and a global policy framework.

**How can children’s views and experiences be taken into account?**

* The strategies that promote empowered and safe online experiences should take into account children’s agency, including their desire to experiment and sometimes to take risks, and also their desire to be responsible for themselves and their actions. In bringing children’s own voices and experiences to the centre of research, policy development, legislative reform and programme and service delivery, we hope decisions can be made that serve their best interests.
* Internet is fast becoming part of growing up and becoming independent. As our findings show, when in trouble, many children first turn to their peers. This could serve as an encouragement for those who design programmes and interventions to promote online safety: peer-to-peer education and mentoring may be the most effective way to reach young internet users worldwide. And respecting children as digital citizens may prove more empowering than prioritising safety over thoughtful exploration.

**How can inequalities (originating offline or online) be effectively addressed?**

Children are not a homogenous group and their internet use, opportunities and risks are closely linked to their age, level of digital skills, places of access (school or home), devices they use, support they receive, as well as the wider social life context, influenced by inequalities that exist in their home and societies. The General Comment needs to address the promotion of equality and children’s rights in relation to the digital environment by encouraging all stakeholders to address diversity. For example:

* In the lower-middle income countries, children’s home access was notably lower than in upper-middle income and high-income countries, and the consequences of this - in constraining children’s opportunities to access information, social interaction, digital skills and more – have been evident across the areas of children’s internet use and their ability to exercise their rights.
* In relation to age, there are striking differences in all aspects of children’s engagement with the digital environment. Older adolescents generally gain both more opportunities and skills and encounter more risks, compared with younger children. There are likely to be many explanations for this, concerning parenting, educational policy, government provision and more. There’s no doubt that children of different ages are differently positioned by those responsible for them, and that their experience of the internet is different. It remains contestable, however, whether a more limited experience of the internet is in the best interests of young children, or whether this contravenes their best interests by introducing inequalities.
* Once children gain internet access, gender differences in their usage, skills and risks are generally few. However, there are strong indications from other sources that girls struggle more than boys to get access to devices and the internet, especially in the global South.
* There are indications that socio-economic status of the household matters, or at least the priority given to digital technology in the home – for instance, children with access to more digital devices engage in more online activities and have more skills. They are also more likely to have better support at home.

**How should the General Comment treat the role of parents and other caregivers?**

Policy makers often point to parents as those most responsible for their children’s internet use, but this needs to acknowledge at least two challenges. First, that the complexity and pace of technological change places an arguably-impossible burden on parents to maximise their child’s opportunities and minimise the risk of harm, especially given the many other pressures faced by parents and carers. Second, that policy makers have been less forthcoming in offering parents specific guidance underpinned by evidence, too often telling them simply to reduce screen time or watch what their child does online. This is clearly insufficient.

**How should businesses support the realisation of children's rights?**

Rights by design: the best interests of the child should be the key question to answer in any systematic design of services. Businesses must be required to show how they take the best interests of children into account. Concrete examples of how to account for children’s rights in design are already emerging and could be further promoted.[[1]](#footnote-1)

**How can States better realise their obligations to children's rights?**

* Policy making that has children’s best interest at heart requires a balanced approach that aims to reduce children’s exposure to harm without infringing on their opportunities to benefit from the digital environment.
* Crucially, children’s voices and experiences need to be at the heart of such decision-making processes. Not only to respect their right to be heard, but also because through discussion and cooperation children are able to learn, form their own views and reach consensus together, which is part of developing in a socially responsible and cooperative way and as a psychologically healthy person.
* Policy and practice should encompass the full range of children’s rights including the rights to information, education, protection, privacy and participation; it needs to be holistic but also integrated and mainstreamed in other national policies that a) deal with children in general and b) are aimed at the development of the ICT services and the information society.

**Link to children’s rights in other environments?**

The internet is now contributing to the risks facing children offline (bullying, pornography, and other harms), hence policy and practice focused on the internet should not neglect offline risks, while those focused on offline risks should now take into account their online dimensions.

**Sources used for the report**

* Country reports and data from [Albania](http://globalkidsonline.net/albania/), [Argentina](http://www.globalkidsonline.net/argentina?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Brazil](http://blogs.lse.ac.uk/gko/the-latest-findings-from-kids-online-brazil-on-children-and-the-internet/?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Bulgaria](http://blogs.lse.ac.uk/gko/are-children-empowered-to-benefit-from-the-internet/?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Chile](http://www.globalkidsonline.net/chile?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [Ghana](http://globalkidsonline.net/ghana/), [Italy](http://globalkidsonline.net/wp-content/uploads/2017/10/Executive-summary-Italy-june-2018.pdf), [Montenegro](http://www.globalkidsonline.net/montenegro?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), the [Philippines](http://www.globalkidsonline.net/philippines?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), [South Africa](http://www.globalkidsonline.net/south-africa?utm_source=Innocenti%20Thematic%20Update%20-%20GKO&utm_medium=email&utm_campaign=Innocenti%20Thematic%20Update%20-%20GKO), and [Uruguay.](http://globalkidsonline.net/uruguay/)
* Byrne, J., Kardefelt-Winther, D., Livingstone, S., Stoilova, M. (2016) Global Kids Online research synthesis, 2015–2016. UNICEF Office of Research–Innocenti and London School of Economics and Political Science. Available at [www.globalkidsonline.net/synthesis](http://www.globalkidsonline.net/synthesis)
1. See the [Children’s Design Guide](https://childrensdesignguide.org/) integrating children’s rights and ethics into the design of technologies and services. [↑](#footnote-ref-1)