**Comments by Estonia to the**

**Concept Note for a General Comment on**

**children’s rights in relation to the digital environment by the Committee on the Rights of the Child**

Estonia welcomes the initiative to develop a general comment on the rights of the child in the digital environment. Protection and advocacy of children's rights is one of the priorities of the Estonian Government. Constantly evolving digital world creates a huge potential for everyone from governments to individuals and in particular the children. At the same time the digital environment while offering numerous opportunities and great solutions there are also many dangers and risks that often remain hidden at first sight.

Following the logic of the Concept Note, please find below some comments on specific topics.

* Access to information and freedom of expression and thought

It is vital that States take action to guarantee these rights to all children. This means that States have to take all appropriate measures to empower vulnerable groups (for example children with mental disability, children in institutions). Service providers need to use child-friendly language and design.

* Right to education and digital literacy:

Nowadays without digital literacy, it is difficult to participate fully in the society so it is essential that all children be taught at least basic digital skills. This means that all children should have access to ICT devices.

Digital literacy alone is not enough to be safe online, which is why it is important to teach critical thinking to all children and educate children in age appropriate way about sexuality and safe relationships.

* Protection of privacy, identity and data processing

Child profiling for commercial purposes should be banned. The comment should address aggressive online advertising targeting children. In addition, age declaration cannot be considered age verification. It would be helpful to have guidance or examples or best practice how pupils and teachers should interact in social media.[[1]](#footnote-1) Also it would be important to stress that also parents have to respect their children`s privacy in the digital environment.

* Protection from violence, sexual exploitation and other harm

It is important that all States have effective accessible reporting mechanisms in place that are known to children. 24 h helplines but also web-police has been a success-story in Estonia counselling and educating children and initiating criminal proceedings when necessary.

* Family environment, parenting and alternative care

Parents have the responsibility to guarantee the safety and well-being of their children both online and offline. States should support parents so that they would be able to fulfil their obligations. Digital education and family counselling should be accessible to parents. Parents should be aware of children`s digital rights not to violate the rights of their children by for example posting the photos of their children in social media without consulting their children. On the other hand, parents have the role of limiting the screen-time of their children.

* Health and wellbeing

States should investigate the effects and impact of screen-time and ICT devices on babies and small children and inform the parents of the results. Sexual and relationship education with the aim of teaching mutual respect to children should be accessible to all children.

In addition, the Committee particularly wishes to gather evidence and views on the following questions:

* How can children’s views and experiences be expressed and taken into account when formulating policies and practices which affect their access to, and use of, digital technologies?

It would be wise to use the same channels for contacting children that children use daily – social media platforms, forums, etc. In addition, analyses of the registers of child helpline and web-police would be useful. It might also be useful to establish continual practices of gathering children’s opinions on important policy matters through schools, integrating the practice of formulating and expressing opinions into school curricula.

How can discrimination (originating offline or online) be effectively addressed, to ensure all children have their rights realised in a digital world?

Access to ICT devices to all children through the education system. Default settings of ICT devices for children should be protective of children.

* How should the General Comment treat the role of parents and other caregivers?
* Parents and other caregivers have the responsibility to guarantee the safety and well-being of their children both online and offline. They have a crucial role in making the digital environment safer for their children. Therefore, the comment should address the role of parents and caregivers. Ideally, the comment could maybe give more guidance to states, which questions regarding the digital world should be left to parents to decide and which should be regulated by the state. For example, regarding violent video games and pornographic materials, is there a scientific consensus about what kinds of materials are harmful to which age group, and should there therefore be some non-negotiable age limits, or should all the decisions be left to parents, to be decided, depending on the evolving capacities of each specific child.
* How should the practices of businesses operating in the digital environment support the realisation of children's rights?

Safe default settings for children in devices and for child platform users. Age appropriate design and language. There could be a common code of practice for online services for children. Self-declaration is not age verification, so the businesses should make efforts to create more reliable age verification procedures. States could give awards or nominations to child-friendly businesses operating in the digital environment.

* How can States better realise their obligations to children's rights in relation to the digital environment?

The most important is to invest in supporting parents. Parents are best positioned to mediate their children’s internet use. Emphasis should be put not only on specific knowledge about the digital world, but even more on developing positive, authoritative parenting practices, which include setting clear limits to children, while having strong and warm relationships. If children have positive a trusting relationships with their parents, they are more likely to tell parents if they encounter anything disturbing in the digital world, and thereby the situations causing the most harm to a child’s safety and well-being can be prevented.

* Is the realisation of children’s rights in the digital environment necessary to realise children’s rights in other environments?

Children themselves do not distinguish digital environment and other environments in their lives. They are all combined and mixed for children. Children`s Rights should be protected in all environments where they are and operate.

Estonia has undertaken several activities to raise awareness about and address the issues of children in the context of digital environment. Different examples can be found on the websites of the programme [Smartly on the Web](https://www.targaltinternetis.ee/en/) and [Web Constables](https://www2.politsei.ee/en/nouanded/veebikonstaablid/).

1. See <http://eha.ut.ee/wp-content/uploads/2014/10/3_07_raim_siibak_summary.pdf> [↑](#footnote-ref-1)