**Committee on the Rights of the Child**

**Concept Note for a General Comment on**

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

The digital environment poses broad-ranging opportunities and challenges for States, businesses and non-governmental organizations in respect of all the rights embodied in the United Nations Convention on the Rights of the Child. Governments, businesses, child rights organizations and civil society are all calling for principled, evidence-based guidance to shape the interpretation and implementation of the Convention in a digital age.

The Committee on the Rights of the Child decided in 2018 to develop a General Comment on children’s rights in relation to the digital environment. This will clarify how this rapidly evolving environment impacts on the full range of children’s rights in positive and negative ways. The purpose of the General Comment will be to strengthen the case for greater action and elaborate what measures are required by States in order to meet their obligations to promote and protect children’s rights in and through the digital environment, and to ensure that other actors, including business enterprises, meet their responsibilities.

Since the rights of the child are universal, indivisible and interdependent, the General Comment will provide an overarching framework. Cross-cutting general principles important in the digital environment include: non-discrimination; the best interests of the child; the right to life, survival and development; the right to private life and data protection, and the child’s right to be heard in matters which affect them.

The Committee seeks submissions from all interested parties so that the General Comment reflects the widest possible expertise and experience. Submissions might address the general measures of implementation by State parties needed to realise children’s rights in relation to the digital environment. Also important will be how children access digital technologies, and matters of international cooperation and internet governance.

A possible structure for the General Comment centres on key groups of rights to be realised in a digital world, namely:

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

Young people aged under 14 surfs daily on the web by common pc or tablet; young people aged between 12 and 17 have a personal smartphone, pc and television: this could increase the risk of cyber-bullying and cyber-violence and the adolescents rarely refer to parents what they’ve experienced. As far as videogames parents do not know their classification and self-regulation (i.e. PEGI) and more in general both young people and parents are not aware about protection measures. At the same time another harmful tool is the television, where children are both mentioned and recipients of messages about social networks and the Internet, without including in these messages vigorous alarming about privacy violation, trade profiling, access to hatred and violent contents.

In Italy the Self-Regulation Code Media and Children, signed in 2002, got into force and has been included in Act No. 112/2004 on the broadcasting system, converted into Unified Text/Legislative Decree No. 177/2005, as amended by Legislative Decree No. 44 of 15 March 2010 (*Attuazione della direttiva 2007/65/CE relativa al coordinamento di determinate disposizioni legislative, regolamentari e amministrative degli Stati membri concernenti l'esercizio delle attività televisive).*The Committee for the implementation of Self-Regulation Code Media and Children works in collaboration with the National Authority of Communication (AGCOM) and the competent parliament commission in relation to the Code, independently from the participation and the platform used. In case of non- compliance with legislation in force an administrative sanction (from 25.000 to 350.000 Euros) could be assumed, and completed by the suspension of the concession or the authorization from 3 to 30 days, until the closure of the service. Assumed that it’s up to broadcasting companies to protect children in predetermined hours, a filter mechanism (Parental Control) to protect children from dangerous images and inappropriate and harmful contents is operational: it is based on a secret PIN code hold by a parent who could block the access to programs, jointly with audio and video alerts. Parental Control takes into consideration several factors as to children’s impact on the development of children: violence in all its forms, included its incitement; pornographic images and scenes; inducement or legitimization of behaviors in violation of fundamental rights (i.e. excessive consumption of alcohol and drugs, gambling). Moreover, it provides for alert broadcasting and advertising mechanisms (red/orange/vocal signal), useful to protect children.

Furthermore in last years Italy has launched several activities and projects to analyze the relationship between media and young generations, to encourage them to adopt correct web behaviors, in order to be safeguarded from dangerous activities such as gambling, pornography, illegal activities, copyrights violation, identity removal and falsification, data protection violation, the participation to discriminatory conducts and incitement to hatred, violence and cyber-bullying. The following are worth of mentioning:

* the White Book “Media and Children”, released by the National Authority of Communication in 2014 in collaboration with CENSIS and aiming at promoting a debate over the new challenges of the digital age tools and the media access and use by children as well as their parents considerations; moving from an overview on the existing literature on the matter, the products of the national public and private broadcasting, digital, satellite and cable providers, and the rules in force to access the new media by children and adolescents (digital, satellite, cable channels, videogames, Internet, electronic publishing and “enhanced tv”, IPTV, PVR, VOD, Mobile Tv, Web Tv) were examined
* the “Generazioni Connesse“ project, which is the Italian Safer Internet Centre co-funded by European Commission: it aims at continuing the experience that has been underway since 2013 and, at the same time, improving, strengthening and broadening the role it has undertaken at a national level by the Safer Internet Centre to become an ever-greater national reference point on topics related to a safer and better Internet for young people. The Safer Internet Centre is made up of an Awareness Centre, two Hotlines, and a Helpline; the Consortium that operates in the Safer Internet Centre is coordinated by the Ministry of Education, Universities and Research (MIUR) in partnership with the Ministry of Internal Affaire – Postal and Communication Police, National Ombudsperson for Childhood and Adolescence, University of Florence, University of La Sapienza – Inter University Centre, Save the Children Italia Onlus,  SOS – Il Telefono Azzurro Onlus, Social Cooperative E.D.I., Movimento Difesa del Cittadino, Skuola.net; the Consortium takes advantages by an Advisory Board that expands to public, private and third-sector players. The general objective of the project is that of encouraging the right conditions for the promotion of initiatives that help make the Internet a better and more trusted place for children and young people. While the project is addressed primarily to children and adolescents: 6 – 18 years old however parents, educators, teachers  and youth professionals will be involved
* the publication of the Report on the Protection of minors in the media sector, released in 2017 by the ad hoc Working Group established at the National Authority for Childhood and Adolescence within the National Advisory Body composed of civil society associations and organizations: it concerned the role and relationship of minors with the multi-dimensional media framework (newspapers, traditional and digital media, social networks).

Moreover, in February 2019, the Department for Family Policies launched a new communication campaign on the risks of cyber-bullying entitled “Stop al Cyberbullismo” (“Stop Cyberbullying”). The new campaign’s main objective is on the one hand to inform families about all the available tools and services for victims of cyber-bullying and, on the other, to provide recommendations and suggestions for parents of cyber-bullies. The above-mentioned campaign was elaborated with the technical and professional support of the Innocenti Institute, a well-known educational and child policy-oriented research centre based in Florence. The campaign consists of two practical tools: a promotional video, and a toolkit, both available on the Department’s website at <http://www.politichefamiglia.it/it/notizie/notizie/notizie/stop-cyberbullismo-campagna-di-comunicazione-istituzionale/>.

Finally, it is important to underline that the Department for Family Policies and the Ministry for Education, University and Research jointly organised the 2019 Safer Internet Day in Italy, precisely focused on the issues related to cyber-bullying. The event took place in February 2019 in Milan with the title “Against cyberbullying: a new alliance between schools and families”. To better engage with the youth attending the event, the most known Italian youtubers were invited to take part in the event as speakers.

* **Right to education and digital literacy**

Education in the digital age must be viewed above all as a cultural initiative. It begins with a new concept of school: an open space for learning — more than just a physical place, a springboard that enables students to develop skills for life. In this vision, technology is empowering, habitual, ordinary and ready to serve the school, primarily in activities aimed at training and learning, but also in administration, spreading to — and in fact bringing together — all school settings: classrooms, common spaces, laboratories, private and informal spaces. No educational process takes place without intensive teacher-student interaction, and technology cannot be separated from this fundamental human relationship. Simply introducing more technology in schools is no longer sufficient; if we concentrate our efforts solely on technology we risk ignoring the larger issues, namely knowledge and culture.

Along this approach Italy has promoted several interventions concerning the right to education within the digital environment:

* the Italian National Plan for Digital Education (*Piano Nazionale Scuola Digitale* — PNSD), which is a policy launched by the Ministry of Education for setting up a comprehensive innovation strategy across Italy's school system and bringing it into the digital age; the Plan answers the call for a long-term vision for Education in the digital age directly linked to the challenges that all of society faces in applying and promoting life-long and life-wide learning, in both formal and non-formal contexts: it aims at introducing innovation in Italian schools, with cohesive programmes and actions organized into five main areas: tools, skills, content, staff training and supporting measures
* the adoption in 2015 of the ad hoc Guidelines and then the National Plan for the prevention of bullying and cyber-bullying at school, providing *inter alia* the following actions:

- teachers’ training involving more than 16.000 teachers;

- the blue knot: a symbol to counter bullying, launched on 7 February 2017 (Safer Internet Day) on the occasion of the presentation of the best projects in this field and the realization of many awareness raising initiatives in schools;

- the creation of tv and radio spots by children, evaluated by an ad hoc commission, to be produced;

- the implementation of the above mentioned “Generazioni connesse” national network reinforcement to educate young generations to a responsible use of the Internet and to involve parents and web providers to guarantee a safer Internet; in this framework a MoU was signed by the Ministry of Education and Police Forces/Communication Police to promote a series of initiatives in theaters and schools to prevent bullying and discriminatory web contents inciting to racial hatred and violence (this project has involved in 2016 more than 2.500 schools, 20.000 teachers and 200.000 students);

- helplines: a free number is provided for by Telefono Azzurro, being accessible for children, adolescents and parents who are advised about territorial support services. This tool has been developed also in a chat-room;

- Friendly School Bulloff: training project carried out by the Ministry of Education in partnership with UNICEF Italy to implement UN CRC Art. 29, including the education to legality and to bullying prevention.

Finally in 2018 the Minister for Family and Disabilities, Mr. Lorenzo Fontana, and the Minister for Education, University and Research, Mr. Marco Bussetti, signed a Memorandum of Understanding aimed at better informing families about the risks linked to children freely surfing the Web.

* **Freedom of assembly**

The opportunity to involve young generations in public processes directly involving them to promote the highest protection of children’s rights has been pursued in Italy according to a comprehensive, inclusive and integrated approach. Two relevant initiatives could be mentioned on this topic:

* CoNNGI – Coordinamento Nazionale Nuove Generazioni Italiane, which was established in October 2016: the supporting associations signed a Memorandum of Understanding, thus accepting the contents of the 2016 Manifesto, and on 13 October 2017 CONNGI officially became a Social Promotion Association (Associazione di promozione sociale – APS) and was enrolled in the relevant public register, so acquiring legal personality - nowadays CONNGI consists of 32 associations and is part of the National Observatory for Integration of Foreign Students and Interculture (established at the Ministry of Education, University and Research), of the Migration and Development Table of the National Council for Development Cooperation (established at the Ministry of Foreign Affairs and International Cooperation), and it was also invited by the National Observatory for Childhood and Adolescence; its main aims are: promoting a new approach towards inclusion and participation policies capable of paying more attention to the new generations’ real needs; creating and reinforcing relations with institutions and organizations; promoting a fruitful exchange among the associations representing youth with a migratory background so as carrying out advocacy activities on principles and priorities stated in the Manifesto, at national and international level
* Since 2014 the General Directorate for Immigration and Integration Policies – Ministry of Labour and Social Policy launched a call for proposals through the Migrants Integration Portal, that gave start to the project “Filo diretto con le seconde generazioni” (“Direct Line with Second Generations”): it is a network of about 30 associations of youth with a migratory background, which began to have two meetings per year in order to share their analyses and experiences, co-planned a Manifesto organized around four scopes of action (school, work, culture and sport, active participation and citizenship); the Manifesto was divulgated and promoted among relevant institutions, administrations, national and international organizations and was revised in 2016 and named “Manifesto delle Nuove Generazioni Italiane" (“Manifesto of the New Italian Generations”, a more inclusive definition considering the complex reality represented, as well as the issue of citizenship and political representation), and is currently being updated again.
* On the occasion of the *European Day for the Protection of Children against Sexual Exploitation and Sexual Abuse* and for the *International Day on children’s rights*, the Department for family policies organized an event last November 2018, aimed at promoting families and Institutions cooperation for the prevention and protection of children involved in acts of cyber-bulling. Students from different high schools took part in the event and spoke about their experiences relating to cyber-bulling phenomena.
* Right to culture, leisure and play
* **Protection of privacy, identity and data processing**

As it concerns the protection of privacy of minors, the National Data Protection Authority has adopted in 2017 an Opinion on request of the National Authority for Childhood and Adolescence relating to the compliance of the domestic framework to the EU Data Protection Regulation.

In addition to the adoption of specific decisions on the processing of data related to minors (see below), over the years the National Data Protection Authority has worked on several awareness raising campaigns on the protection of personal data related to children in the digital environment, including a vademecum on Social Privacy whose aim is to provide guidance to avoid pitfalls of social networking (2014), a vademecum on privacy at school (2016), and guidance on smart toys (updated on 2018).

It should be also mentioned that minors in the Italian legal framework enjoy a specific protection in respect of the processing of data related to them carried out by media, both in the digital and traditional environment. In the deontological rules on to the processing of personal data in the field of journalism, attached to the Italian Data Protection Code, the right of the child to privacy enjoys a primary protection and the dissemination of information/images related to minors must be balanced with the reasons of significant public interest and the limits of the law in respect of publication, also in accordance with the principles and limits established by the "Treviso Charter".

Moreover, the Data Protection Authority has a relevant mandate for the prevention and the countering action of cyber-bullying involving children, according to Law No. 71 of 29 May 2017. This legislation has provided for a comprehensive definition of the phenomenon (Art. 1) concerning children as victims as well as offenders, providing for accurate and targeted interventions in the school setting at large.

Children aged above 14 in their role of victims — their parents or guardians — could send a complaint to the administrative referee or the Internet/social media provider to close, remove or block the online contents. If the outcome is not achieved within the following 24 hours, he/she could further submit a compliant to the National Data Protection Authority waiting for its intervention within the following 48 hours (Art. 2). The Law has also provided for the establishment of a Technical Working Group aimed at proposing plans and related actions in this field (Art. 3), created by Decree of the Presidency of the Council of Ministers No. 2566 of 26 October 2017 and put under the leadership of the Ministry of Education: the first meeting was convened on 6 February 2018.

Art. 7 of the Law under reference has also introduced a preventive measure, the admonition, which can be adopted by the Commissioner (*Questore*) upon instance of the injured party, towards the minor responsible for cyber-bullying and who is aged under 14, before a complaint is filed. The request of admonition concerns the minor responsible for the crimes of insulting behaviour (Art. 594 of the Civil Code), defamation (Art. 595 of the Civil Code), threat (Art. 612 of the Civil Code) of unlawful processing of personal data (Art. 167 of Legislative Decree No. 196/2003), crimes frequently linked to cyber-bullying committed through the Internet by minors aged under 14. The Commissioner, for the admonition purposes, summons the minor together with a parent or other person exercising the parental responsibility. The effects of the admonition end when the admonished person comes of age.

Moreover ad hoc guidelines will be adopted by the Ministry of Education in collaboration with the Postal and Communication Police to be updated every two years in order to facilitate the implementation of the legislation in schools: these guidelines will inform the monitoring activities carried out by teachers selected as main referees to inform parents of children victims of cyber-bullying and the provision of disciplinary sanctions. Within this framework the National Data Protection Authority signed a MoU with the Postal and Communication Police on 28 December 2017 to reinforce the cooperation against cyber-bulling. 31. To fill a complaint to the attention of the National Data Protection Authority a proper website section is accessible to download materials and documentation, completed by an ad hoc webmail ([cyberbullismo@gpdp.it](mailto:cyberbullismo@gpdp.it)).

As far as the reports received and handled by the Authority from July 2017, they mostly concerned the creation of fake profiles — at times for the purpose of exchanging sexually-oriented messages — and the dissemination of abusive messages and/or pictures taken in a private context; to protect data subjects, the Authority contacted social media and website managers both in the EU and in third countries. The most part of the complaints resulted into the removal of contents..

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

By Decree No. 154/2018, the Minister for Family and Disabilities has been delegated to coordinate all the activities carried out by Public Administrations related to prevention, assistance, legal advice, and protection of minors by sexual abuse and sexual exploitation according to art. 17§1 of Law No. 269 August 3rd 1988, and related to the fight against child pornography according to Law No. 38/2006.

On a later stage, in compliance with Law No. 97/2018 concerning the reorganization of competences of ministries, including on the topics of family and disabilities, the Presidency of the Council of Ministers (or the delegated Minister for Family and Disabilities) currently exercises the Government’s functions concerning the National Observatory for Childhood and Adolescence, the National Centre for the Documentation and Analysis for Childhood and Adolescence, the Observatory for the Fight against Paedophilia and Child Pornography, and is responsible for the coordination of the National Fund for Childhood and Adolescence, all the policies for persons with disabilities, also with reference to their school inclusion, accessibility and mobility.

Within this framework the Observatory for the fight against paedophilia and child pornography is worth of mentioning: indeed it is in charge for the definition and implementation of governmental activities concerning support, including legal advice and protection and defence of minors from sexual exploitation and sexual abuse, as follows; study and research on the issue; study and analysis of the data provided by Public Administrations; information about the activities carried out, also through the website and the dissemination of specific publications; collection of data about the monitoring activities and the evaluation of achievements, coordinating methods and typologies ensuring their homogeneity; implementation of a database, aimed at systematically unifying all the information coming from other Administrations, allowing a deeper knowledge of the issues focusing on minors victims of sexual crimes.

In relation to the issue under exam, two actions should be mentioned:

* within the framework of the CREATIVE (Changing Relationships through Education and Awareness Towards endIng Violence against women) Project, the elaboration and dissemination of a digital APP (and a related supporting document for teachers) informing youngsters on the phenomenon of and the risks related to bullying and cyber-bullying was promoted; the APP will provide information in a youth-friendly language through games, comics, quizzes, etc, is available free of charge for downloading from the main mobile online stores; knowledge of the APP will be raised among students by the Ministry of Education, University and Research through a specific communication to all lower secondary schools in Italy together with one-page guidelines for teachers to explain the importance of the APP’s contents. Following the dissemination of the APP, a public competition for lower secondary schools on this topic will be organized by the Presidency of the Council of Ministers. Furthermore, in 2016, the same Presidency signed a MoU with the National Authority for Childhood and Adolescence providing for, inter alia, the collaboration aimed at disseminating knowledge on the rights of children and adolescents in order to prevent bullying and cyber-bullying
* an innovative awareness raising campaign called “Project Blue Box”, dealing with the phenomenon of juvenile uneasiness: it has been faced by the Central Anti-Crime Directorate of the Italian State Police by providing young people and their families with support whenever there are difficult family situations, cases of misuse of the social networks and of the Internet or cases of bullying and self-inflicting injuries (the so-called “blue whale”); the Police Headquarters organized several events and used mobile stations such as campervans at meeting places and youth centers or at school, in order to build confidence with minors, to inform and advise them about the dangers arising from the Internet; the Police mobile stations are equipped with blue boxes to gather reports, even in an anonymous form
* a latest State Police prevention initiative is the YOUPOL APP allowing every citizen to send reports concerning bullying and drug smuggling. At present this App is active in all the regional capitals and will be operational in all the Italian provinces as of August 2018.

Furthermore, in this context an overall activity over the relationship between children and the web is carried out by the Postal and Communications Police Services and different Field Units on the Italian territory. In 2017 the Service took part as leader in the drafting of a paper developed by the Working Group on the Protection of Children in the Communication World, within the Advisory Committee of associations and organizations established and chaired by the National Authority for Childhood and Adolescence (https://www.garanteinfanzia.om/si tes/default/files/la tutel a dei m i norenni nel mondo della comunicazione.pdf).

Following a general overview of the relevant national and international legislation, several cases reported by media and an accurate consideration on the key issues in this area, the above-mentioned paper deals with two specifically complex and sensitive areas, such as Radio Tv communication and the Web.

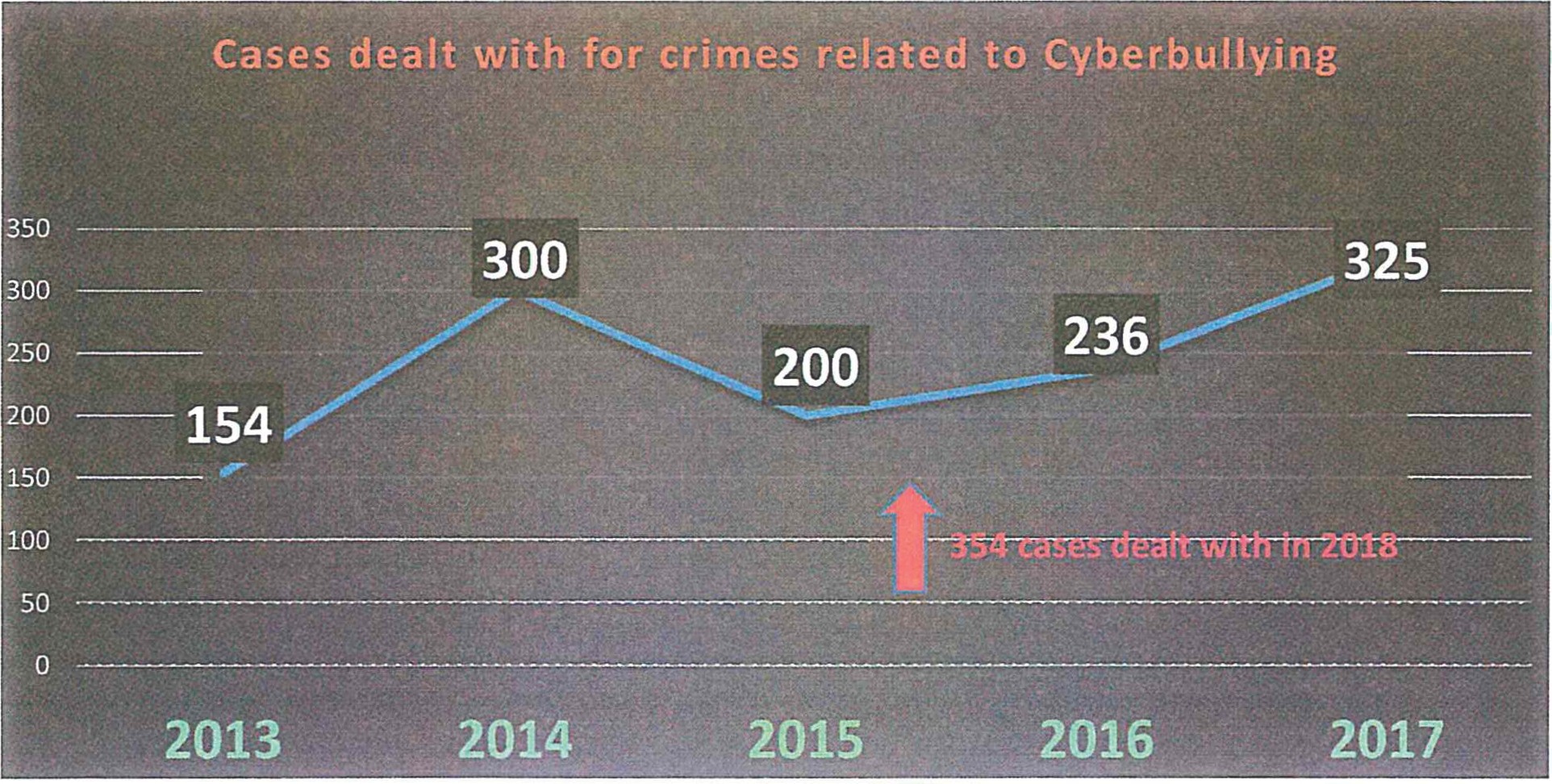
Under the guidance of the National Authority, the following main national stakeholders in the field of child protection in communication world participated into the drafting process of the paper: several major representatives of Italian Judicial Authority, associations advocating the respect of legality, Facebook, members of national public Tv network RAI, most relevant Italian NGOs dedicated to child protection on the web (i.e. Telefono Azzurro and Save the Children); Postal and Communications Police representatives, members of Judiciary Associations (AIMMF), National Register of Journalists, Arciragazzi, National Communications Regulating Authority (AGCOM) and the Authority for the Protection of Personal Data, representatives of UNICEF, *Safer Internet Centre* - "Generazioni Connesse" - Ministry of Education, University and Research (MIUR).

It was deemed useful to submit the final report along with supplementing documents and contributions: several provisions (such as AGCOM orders and formal notices) for each subject matter; main regulatory sources (Synoptic Framework); key challenges in the relationship between children and the web (on the issue of out-of-home children and the web); consensus in digital environment: perception and awareness between adults and teenagers; insight into the Centre for Combating Pedophilia Online; main provisions concerning the right of privacy, the protection of personal data and identity, with particular reference to children and the media; risks in digital environment, operational data and activity of Telefono Azzurro.

In 2000 within Postal and Communications Police Service the Cybercrime Analysis Unit *(Unità di Analisi del crimine informatico* - *UACI)* was created, consisting in a team of National Police Psychologists combining socio-psychological skills with policing activity in countering child sexual exploitation and abuse in its different forms, including cyber-bullying and online offending against children. The Unit analyzes and studies cyber-bullying phenomenon, participating to the development process of Law No. 71/2017, with research activity carried out in cooperation with the University "La Sapienza" of Rome, Department of Juvenile and Community Justice and Juvenile Penitentiary Health Units. The outcomes of this research and inter-ministerial cooperation led to the drafting of the Guidelines "Safe Web" for parents and teachers, contributions included in the volume published in 2018 by Hogrefe *Violence in a click,* as a practical tool aimed at facilitating the handling in school environment of cases relating to online risks.

Furthermore, in 2018 about 140 Special Police Units officers have been trained by UACI, in order to standardize learning models and contents aimed at preventing online risk for children at school.

UACI provides for monitoring, interpreting and analyzing new emerging forms of online risk for children *(online challenges and games; pro-ana and pro-mia social groups; self-harm, etc.),* through a constant comparison with the relevant literature in the area, in order to supplement the contents of awareness raising initiatives undertaken by this special Unit.



* **Family environment, parenting and alternative care**

According to legislation and related executive measures adopted within the Italian framework, several actions have been implemented to collect data, analyse the conditions of minors and their families, provide for the establishment of networks facilitating the access and use of public services.

Legislative Decree No. 147/2017 establishes (Art. 21) the creation of a **Protection and Social Inclusion Network**, as a body aimed to strengthen and coordinate the system of social services and interventions and to draw up guidelines, as stated by Law No. 328/2000. The Network is a permanent body based at the Ministry of Labour and Social Policies and chaired by the Minister of Labour and Social Policies and brings together representatives from the Ministry of Economics, the Ministry of Education, the Ministry of Health, the Ministry of Transportation and the Department for Family Policies together with representatives of Regions, local bodies, social security organisms and non-profit sector. The Network’s aims are to establish a coordination and an integrated planning of social policies. It moves from the creation of an unitary informative system for social services (**SIUSS**) as a national data collection and monitoring system on issues related to children. According to collected data, the Network draws up the National Social Plan, the Plan of Intervention and Social Services against Poverty, the Plan for Disabled people and guidelines on specific topics related to the policies of social intervention and protection. Moreover, the Network gives its advice on the National Plan to fight Poverty.

On 19 April 2018 the Unified State-Regions Conference started, with the agreement of the Government, Regions and local authorities, the implementation of **SINBA** (Information System for Childhood, Adolescence and Family). According to Art. 5§3a a of the Inter-ministerial Decree No. 206/2014, SINBA is the national register aimed to collect all the information flows, at least on out-of-home children, across all Regions.

Furthermore, an ad hoc action has been carried out by the General Directorate for Immigration and Integration Policies for the census and monitoring of UAMs present in Italy. According to Italian Law No. 47/2017, these duties are carried out through the National Information System regarding unaccompanied Minors (SIM): the system registers the entrance and the following path of the child in the Italian territory; in particular, for each child the system registers personal data, eventual identification document and information about concluded or pending administrative procedures, such as guardianship or application for asylum; each involved actor, identified according to the competencies defined by Law (such as Municipalities and Regions), have access to this system and can display or insert relevant data; finally statistical and monitoring reports, containing aggregated and anonymous data concerning the presence of UAMs on the Italian territory, are periodically published on the institutional dedicated website.

The Ministry of Interior supports municipalities through the National Fund for the reception of UAMs for the services they have provided. Currently, local care facilities still host the majority of UAMs. This economic contribution can amount to up to 45 euros per day per child, VAT included. An electronic system (System for the monitoring of UAMs’ presences - SIMP) keeps track of the requests from and payments to the municipalities based on the number of presences of UAMs that they have reported. Since January 2019, the SIMP and the SIM, which belongs to the Ministry of Labour and Social Policies, have become more integrated, also in view of simplifying procedures and strengthening the monitoring of UAMs throughout the Italian territory.

Since 2015, the Ministry of Interior has activated first reception shelters with the resources of the EU Asylum, Migration and Integration Fund (AMIF). They provide specialised services to UAMs for a short period of time in view of their transfer to second/longer-term reception within the SPRAR (now SIPROIMI) network. An electronic procedure is operational in such shelters for monitoring and analytical purposes, whereby:

* the reception shelters’ staff sends every two weeks to the Ministry of Interior an updated database with the details of the UAMs hosted (nationality, date of birth and procedures activated);
* the Ministry of Interior receives a daily report on the number of UAMs in each reception project;

In addition, qualified personnel of these reception shelters fills in a personal file for each UAM containing information on its history, health and special needs, as well as an assessment of the best interests of the child. Often, an electronic version of this file is produced. This facilitates the transmission of information to the second-reception shelter where the minor is transferred in order to plan targeted reception measures.

UAMs hosted in such shelters have access to PCs. Their use is regulated and happens under the supervision of the reception staff in order to safeguard the child, including from risks of trafficking. For the same reasons, initial communication with family members takes place in the presence of a cultural mediator.

Finally, a few shelters have developed apps to map the territory and promote the child’s knowledge of locale services and, therefore, their integration.

* **Health and wellbeing**

As above reported, under its mandate the National Data Protection Authority has been requested to issue some opinions relating to the compliance of the domestic framework to the EU Data Protection Regulation with reference to: the acquisition of health data of children and adolescents through ICTs and new media tools; the privacy of Italian and foreign minors aged under 16 under the obligation to submit information on vaccines to ensure the protection of public health and epidemiological safe conditions by adopting an uniform and simplified procedure for the exchange of sensitive data among schools and local health units all over the national territory – according to Legislative Decree No. 73/2017.

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 is a matter of fact that children enter into contact with media in the early childhood and that they assume a passive condition. This encompasses a co-accountability to perform their role in terms of active participation and consultation in all decision-making processes affecting them both directly and indirectly.

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

Offline and online discrimination should be addressed especially within the school environment, e.g. strengthening the promotion and protection of the right to education while granting full and guided access to ICTs within family and school environments. It means, for example, to outline cohesive programs and actions to propose tools, skills, content, staff training and supporting measures, having achievable objectives linked to specific actions that will enable to improve the family and school systems as a whole.

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

Both parents and caregivers are called to play different roles: self-training; support & facilitation for accessing to ICTs; confidentiality and open dialogue with minors. Indeed this means a double responsibility for adults: on the kind of contact, attitude and access to the digital world; on the media contents, in terms of protection from dangerous images and on the same contents to be consciously used as a cultural means.

* **How should the practices of businesses operating in the digital environment support the realisation of children's rights?**

The protection of children’s rights in the digital environment request for a collective commitment, demanding contributions not only from traditional public actors, who already work daily to create a more modern and innovative society responsive to children and adolescents’ needs, but also from the communities and private stakeholders touched by the new ICTs challenges. So far they are required to ensure the formal compliance of their business activities with children’s rights; to adopt self-conducts & ethical behaviour; to carry out preliminary assessment on impact of business products & ICT’s facilities towards children and adolescents.

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

States’ authorities should be called to work for the establishment of a permanent partnership environment with all public and private stakeholders; the elaboration and adoption of hard and soft norms dealing with the digital environment and ICT’s challenges; the continuous promotion of awareness raising and information tools at large.

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

Yes, according to the holistic approach enshrined in the UN CRC Convention whereas public and private – institutional and non-institutional – actors could get in contact with children and adolescents to ensure the compliance with the CRC Convention provisions and to be accountable for the promotion and protection of all civil, political, economic, social and cultural children’s rights.

The Committee welcomes the submissions of all interested parties as a contribution to this important work. All interested parties are invited to submit relevant research; knowledge of the sector; findings from consultations with children; examples of laws, policies or programmes; or evidence of good practice that would contribute to the drafting process. In parallel, wide-ranging consultations with children in diverse contexts across multiple countries, as well as with experts from relevant fields, will be undertaken to ensure that their perspectives are fully reflected in the General Comment. After due consideration of all inputs provided, the Committee will prepare a first draft of the General Comment for additional consultation with relevant stakeholders.