**Comments by Ukraine to the Concept Note of the General comment on children’s rights of the child in relation to the digital environment**

One of the priorities of the national children protection policy in Ukraine is ensuring the safety of children, respect for their rights and the best interests. Particular attention is paid to the process of creating a safe environment, developing preventive mechanisms against all forms of violence, combating domestic violence and child abuse, bullying, sexual exploitation and sexual abuse.

Children access the Internet daily and they are vulnerable to various types of violations, which are often invisible. Their rights should be fully respected, protected and fulfilled both offline and online.

According to the independent investigation by the international agencies, as of today more than 200 thousand children aged from 5 to 18 use the Internet, and more than 71% of them are active users. This number is constantly growing.

At the same time, only 15% of adolescents are aware of the risks they may face online and fewer than half of them have an idea of the basic safety rules. In this regard, there is a need to strengthen the safety of children in the digital world, the necessity of introduction of innovative preventive methods and approaches that respond to current challenges and tendencies in the field of IT technologies.

To that end the National Police of Ukraine has developed an Internet Patrol project as a preventive measure for children and parents. It aims to monitor dangerous content for children, establishing the location of missing children, the introduction of online platforms for providing online consultations for children and their parents, and the creation of a secure environment for children in the digital space.

In order to respond adequately to the challenges related to activities of anti-social groups in the information space, in particular social networks, the National Police of Ukraine established a permanent operational group consisting of police units of cyber police and juvenile prevention units with day-and-night contact in every region. The group has a round-the-clock contact with units on duty of the Directorates General of the National Police in the regions and in Kyiv.

The cyber police reacts to each report on the participation of children in relevant dangerous groups. They carry out an expert study of computer equipment, monitor children social networks on whether they participate in these groups as well as monitor correspondence with friends on possible intentions to commit suicide. They identify persons who may induce children to commit self-harm or suicide, with subsequent blocking of the work of such groups.

These measures by the units of the cyber police help to block those groups. That, in turn, enables to prevent the criminal offenses against children and young people, as well as to prevent children from committing self-harm or suicides.

At the same time, a systematic work has been carried out with the media and educational institutions on the safety of children in the information space and the prevention of juvenile involvement in the suicidal communities.

In order to improve the work on combating children trafficking, different kinds of trainings for police officers, including workshops and seminars, on children's rights protection are being conducted with the participation of international experts, with the special attention being paid to strengthening the safety of children in the digital world.

Ukraine recognizes the urgent need for prompt actions to address key challenges to children’s rights in a digital world, namely sexual violence and exploitation, privacy and freedom of expression, online safety, digital literacy, mental health issues etc.

In 2018, 1474 children became victims of serious and grave crimes, of which 443 were victims of sexual exploitation and sexual abuse. These crimes are extremely dangerous and testify to the need to strengthen the protection of the rights and social guarantees for children.

The rates of child abuse and exploitation, including sexual abuse and violence, remain high. On the other hand, there is a problem of lack of the specialists in the field of assistance to children-victims of violence.

The Ukrainian authorities constantly take measures to raise awareness of children’s rights online. In particular, on May 6, 2018 the Ministry of Justice of Ukraine initiated the anti-bullying legal awareness campaign as part of the national project
“I HAVE A RIGHT!”. According to the survey conducted by UNICEF in Ukraine in 2017, 67% of children faced bullying (either as a victim or as a witness) and 40% of the victims of bullying did not seek help. The campaign is aimed at fostering a zero tolerance policy towards bullying as well as at raising awareness of possible response mechanisms to incidents of bullying, including cyber-bullying and protection of victims.

The Ministry of Justice of Ukraine has drafted leaflets and posters containing algorithms of actions for persons who suffered from bullying, including cyber-bullying, or became witnesses thereof. On 11 September 2018, the Ministry of Justice of Ukraine coordinated an Anti-Bullying Week. During the respective period, public lessons on combating bullying were provided in schools along with awareness events with the participation of the National Police of Ukraine staff and celebrities. In general, the Anti-Bullying Week comprised 2 896 events, in which 115 539 persons participated.

Further on, the Ministry of Justice of Ukraine is preparing a legal awareness campaign aimed at combating cyber-bullying. The Ministry of Justice of Ukraine together with the NGO “Go Global!” initiated a pilot project on teaching school-age children foreign languages in language camps “Go Camp”. More than 40 schools from different regions of Ukraine participate in this campaign. The program contains a separate block on security of children in Internet and combating cyber-bullying.

Ukraine strongly believes that keeping children safe online would contribute to a better protection of children’s rights in other environments.

 The State Social Programme “The National action plan on the implementation of the Convention on the Rights of the Child for 2017–2021” (approved by the Cabinet of Ministers of Ukraine on May 30, 2018, № 453) was developed to improve the government policy for ensuring and protecting the rights of children in Ukraine as a logical step further in line with the previous “National action plan on the implementation of the Convention on the Rights of the Child for the period until 2016”. The programme takes into account the international experience in child protection and contributes to the development of refined model of functioning of governmental agencies and local self-government at all levels to ensure the best interests of children. The goal of the Programme is to ensure consistent implementation of the Convention on the Rights of the Child provisions; to establish an effective system for protecting the rights of the child at the local community level under de-centralisation process; to create a child-friendly environment. One of the key priorities of the programme is to create a safe informational space for children and to guarantee:

* protection of the child’s personal data and other confidential information;
* ensuring the child’s safety in the digital environment;
* development of policy for preventing manifestations of radicalism, racism, xenophobia and other forms of extremism among children in the context of rapid development of information technologies;
* inclusion of the issues of cyber safety in educational programmes for children aged 7 to 14 years, and in advanced training programmes for teachers;
* introduction of the system of counselling of parents on keeping children safe online.

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