

Childnet response to the Committee on the Rights of the Child on the General Comment on children's rights in relation to the digital environment



Person responding:

Will Gardner, CEO, Childnet

About Childnet

[Childnet](#) is a children's charity with a mission to help make the internet a great and safe place for children and young people. Since 1995 Childnet has delivered a positive impact with its empowering, youth-led, evidence-based and collaborative approach to empower children and young people to use the internet safely and positively.

From its [innovative resources](#) for 3-18s, parents, carers and teachers, to its [pupil powered e-safety](#) programmes, Childnet has stayed at the cutting edge of the latest technology trends by speaking to thousands of children and young people face-to-face each year.

As one of three charities in the [UK Safer Internet Centre \(UKSIC\)](#), Childnet coordinates [Safer Internet Day](#) in the UK, which reaches millions of children every year.

Childnet have a strong track record in working with partners around the world. In 1998 we worked to connect hotlines across Europe, establishing the INHOPE Forum which went on to become the INHOPE Association. In our role as one of three charities in the UKSIC we are part of the INSAFE network of European Safer Internet Centres, continuously sharing and learning from each other. In December 2017 we published an important research report (as part of [Project deSHAME](#)) looking into online sexual harassment among children, working together with NGOs in Hungary and Denmark, and the findings were more similar than not between the experiences of young people in these three countries. Childnet regularly speak at events and conferences and work in partnership with organisations across the world. We have worked collaboratively with NGOs, as well as with governments globally, and also industry, and we are members of both Facebook's Safety Advisory Board and Twitter's Trust and Safety Council and the Executive Board of the UK Council for Internet Safety.

Overview

We welcome a new international standard for children's rights in a digital world. Digital technologies have rapidly become embedded in all areas of children's lives across the world. As new technologies emerge at a rapid rate, it is crucial that we as global community enshrine and promote children's rights across all new and existing digital media. We hope the General Comment will clarify how children's rights will be affected in both positive and negative ways, as well as provide states, businesses, parents and children themselves the necessary direction and guidance to help children thrive in a digital age.

The right for children to access digital media as a way for them to freely express themselves, participate and have their voices heard, learn and take part in cultural life is paramount. Technology brings many benefits to children and young people for creativity, learning, connection, self-expression, support and advice. The internet provides an essential means for children to claim and fulfil their rights as set out in the United Nations Convention on the Rights of the Child (UNCRC).

While digital technology offers many opportunities, it can also expose children and young people to risks, and the right for children to be safe from harm must also be taken into account. Including of content, contact and conduct, such as, for example, exposure to pornography, grooming, bullying, sexting, sexual harassment and excessive use. The internet can also magnify peer pressure and create constant comparison that places unrealistic demands on young people, for example around body image and popularity. This can have a significant impact on young people's self-worth and self-esteem and the way young people build relationships.

Online safety is a complex issue, with technology changing rapidly and new apps and games being developed all the time. Children and young people are often at the forefront of this change, using and interacting with these new technologies before many adults do. It is important to ensure that any policy or intervention to protect and empower children online retains, and does not hinder, their access to the opportunities offered by technology.

We all have a responsibility to work collaboratively to promote children and young people's wellbeing online, and there is a key role for everyone to play, including industry, educators, policymakers, parents, carers and young people themselves. It is essential we address this on a global-wide level, with improved support and education for young people to promote their wellbeing, self-esteem and socio-emotional skills, as well as steps from industry to fulfil their duty to create an online environment that supports the wellbeing of children and young people.

We support the general structure for the General Comment on key groups of rights to be realised in a digital world namely; access to information and freedom of expression and thought; right to education and digital literacy; freedom of assembly; right to culture, leisure and play; protection of privacy, identity and data processing; and protection from violence, sexual exploitation and other harm, family environment, parenting and alternative care; health and wellbeing.

We recommend adding the **'Right to participation'** to really communicate clearly to States, businesses and others that children have the right to participate in policies, platforms or activities that affect them and they an experience to share. Our justification is further expanded upon in the next question. We also recommend clarifying children's right to recovery from trauma and reintegration (**Article 39**) in specific reference to online harms.

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 essential that we make children and young people agents in shaping policies and practices which affect their access to, and use of, digital technologies. Their right to 'participation' and be listened to as enshrined in **Article 12** is fundamental. We need to provide positive opportunities for young people to participate in order to help not only create a rights-based approach to digital safety and participation but so that children are fully aware of the rights that they have. They need opportunities to have their say and play their part in creating a better internet. Children are already active users of technology, and as well as providing a unique and current perspective, they can add a lot to these discussions.

We know, and [research supports this](#), that children are generally very positive about their online experiences, and relish the chance to be constructive digital citizens. At Childnet, we have an

extremely successful track record in meaningfully engaging children young people in digital issues and using this approach to influence policy outcomes. Through our work with thousands of young people across the UK, we know they have strong ideas and opinions on online safety and that they are able discuss these rationally, with compassion and a clear vision for a better internet. Here are some examples of how we have done this.

- 1. Robust and regular research with all children** is paramount to understand and formulating policy that takes into account their experience. Our [report into online sexual harassment](#) brought to the fore, the actual experiences of young people and the barriers they felt in reporting. Giving all young people the opportunity to talk about something that had been considered not important or taboo is essential to giving them the space to express themselves. Recent research over the last few years we have conducted for Safer Internet Day includes young people's experiences of [consent in an online context](#), including through our [Digital Leaders](#); [digital friendships](#) and how they want support from adults; [role and influence of image and video](#) in their lives and [online hate](#). We also host the [UK Council for Internet Safety Research Highlights](#), through our work in the UK Safer Internet Centre. It is essential that all groups of children are consulted, including those from marginalised groups (regarding gender, ethnicity, socio-economic status, special educational needs or disability or other demographic and vulnerability factors) to ensure that all young people are represented and considered when creating policy. The majority of research that has been undertaken has been in the global North than the global South and this is an area that must be considered and the efforts of initiatives such as [Global Kids Online](#) must be encouraged.
- 2. Through early, regular and meaningful interaction.** Project deSHAME, an EU project where we are lead partners, aimed at tackling online sexual harassment in UK, Denmark and Hungary has a Youth Advisory Board in each country. From the very beginning of the project, these young people (13-17 years old) have helped shape and develop research methodology, the educational resources for young people and guidance for school staff and law enforcement. This consultation through youth residentials and ongoing interaction has meant that young people have not just been asked for their opinion at the end of a project but consulted, allowed to make decisions and take ownership of the outcomes. They also led events in UK, Hungary, Denmark and Brussels where they engaged policymakers, industry and others in activities and workshops. This holistic approach is needed to ensure that children's involvement is not tokenistic.
- 3. Training and engaging young people to become ambassadors and spokespeople.** By training and supporting children to reach their potential, children in the Childnet Digital Leaders Programme (8-17 years) have been able to educate their peers, parents, teachers and engage in policy. This is a youth leadership training programme empowering young people to educate their peers about online safety. We have over 3000 trained and qualified Digital Leaders across the UK and have consulted them on consultations to government as well as on wider issues. We also know that they are active in inputting into their school policies in this area. They have also provided their thoughts and reflections and tips for other young people through qualitative research on emerging technology trends such as [livestreaming](#) and [voice assisted technology](#).
- 4. Using the power of technology to engage young people.** In order to allow children to freely express themselves, it is important to consider the medium in which they do so. Technology and the platforms and services children are using are a powerful tool to harness the potential of

children. For the last ten years we have run the Childnet Film Competition, where we ask young people to create a short film educating their peers about an online issue that they believe is important. Each year it has been amazing to not only to see the ways these films have been skilfully created, but also how they have then been used as impactful tools to educate young people around the UK about key online safety issues. As a 14 year old young winner said: “Our generation have the power to change our future through an art form, which has been around for over a hundred years, but only recently having the technology to make the magic ourselves.”

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

In order to address discrimination that takes place both offline and online a multi-pronged approach must be undertaken. All children should have equal rights to both access and the opportunities given by digital media as well as protection from potential harm.

Consult all young people and hear their vision of a better online world

Our work on online hate in 2016 revealed the scale of the issue affecting young people.

Overwhelmingly young people want the internet to be a positive and inclusive place that respects people’s differences and they see their peers helping to create this. The online study of over 1,500 13-18-year-olds found that 94% believe no one should be targeted with online hate, while 93% have seen their friends posting things online that are supportive, kind or positive about a certain group in the last year, for example, girls, LGBT people, disabled people, or those of a certain race or religion – with 47% doing this themselves. However more than four in five (82%) said they witnessed online hate, having seen or heard offensive, mean or threatening behaviour targeted at or about someone based on their race, religion, disability, gender, sexual orientation or transgender identity. It is imperative that businesses developing new technologies, States and other members of civil society consult and implement the needs of all children particularly in reference to gender, special educational needs and disability, refugees and asylum seekers, poverty, children in institutions (such as foster care or orphanages).

Preventative education

Our work at Childnet over 20 years has shown the importance of early preventative education to establish an online culture that is based on respect and celebrating difference. **Article 28**, that every child has the right to education and **Article 29** regarding what these goals are, must be relevant to children’s lives and reflect their needs to be safe and responsible digital citizens.

School communities are a key part of supporting children, and we have worked to support schools through, with support from the Government and the EU, providing guidance on preventing and responding to cyberbullying, and developing a toolkit for PSHE teaching on sexting, homophobic cyberbullying, peer pressure and self-esteem. As well as working directly with our target audiences in schools across the country, Childnet have developed a range of resources and programmes to support school communities; these target all age groups, including children with Special Educational Needs, as well as supporting teachers, parents, covering the range of issues young people face at different ages, discussing important issues around gender and peer pressure for example, and aimed at developing children’s knowledge and skills so they can be empowered to use new technologies safely and responsibly.

Young people need education to be supported to firstly be able to identify and recognise discrimination online and then feel empowered to be able to respond to it. For example, in our most recent impact report for Project deSHAME, as one young boy in Bristol said: “This is what kids our

age need, they need to learn about sexual harassment, online, offline, it doesn't matter. It's not really addressed well enough and it needs to be."

Empowering young people to claim their rights and empowering bystanders to take action

Awareness of their rights online is imperative so that children do not accept discrimination as the norm online. Many young people we have spoken to have communicated how they feel misogyny, homophobia or other forms of discrimination are just part of online life. This cannot be accepted. Our research in Project deSHAME shows that young people face significant barriers to reporting and taking action both as victims and as bystanders. This can also have an effect children self-censoring with nearly three quarters (74%) saying that online hate makes them more careful about what they share online.

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

The role of parents and other caregivers is important both in terms of protecting children but also as acting as positive role models in their lives. In reference to **Article 18, UNCRC**, parents or guardians of a child or young person should act in their best interest. This may change as a child or young person grows up, has changing abilities, wants and needs.

We have always looked to reach children early, when their relationship with technology is in formation to help establish positive behaviour, and the same can be applied to new parents, as they are receptive to information and their parenting approach is in formation.

It is essential that States and the internet industry support parents and caregivers in this area which is rapidly changing and maybe a landscape that they may not be familiar or comfortable with. Often the perception amongst adults is that the role of technology in children's lives is primarily a negative one. For example, wider discourse on necessary time limits on 'screen time' can sometimes have the negative impact of depriving children of their rights to pursue their interests in the digital world. We know from our work with children and young people that they are turning to the internet for advice and support, including from important online services. Accessing advice online can remove barriers that young people face when seeking help.

Parents should be supported and empowered to recognise the importance and positive role of technology in children's lives, and the importance of parental engagement and regular dialogue. They should also have access to practical guides to safety tools from ISPs, device manufacturers, social media providers and other online services (such as TV on Demand). This should be provided as they purchase new technology for their child rather than an additional 'add-on' after their child has already been engaging with the online world.

It is also important to recognise that children will engage with technology in their wider familial network (i.e. through Grandparents, aunts, uncles, family friends). Other caregiving structures must also be acknowledged, and those caregivers must be supported to support children with unique or differing needs. For example Childnet have already produced [guides for foster carers and adoptive parents](#), and working with adoption organisations, run training sessions for adopting parents.

Whilst parents and caregivers are vital for children to be safe, happy and healthy online, at Childnet we know that not all responsibility can be placed on them. They are to impart their life expertise and engage with their children in ongoing dialogue, whilst also setting boundaries and rules together as a family. An opportunity for parents and caregivers to role model positive behaviour can be a useful way to engage children.

It is alongside governments, industry, schools, charities, civil society and the wider children's workforce that we can help children to thrive online.

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

Businesses operating in the digital environment have a crucial role in enshrining children's rights and have a duty of care to their users. These can include, but is not exclusive of:

- ensure that any commercial interests do not override children's rights
- using opportunities when children (and caregivers) engage with their business online to educate their users;
- ensure safety tools, such as reporting and blocking, are robust, easy to use, transparent and give their users confidence
- recognise that children are likely to be using their platforms or services online, even if children are not the target audience
- ensure that children's right to privacy, and the protection of their reputation is enshrined

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

States have a crucial role and governments must make sure that children's rights are respected, **Article 4, UNCRC**. States must recognise the importance of the access to, and use of, digital media and their potential to promote children's rights such as their right to freedom of expression, access to appropriate information, participation, education, leisure, play, cultural life and the arts. They must also ensure that there is equal and safe access to the digital world for all children, including those who may be marginalised in society due to other forms of intersecting inequalities.

Both equality of access and the safe, healthy and happy use of the internet for children can be achieved through: education; children's participation; legislation and regulation of businesses using digital media; supporting parents/caregivers and wider community networks; cross-sectoral and government department working and responses; ensuring policy approaches are evidence-based; transnational working; awareness raising for children so that they know their rights; emphasis on digital literacy and citizenship from an early age; and child centred information online (health, education etc).

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

Yes as stated in the overview. We recommend that the General Comment sets out how the UNCRC can be implemented with reference to digital media. The report prepared for the [Children's Commissioner for England \(2017\) on the UNCRC General Comment on Children's Rights and Digital Media](#) has set out a structure as well as how the general principles can be understood and applied in the context of the digital world. It is essential that this is clearly defined as States need clear guidelines and understanding on how to interpret children's rights in a digital age. The UNCRC is a vitally important framework and we fully support a General Comment which will make it clear explicitly clear to States and other bodies that these universal rights extend into the digital environment.