The Civil Association for Equality and Justice (Asociación Civil por la Igualdad y la Justicia, or ACIJ) is a non-profit and non-partisan legal advocacy organization of Argentina. The basic principles guiding the work of ACIJ are to defend the fundamental rights of the most vulnerable groups in Argentine society while contributing to the strengthening of institutions in the public sector.

In this sense, and following the invitation made by the Committee to all interested stakeholders to comment on its draft General Comment on Children’s Rights in relation to the digital environment, please find below (marked in blue) the contributions that our organization would like to submit for your consideration.

Regards,

**Asociación Civil por la Igualdad y la Justicia.**

**D. Allocation of resources**

29. States should mobilize, allocate and utilize public resources up to its maximum availability, to fully implement legislation, policies and programmes to realize children’s rights in a digital environment and improve digital inclusion to reflect the increasing impact of the digital environment on children’s lives and to promote equality of access and affordability of services and connectivity. The Committee underlines that States parties have an obligation to show how the public budget-related measures they choose to take result in improvements in children’s rights. States parties shall show evidence of the outcomes obtained for children as a result of those measures.[[1]](#footnote-0)

**I. The business sector**

36. The business sector including business enterprises as well as not-for-profit organizations directly and indirectly impacts on children’s rights through their activities and operations in providing services and products related to the digital environment. States have obligations to ensure that the business sector meets its responsibilities for children’s rights in relation to the digital environment by taking all necessary measures including adoption of legislation and regulations, and the development, monitoring and enforcement of policy. In particular, States should prevent businesses from excluding the provision of services in informal settlements and rural areas due to profit-based reasons in order to guarantee access to connectivity to children living in living in vulnerable situations. Children are calling for businesses to better respect, protect and remedy their rights in relation to the digital environment.

**IX. Children with disabilities (art. 23)**

97. Barriers that children with disabilities face in the digital environment relate to insufficient access to assistive technologies at home, school, or in relation to culture, play and communication with peers or to lack of support to use these devices. Children with disabilities can also encounter policies that have a discriminatory impact on them, such as a ban on their use of digital phones in some settings, although children with disabilities may heavily rely on digital devices to communicate and access information. Further, many websites, applications, games and other digital services fail to meet universal design requirements to ensure accessibility.

98. States should ensure access to a wide range of affordable assistive technologies and to physical and virtual engagement where needed, in particular for children with disabilities living in poverty. States should provide guidance and resources to staff in schools and other relevant settings so that they have sufficient training to support children in utilizing appropriate digital technology and are able to rethink school dynamics and methodologies when the needs of children with disabilities are not being met. They should also ensure that technologies are designed for universal accessibility so that they can be used by all children without exception.

**XI. Education, leisure and cultural activities**

 **A.The right to education (arts. 28, 29)**

109. States should support educational and cultural institutions such as archives, libraries and museums to make available to children diverse digital and interactive learning resources, including disability-inclusive and indigenous resources and resources in the languages that children understand.

110. For children attending school, digital educational technologies can support engagement between teacher and student and among peer learners. For children not physically present in school or living in remote areas or in disadvantage or vulnerable situations, digital educational technologies can enable distance or mobile learning programmes. States should ensure and provide children that cannot attend classes in person at schools with access to connectivity resources (internet, computer, tablets, etc.) that allow them to receive education in a digital environment. Additionally, States must implement a plan, to the maximum of their available resources, to guarantee access (both inside and outside school) to said resources to every child physically attending classes, especially for those living in poverty or in vulnerable situations. States should ensure that schools have sufficient resources to provide parents with guidance on online home schooling and learning environments.

111. States should invest equitably in technological infrastructure in schools, ensuring the availability of sufficient number of computers, quality connectivity and electricity, the provision of supports for disadvantaged children, such as those with disabilities, to use such devices, teacher-training on the use of digital educational technologies, and timely maintenance of school technologies that are accessible to every child. States should support the creation and dissemination of diverse digital educational resources of good quality and ensure that existing inequality is not exacerbated by problems regarding access to such resources.

1. CRC/C/GC/19. para. 24. [↑](#footnote-ref-0)