# **Consultation on the CRC General Comment on children’s rights in relation to the digital environment**

#### Feedback from the Secretariat of the Lancet and Financial Times Commission on Governing Health Futures 2030: Growing up in a digital world. November 2020.

The *Lancet* and *Financial Times* Commission on Governing Health Futures 2030: Growing up in a digital world was established in October 2019 to explore the convergence of digital health, artificial intelligence and other frontier technologies with universal health coverage. The Commission has a special focus on ensuring that digital development improves the health and wellbeing of children and young people, maximises health equity and supports human rights. Towards the end of 2021, the Commission will deliver a set of recommendations on the governance of digital health.

The Secretariat of the Commission welcomes the Committee’s initiative to develop a General Comment on children’s rights in relation to the digital environment, and the opportunity to comment on this draft. The assessment of the opportunities and risks of digital transformation for children outlined in the draft fully aligns with the research that we have undertaken on behalf of the Commission. We welcome the clear recommendations to states throughout the General Comment which will greatly inform the Commission’s deliberations on effective governance of the digital transformation in health.

## Suggested additions to the draft

1. **Paragraph 2** – It would be helpful to clarify that the digital environment is based on digitisation of information and the generation of potentially limitless volumes of data.
2. **Paragraph 16** – The COVID-19 pandemic has highlighted the role of digital technologies for disease surveillance and also concerns that inappropriate application of such technologies, in the name of promoting the right to life and survival, can undermine other rights such as the right to privacy. Is the Committee able to offer any guidance to states on how to address this tension?
3. **Paragraph 31** – Suggested adding here that data should be disaggregated by age, gender and other relevant characteristics to highlight inequities in service coverage and outcomes, for example. It may also be worth reinforcing here the importance of anonymising and protecting children’s data.
4. **Paragraph 70** – “Digital technologies are used to collect data about…”. Suggest adding “physical and mental health status” to this list since health-related data is highly sought after by advertisers and other commercial interests.
5. **Paragraph 102** – Suggested adding that in addition to ensuring “access to trustworthy health information and services”, states should also invest in the digital health literacy of children and their caregivers so that they can distinguish reliable sources of health information from unreliable sources, and also from misinformation that may undermine confidence in health interventions.
6. **Paragraph 103** – Suggest adding that states should invest in connecting every health facility and health worker so that all children can benefit from digitally-enabled health services.
7. **Paragraph 121** – It might be worth specifying if the reference to child labour relates to child labour in the mining of metals for the production of digital devices?
8. **Section XIII** – An additional paragraph could be added that recognises the potential benefits of states sharing data in the public interest, for example of sharing health data to support research and development into tacking diseases or responding to a health emergency. Additional guidance to states would be helpful on the need for international cooperation to develop global governance mechanisms that support the sharing of data in the interest of children’s rights to health, etc, whilst protecting their right to privacy.
9. **Paragraph 129** – After “government authorities”, suggest adding “responsible for cross-cutting and sectoral digital transformation” or similar, to encourage dissemination of this General Comment among all government departments.

Thank you for the opportunity to comment on this draft General Comment. We look forward to its publication in 2021 and to reinforcing its recommendations through our work with the Governing Health Futures 2030 Commission.

If any of these points require further clarification, please contact Louise Holly, Policy and Research Consultant at: [louise.holly@graduateinstitute.ch](mailto:louise.holly@graduateinstitute.ch)