**Comment on the Concept note for a General Comment on children’s rights in relation to the digital environment**

**By the European Council for Digital Good**

In the following document, the 15 permanent members of the European Council for Digital Good (EuCDG), aged between 13 and 21 years, put forward their views on some of the important rights children should be able to enjoy all over the world, how digital technology impacts these rights, and what could be done to better protect children in today’s media landscape. These ideas draw on a 2018 consultation involving young people from 35 countries to define and rank the biggest challenges they encounter in the digital world. These challenges constitute the EuCDG’s *2020 Agenda for a Smarter Internet for Kids* (see Figure 1, also available at <https://smarterinternet.org/wp-content/uploads/2019/02/have-you-say.png>). Specific goals, targets and means to respond to the challenges were developed with 30 or so Italian youth at Safer Internet Day celebration events in Milan in February 2019. These challenges on the EuCDG’s 2020 agenda are intrinsically linked to children’s rights defined in the UN Convention on the Rights of the Child.

Figure 1: 2020 Smarter Internet Agenda

***Right to access information:*** The internet has made our access to information a lot easier. In the past it was difficult - sometimes even impossible – for everyone to have access to information, as many people could not afford to buy books; but today, with just a few clicks, a vast world of information is offered to us from sources that would not have been accessible so easily some years ago: from valuable knowledge we can use at school, to online museums we can virtually visit.

Nevertheless, as anybody can write anything online, the digital environment allows also for misinformation. We can receive a lot of fake news in today’s society. We are surrounded by information, and people are free to have their opinion on every situation; and that is good most of the time, because we can learn from others to help us shape our own opinion. But sometimes people may lie, exaggerate and use clickbait to attract people for their own purpose or profit.

And not only children, but also adults can be tricked by websites, which seem to provide information, yet their goal is advertisement or even (unethical) marketing. Hidden ads cannot easily be recognized by children, who don’t have the skills and the critical thinking to distinguish which is real / reliable information and which is not. Thus, the right to information can be easily hampered.

To prevent fake news, children should have the right to be protected from lies. Online platforms should have an obligation to avoid posting unreliable information online; on the other hand, we as children should have the right to be taught from young age not to take the veracity of information for granted.

***Right to freedom of assembly:*** Children of today are the first generation born in a technological society, in which social media is an integral aspect of their daily lives. Social media enables all users, regardless of age, country, education, or social class to express themselves freely and have an impact in the global context. With these platforms children can be instantly informed about the world news, which trigger them to form their own views and strive for a better future as adults. In other words, the internet and especially social media, provides children the opportunity to gather and communicate online, contributing to the creation of universal citizens who can come together in the online worlds, meet people, and form groups where they can share common interests, experiences and uncensored viewpoints.

Unfortunately, there is also the other side of the coin: as the internet is open to anyone, it can also enable people to incite fanatical convictions and spread misinformation or fake news which can harm children’s vulnerable personalities; the internet can be used to promote extremist or other harmful ideas and actions, which are sometimes embraced by children. In addition, social media allows the creation of fake profiles and identity theft with, many times, the aim to send cyberbullying, threatening, or hate speech messages to children, with potentially severe consequences for the victims. Last but not least, a contemporary phenomenon is the manipulation of social media by arbitrary governments using methods such as propaganda, media shutdown and censorship, depriving both adults and children of the rights of assembly and free expression. And, one should not forget the issues of privacy and protection of personal data, which can be easily abused online.

Every child should therefore have the right to become digitally literate, and it is vital that governments provide for the development of digital literacy in schools from a very early age. Teachers should know how to encourage children to strongly support their beliefs, to respect each other online as well as offline, and to learn how to distinguish real from fake information, and parents should be encouraged to take part in this learning process.

***Right to protection of privacy and identity:*** It was much easier to safeguard the children’s right to privacy before the digital environments emerged. Now, children have no privacy at all, since their lives are constantly being broadcast online. They may be giving away their personal data themselves, but it is also their relatives and friends that do it. If teenagers want a social life nowadays, if they want to be able to be ‘updated’ with what their friends or classmates are doing, they need to be online, sacrificing a big part of their privacy. It is vital to update and to find new ways to safeguard the right to privacy, so that it fits the specificities of the online world.

***Right to freedom of expression and thought***: The freedom of expression and thought is a fundamental right in every democracy in the world. As the UN Convention on the Rights of the Child states, children have the right to get and to share information (Article 13) and to think and believe what they want (Article 14). However, the digital environment raises a few issues regarding the implementation of these two rights. Social media provide a level of exposure that seems overwhelming at best and daunting at worse for many youngsters. This causes children to fear stating their opinion online, and has given rise to the existence of internet trolls who crave to insult others, making things even more frightening. What we should try to do is to educate children, so that by the time they reach an age to be allowed to enter the social media world, they are able to express their thoughts and have a respectful behaviour towards different opinions. This can be achieved through the educational system, by engaging students in dialogue and by guiding them in their first steps in the digital world. Children, who, by the time they own an online account, have adopted a civilized code of conduct, will neither hesitate to state their opinion for fear of criticism, nor will they disregard or insult the thoughts of others.

***Right to a family environment, parenting and care:*** With the new digital world we live in, we need to rethink how actions of parents can affect the rights of the child. For example, how parents are constantly breaking Article 16 - Right to privacy, by sharing online sensitive personal information about their children without their consent. It can be argued that such actions can even be considered a form of neglect, since most often they are not done maliciously but by parents who are not aware of the repercussions of their actions online. So, it is highly important to educate the families in a new parenting and caring style, which is absolutely crucial if we want to live in harmony with the digital worlds.

***Right to be protected from violence, sexual exploitation and other harm:***

1. *The issue of sexual harassment:* the internet has given perpetrators the possibility to easily approach (vulnerable) children, even within their own home and bedroom (the phenomenon of grooming). In our opinion, the digital world has impacted on this right of children’s protection from sexual exploitation and other harm from three different perspectives: a) *The social media platforms:* Fake profiles are countless and there is no effective measure to minimize them. Social media platforms haven't raised enough awareness concerning the way children can report any kind of abuse. B) *The abuser:* The anonymity of the internet has made it really easy for abusers to harass children in any way they want, and to get away with it. Abusers have countless options of creating a new profile (just by using a new email address) if their previous account is blocked, which only worsens problem. C) *The victim:* Children don't report any kind of abuse they face online, and so make platform providers aware of the threat they have been dealing with. Children feel afraid and embarrassed when they are abused, so they don't address their parents, teachers, or any trusted adult in their environment to talk about the problem.

The digital environment has also given birth to the so-called ‘sexting’ via mobile phones, a practice widely used by adolescents – sometimes after being pressured by peers –, without thinking about the issues of privacy or the potential consequences (such as cyberbullying) before sending sexually explicit messages or pictures over the net, or where these may end up. It is vital to safeguard this specific right by raising children’s awareness from very young age, within the school and the family.

1. *The issue of child pornography:* the digital environment has unfortunately given the opportunity for child offenders to use the medium in order to sexually abuse children. Indeed, child pornography is a continuously growing problem in the online world. It is a violation against Articles 34 and 36 of the UN charter of the Rights of the Child. One of the problems is that the perpetrators and the people who are uploading child pornographic material can disguise themselves, so it is hard to track them. On the internet everything can be spread rapidly and before a video or a picture is taken down – if it has been reported! – thousands of people could have seen that picture or video.

The fact that child pornography is not reported is another big problem, allowing in this way child porn to stay online and be viewed by more and more people. The consequences for the children appearing on pornographic material can be devastating and can mark the rest of their lives, not to mention that, on top of that, these children can face bullying online and offline.

If people would report child porn as soon as possible, it could help to combat the problem and protect the children. But it is also very important that we talk more openly about child pornography, in order for children to become aware of it from early age and to learn to immediately tell someone they trust, if they are approached by a stranger on or offline. People will then not be ashamed to report it and to talk about it. If we break down the wall of shame, we can do more about it.

1. *The issue of inciting to harm:* this has become a huge topic in the digital environment, but why do we face it so often? Because the digital world is not yet able to effectively deal with it, we do not have enough possibilities to fight against it. The human right to protection should guarantee that this should not happen to people, yet still this is a huge problem. Actually, the digital world has impacted a lot on UNCRC rights and it has made it very difficult to protect them, because it is so huge that you cannot really have an overview on it. This leads to modern societal problems which are even increasing day-by-day. The anonymity of the digital world facilitates harm. Hurtful online comments and incitement to regrettable actions can lead to serious problems such as traumatization throughout a person’s whole life, and it can even lead to terrorism. This should not be possible in a world which actually wants to protect people.

What can be done against this? Internet providers should supervise their systems and immediately take down material which incites to harm. Furthermore, we need people who are trained to help victims, but also who can create awareness towards prevention and towards dealing with such issues if and when they arise. Schools can play an essential role in this, because school-age children are a high risk group when it comes to incitement to harm.

1. *The issue of cyberbullying*: cyberbullying has a major impact not only on the right of being protected from harm, but also on limiting possibilities for children to meet and participate with other children and young people (Article 15). When bullied, children are unable to join groups and organizations since they feel that the society has rejected them. Cyberbullying also relates to Article 13, as the children can freely share information about other children online, which can be damaging to others.
2. *The issue of cybercrime*: unfortunately there are many types of cybercrime: ID theft, catfishing, scams, cyberterrorism, financial fraud, or online harassment are just a few the online world has to face. The internet users – including the children – must be aware of the potential dangers, in order to protect themselves from them. Up to a point it is in the users’ hands to take care of their online safety, but the internet providers’ duty is to make sure that their services are free from fraud, and to provide immediate help, whenever necessary. This is where cybersecurity comes in: protection from any potential danger online, should be considered a basic human right. In our Council we believe that, since children nowadays are involved in the online worlds from very young age, knowing all the dangers from early childhood will provide them a protection shield, and empower them to immediately seek for help, whenever necessary. Both the family and the school environment have to play their role in safeguarding the children’s right to be protected online from any harmful, offensive or illegal content and activities, and in combating cybercrime.

***Right to health and online wellbeing:*** Health and online wellbeing are two extremely crucial topics regarding the rights of the child; actually, there are essential mental and physical needs and problems surrounding children and young adults when using the internet. These mental and physical problems (e.g. anorexia, bulimia, online excessive use / ‘addition’) are very closely connected to the internet and ought to be dealt with and discussed more. There are many websites which promote and boost the aforementioned problems, and thus the UN might create a right: “*The child and its parents can ban and block websites which threaten the healthy growth and wellbeing of a child.* “ There would, of course, have to be a feature which would provide this option for children and parents. Internet service providers should offer their cooperation when banning such websites. This might help to tremendously reduce the annual amount of victims of these health issues. Other possible actions might be creating more programs which would analyze big data and hashtags on social media regarding this topic, creating more international help lines and websites for children or developing annual anonymous surveys for children to fill out, for better analysis of this type of data. Support to organizations running these programs is essential.

***Right to education and digital literacy:*** The UN Convention on the Rights of the Child states that ‘*Children have the right to education and school discipline should respect children’s human dignity.*’ In a world which is rapidly becoming extremely digitally-based, most educational systems are incorporating more digital resources into their curriculum. For this reason digital civility has now become an imperative subject and should be instilled within the school curriculum, so that the school can ensure that children are receiving the benefits of a digitalized education and not drowning in a digital sea of chaos. Implicit to human dignity are human values and the notion that each human is worthy of respect. Honouring children's rights to an education that fulfils their needs can only be reached if it is accepted that digital technologies are an integral part of children's lives. It is the duty of governments to provide for an education that will equip every child with skills for the digital era. The Convention also states that ‘*Primary education should be free*’, which indeed it should. However, in light of the above it is now necessary for children to be provided with free access to digital educational resources and this should be government-funded. We call upon high income countries to consider involving digital education in their development cooperation as a horizontal priority present in all their programmes in low income countries.

***How should the practices of businesses operating in the digital environment support the realisation of children's rights?*** Children must be able to reach out for help and receive it immediately. Governments should be obliged to provide help facilities, not only through social networks but also have real life help centres which children can address to receive help. Businesses operating in the digital environment should promote and enforce these facilities, in order for children to feel comfortable in reporting any problem they may come upon, or any abuse of their rights. When children are comfortable enough to report and reach out for help in the digital environment, they will become accustomed to carrying out these practices in their everyday environment, online and offline. What we aim to achieve is for children to feel safe and unharmed in their digital environment. We want them to have someone to rely on, to ask help from, in order for them to avoid any disturbing situations they may come across.

And, on top of that, businesses should put the protection of the rights of the child above the goal for profit. If children feel secure and protected in the digital world, the online world will benefit much more!!

**About the European Council for Digital Good (EuCDG)**

This youth-led council, initiated by the Luxembourg-based educational organisation Insight in 2016 ([www.insight2act.net)](http://www.insight2act.net)), aims to empower young people in Europe and beyond to express their opinion on how we can, all together, create a better, safer and healthier internet, and how we can become proactive digital citizens. The 15 permanent members of the EuCDG, aged between 13 and 21 years, conduct workshops and consult peers in their own country and national language, and share information and ideas gathered at regular online and twice yearly face-to-face meetings to implement ideas and actions. They reach out to decision-makers and educators, participate in public discussions and generally do all they can to use digital technology as a lever of opportunity and ensure that young people all over the world can learn, engage and participate freely and respectfully online. EuCDG members come from Croatia, Cyprus, France, Germany, Greece, Iceland and Slovakia (<https://www.facebook.com/CDGEurope/>). Their work has been supported among others by the Council of Europe, Microsoft, Google and Facebook, and the EuCDG is an official contributor to the Child Dignity Alliance set up by the Pontifical College of the Vatican in 2017.

**Names of contributors to this document, in alphabetical order**

Evelina Adamou, Katrín Lilja Árnadóttir, Philippine Balmadier, Magdalena Cvetić, Peter Alexander Dubček, Danae Finiri, Eric Hohenadel, Hafrún Arna Jóhannsdóttir, Amanda Leigh Mazić, Christos Mesogeitis, Elisavet Papasimakopoulou, Dimitrios Platis, Nike Samara (Council members); in collaboration with Janice Richardson and Veronica Samara (Insight), and national mentors Andrea Cox, Nectaria Hadjisergi, Dunja Mijović, Sigurður Sigurðsson