**In the name of God, the Most Compassionate, the Most Merciful**

**Comments by the Islamic Republic of Iran pursuant to the call of CRC aiming at drafting a General Comment on children’s rights in relation to the digital environment**

The Islamic Republic of Iran welcomes the call by CRC to comment on the "concept note of General Comment on children’s rights in relation to the digital environment" and presents its own comments about it. The observations of the Islamic Republic of Iran reflects its preliminary comments and does not include all its considerations. The Islamic Republic of Iran requests the CRC to provide the opportunity for further considerations of State Parties in the GCs final draft.

Please find our comments below:

**1. Introduction**

Children are one of the main internet users all over the world. They go online in order to have access to information, contact their family and friends, do their homework assignments and download music and games. Today, children spend a noticeable part of their free time using the internet and the digital technologies. However, both the threats and the opportunities of the digital world should be taken into consideration. Although the digital world has numerous advantages, as parents deal with it, it is not totally safe and potential dangers for children could be seen in it, therefore, smart measures need to be taken in this regard. This important issue is being dealt with in many countries.The National focal point of the Convention on the Rights of the Child prepared the following text in cooperation with the governmental and non-governmental organizations responsible for the rights of the child in Iran.

**2. Access to information and freedom of expression and thought**

While providing children with access to digital environment to ensure their enjoyment of access to information, freedom of expression and thought, it’s essential to monitor the content provided to users through the Internet, especially to children, and in fact making the space of production and exchange of information secure. In this respect, there are some considerations to be taken into account:

* Leading and motivating children and adolescents in order to help them be in a secure environment and avoid harmful environments, along with continuous responding to the cases concerning them;
* Encouraging the Internet industry to legality and filtering out techniques of illegal users;
* Considering penalties for content providers who provide "inappropriate contents for children" and make it available online;
* Empowering users and adults who are responsible for raising public awareness about existing technologies and practices of protecting children in the cyberspace by the government and the private sector, regulating Internet service providers, refining or blocking inappropriate content for minors, and developing age classification systems and content identification;
* Including content and service classification based on psychological differences, age, gender, physical and mental differences, and the interests of each user;
* Providing content and services in the form of one-way service groups;
* Creating and managing interaction, tailored to the features of the private and the public internet environment;

**3. Right to education and digital literacy**

Citizens of all societies have civil, political, economic, social and cultural rights, ignoring any of which can cause irreparable harms to individuals and society, especially vulnerable groups, including children. Effective child education is one of the tasks of the governments that must be considered with a child-friendly approach with due attention to children's age, individuality, personality and their psychological needs. Meanwhile, providing digital literacy to citizens, especially to children, by teaching them with a critical approach in communication/ media studies aimed at raising their understanding and deepening their knowledge, is of particular importance. Regarding children's access to the content and information in the cyberspace, and in order to avoid any probable harm, the following are suggested:

* Providing and producing child-specific search engines and contents;
* Using softwares specialized for parents’ and teachers’ monitoring on the performance of children;
* Limiting the children’s activities in digital space;
* Promoting the level of cyber education, and teaching “digital citizenship education program” at schools as a mandatory task;
* Supporting the general information on cyberspace;
* Simplifying the terms and conditions of using digital software for children;
* Designating observers to assort content provided by media companies;
* Protecting children from all forms of sexual abuse and exploitation and taking appropriate national bilateral measures to prevent encouraging or forcing children to engage in any illegal sexual activity and avoid the exploitation of children in immoral acts by all the countries;
* The requirement for all government departments, in particular the Ministry of Education, to set up child and adolescent systems in line with the mission of the related department and providing child and adolescent services and content (including homework assignments, social networking, etc.) in protected cyberspace.

**4. Right to culture, leisure and play**

Children and adolescents have the right to take time for innovation, artistic and cultural creativity, playing and doing safe and fruitful games. Learning and playing should not be limited to cyberspace and should be followed in real space as well. It is necessary for all parents not only to supply their children needs by providing them with the opportunity to play games, but also participate in their games and activities. On the other hand, the low level of emotional expression in families and preventing children to do games and entertainments, plays a significant role in juvenile tendency towards delinquency. Sincere communication, family-friendly relationships, family stability, as well as helping family empathy and avoiding conflicts between parents, make children and young people less likely to commit criminal activities. In this regard, the following recommendations are proposed:

* Selecting the game based on the gender, age and personality of the children and checking the label to choose the game based on their physical and intellectual situation as well as their personality and character;
* Considering the empowering of team work, humanitarianism, and social skills in computer games;
* Planning children’s recreational and leisure activities in order to prevent them from spending too much time on computer games.

**5. Protection of privacy, identity and data processing**

Children and teenagers have the right to enjoy their own private space based on their age. Parents are not allowed to take away this right unless it is absolutely necessary and in line with the best interests of the child. As minors are more vulnerable, it is necessary to properly educate and warn children to prevent any possible abuse. These warnings include a wide variety of issues, like educating children to protect their identity on cyberspace and making them aware that online data lasts long, and educating parents how to control their children. Parent’s role in protecting the security and privacy of children in the social media is undeniable. For example, parents cannot take necessary measures unless they are aware that the game machines they have provided to their children, is capable of being connected to internet and the child may join online groups. Threats to children’s privacy vary from county to county and it depends on the country’s situation, cultural criteria and physical conditions like the rate of access to internet. Since most children have social media presence, it’s crucial to provide both children and parents with proper training and awareness about the existing threats as well as the guidelines to correctly use this device and also about negative impacts of extreme use of available services. Moreover, parents, as the main role model of children, will learn more about the threats and principles of security and privacy in cyberspace through teaching their own children; this results in a well-informed society.

**6. Protection from violence, sexual exploitation and other harm**

The children and adolescents have a right to enjoy legal protection as well as their family’s support in order to counter violence and sexual abuse in real world and cyber space. More importantly, a child-friendly space in the internet should be available to them. While discussing violence against children, a red face and bruises on the body comes to mind; however, parents might abuse and exploit children for internet fame and making money online. In order to prevent online exploiting children, the following measures are recommended:

* Adopting laws and regulations, and defining the means to ensure compliance and enforcement;
* Creating domestic strategies and techniques to protect children online;
* Emphasizing the role of religious leaders;
* Training parents, children’s legal guardians and people who deal with them;
* Employing monitoring systems to be used by parents and legal guardians;
* Making a list of users who have a record of child abuse and following their online tracks;
* Planning some school courses for children to teach them how to protect themselves in the cyber space;
* Identifying children who are at risk, providing them psychological and social services;
* Launching a hotline for online crimes against children, responding to the complaints as quickly as possible. so the authorities could effectively prevent crimes, follow the criminals and support the victims.

**7. Family environment, parenting and alternative care**

Governments must make any efforts to solidify the family basis in real and virtual space. Children and adolescents in cyberspace have the right to benefit from the support and care of their parents and educators, so that they can have a useful, safe and secure use of the cyberspace. In general, important and practical recommendations for parents can be put in place through caring, managing, controlling and monitoring. Therefore, in dealing with the cyberspace-related phenomena in the family, they can avoid potential risks of abuse of children while taking advantage of the undeniable benefits of the digital environment. In this respect, it is recommended to:

* Avoid putting computers in the adolescent's bedroom and placing them in more public places;
* Set some rules in the family and with agreement of the child, before they start playing the game with the computer or using the Internet;
* Create a time limit for using computers for children;
* Choosing the type of computer games and the Internet program appropriate for the age of children;
* Manage mass media and communication equipments in the whole family and do not make it unique for the children;
* Make awareness, vigilance and empowerment of parents and educators to best serve the leadership, supporting and caring role;
* Provide parental monitoring and control on the activities of children through the use of cyber literacy and digital and software methods.
* Providing parental control over the activities of their children through the use of cyberspace knowledge and their preparation to enter into the public Internet;
* Enabling or disabling all or some of the services for underage and adolescent users with the request of parents in the form of white list, and consequently, turn it into a gray list and blacklist; also scheduling and monitoring the websites visited and the content observed by the children.