



Paradigm Initiative’s Response to the Call for Input on the Solutions to Promote Digital Education for Young People and to Ensure their Protection from Online Threats

Paradigm Initiative (PIN) works to connect underserved young Africans with digital opportunities and ensures the protection of their rights. Across our regional offices in Kenya, Nigeria, Senegal, Zambia, Zimbabwe and Cameroon, PIN works to connect under-served African youth with improved livelihoods through digital inclusion and digital rights programs. PIN advocates for the promotion and respect of digital rights and inclusion to ensure an enabling environment for human rights. Given this mandate, PIN submits below in response to the guiding questions on solutions to promote digital education for young people and to ensure their protection from online threats.

- 1. What are the main challenges young people in your country face in accessing digital education? Please consider the specific situation of marginalised young people and those in vulnerable situations in your response.*

The United Nations Scientific and Cultural Organisation (UNESCO) notes¹ that 89% of learners in Sub-Saharan Africa do not have household computers, and 82% lack Internet access. This limits access to digital education for children of school-going age. In Namibia, the Londa Report² documents that 80% of rural areas enjoy coverage compared to 95% in urban areas. At least 40% of people had access to a household computer or laptop, with 26% owning one and 15% relying on a device collectively owned by the household.

In Zimbabwe, out of the 10 522 schools nationwide, 76% do not have access to the internet, while 36% of schools have no electricity.³ UNICEF data⁴ on the Education Management Information System (EMIS), 2022 highlights that 141 177 learners with

¹ <https://www.unesco.org/en/articles/startling-digital-divides-distance-learning-emerge>

² <https://paradigmhq.org/wp-content/uploads/2023/04/Londa-2022.pdf>

³ <https://www.unicef.org/zimbabwe/stories/re-imagining-education-zimbabwe-collaborative-effort>

⁴ UNICEF (2024) <https://www.unicef.org/zimbabwe/stories/zimbabwe-dream-school-inclusive-education-power-assistive-devices#:~:text=According%20to%20the%20Education%20Management,who%20have%20access%20to%20education>. (Accessed on 31 January 2024)

disabilities, constituting only 10% of children with disabilities in Zimbabwe have access to education. This means that 90% of learners with disabilities do not have access to education for several reasons, including a lack of assistive technologies. This failure to address the digital inclusion of children with disabilities affects their access to education.

In March 2023, Econet, one of the major telecommunications companies in Zimbabwe, had their data rates pegged at ZW\$19,000 (US\$20) to buy 8 gigabytes (GB) of data valid for 30 days, for limited use. The NetOne data bundle cost \$16 000 (US\$17) for 10 gigabytes in March 2023.⁵ Zimbabwe's Median Country Internet speeds on mobile broadband, released by Ookla's Speedtest Global Index⁶ in November, show that the average download speed is 32.41 Megabits per second (Mbps), a rise from 10.88 Mbps. In 2022, the upload speed was 14.95 Mbps, a rise from 6.06 Mbps. To handle meaningful online activity, fast download speeds should reach at least 100Mbps, and upload speeds should be at least 10Mbps. The impact of the high data costs on access to education in the digital age is dire, resulting in the exclusion of children in underserved and low-income earning communities.

The following aspects below are the main causes of the exclusionary impacts on young people in Africa:

- a. Inadequate infrastructure that supports the deployment of digital education.
- b. Lack of digital skills that will enable effective use of digital education platforms
- c. Selective nature of the implementation of government digital education policies, like prioritising urban areas over rural areas while deploying digital education programs and platforms by the government.
- d. The profit-oriented nature of most digital education platforms run by private organisations tends to exclude youth from low-income families. This demography has the majority of youth in it.
- e. Fear of inadequate data and privacy protection also deter young people from accessing digital education platforms and programs.
- f. The non-inclusive nature of digital education programs and platforms, which most times do not consider the needs of people with disabilities.

⁵ Reserve Bank of Zimbabwe (2023) https://www.rbz.co.zw/documents/Exchange_Rates/2023/March/RATES_31_MARCH_2023-INTERBANK_RATE.pdf (Accessed on 17 December 2023)

⁶ Speedtest Global Index (2023) <https://www.speedtest.net/global-index/zimbabwe#fixed> (Accessed on 14 January 2024).

2. *What steps is the Government taking to ensure that digital education is accessible and promoted among young people? Please provide examples of specific laws and regulations, measures, policies, and programmes directed at ensuring young people's universal access to digital education.*

In Nigeria, a lot has been done by the government and private sector to ensure that digital education is accessible to young people. The National Policy on Education (FMoE, 2013) and the National Information Communication Technology (ICT) Policy recommend using ICT skills as a tool for learning. Nigeria's 2015 Policy on Education for All prescribes the use of communication technology for open and distance learning and recommends the establishment of open and distance learning with a focus on higher education and teacher education (UNESCO, 2000). Although guidelines and policies encourage the acquisition of computer knowledge and skills for software development, internet and digital broadcasting (FMCT, 2012), they do not recommend its use in e-learning. For example, the 2019 National Policy on Information and Communication Technologies in Education only proposes e-learning for migrant communities and adult learners (FMoE, 2019).

On the other hand, the 2019 National Implementation Guidelines for ICT in Education highlight the use of open educational resources to improve access to digital education and strengthen and expand open and distance learning. Major government efforts to ensure access to digital education by young people were seen during the COVID-19 pandemic, where we saw the federal and some state governments deploying various means like radio, television and some e-learning platforms to reach young people who were out of school during the period. We have seen an improvement in the mode and platform deployed for digital education by government and non-state actors, building on the lessons and success of those platforms deployed during COVID-19. In Zimbabwe, the government launched a National e-Learning Strategy for Schools in 2021 to ensure that schools in remote areas get access to e-learning equipment. However, despite such initiatives, access to e-learning resources remains elusive.

3. *What steps is the Government taking to ensure that young people can realise their human rights online in a safe, empowering, and inclusive way?*

Countries such as Nigeria, Zimbabwe and Kenya have enacted data protection laws, a progress step in ensuring personal privacy is safeguarded. This being the case, cyberbullying threatens the ability of children to enjoy learning in a safe space online. In 2020, a non-governmental organisation, Childline and the Postal and Telecommunications Regulatory Authority (POTRAZ)⁷ launched the *Child Online Safety*

⁷ Child Online Safety Guidelines <https://www.techzim.co.zw/2020/11/full-text-potraz-dir-generals-speech-at-the-launch-of-child-online-safety-protection-guidelines/>

Guidelines, which are not easily accessible on the POTRAZ website for educators and parents to implement the safeguards required for a safe online environment. The guidelines were passed before the United Nations General Comment No. 25 (2021) on children's rights in relation to the digital environment⁸ was adopted, and as such, there is a need for the government of Zimbabwe and other governments that have similar unaligned policies to revise them and ensure they meet the requisite needs to protect children's privacy online. The government of Zimbabwe enacted the *Cyber and Data Protection Act 2021 (CDPA)*⁹, which, in sections 165A and 165B, outlines the offences against children and criminalises the use of information and communication technology to the public, exhibit through electronic means child sexual abuse material and any act that exposes children to pornography. The CDPA is a progressive step, and the *Child Online Safety Guidelines* must also be aligned to strengthen the safeguards for children online. Raising awareness of the CDPA is a gap that needs to be addressed by the government to ensure educators and parents are aware of their role in safeguarding children

- 4. What are the main gaps and challenges to young people's protection from online threats in law, policy, and practice in your country and the impacts on young people's human rights? Please consider the specific situation of marginalised young people and those in vulnerable situations in your response.*

In practice, on social media, the lack of secure-by-design and threat-detecting algorithms that guard against or detect cyberbullying/ harassment and trolls is one of the challenges that harms children's enjoyment of human rights online. Furthermore, limited language capabilities on social media also harm children's rights online as global minority languages are not built into the design of social media language, thus allowing perpetrators of harmful content to commit crimes undetected. Online sharenting¹⁰ may threaten children's privacy immediately or in the long term. Yet, it remains disregarded in the design of national laws, while online gaming sites are often a haven for online predators who lure children into sexual exploitation.

⁸ General Comment No. 25 (2021) on children's rights in relation to the digital environment <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

⁹ Postal and Telecommunications Regulatory Authority of Zimbabwe (2021) <https://www.potraz.gov.zw/wp-content/uploads/2022/02/Data-Protection-Act-5-of-2021.pdf>

¹⁰ Kaspersky (2023) <https://www.kaspersky.com/resource-center/threats/children-photos-and-online-safety>

For example, in 2019, the popular Momo Challenge posed suicide and cyberbullying risks to children globally, leading to countries such as South Africa putting out statements¹¹ to alert parents of such a threat to the lives of their children. African governments need to ensure that they require internet intermediaries to ensure that in the process of moderating or filtering online content, they mainstream human rights safeguards into their processes, adopt mitigation strategies to address all restrictions on freedom of expression and access to information online, ensure transparency on all requests for removal of content, incorporate appeal mechanisms, and offer effective remedies where rights violations occur.¹²

5. *What steps is the Government taking to protect young people from online threats? Please provide examples of specific laws and regulations, measures, policies, and programmes.*

The Government of Zimbabwe is a State party to the United Convention on the Rights of the Child (UNCRC), the United Nations Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography OPSC) and the African Charter on the Rights and Welfare of the Child (ACRWC). At the national level, Zimbabwe's section 81 of the Constitution provides for children's rights. While Zimbabwe has a Children's Act Chapter 5: 06, this Act has not moved in time with the digital age and cannot offer redress for online harm. In addition to these laws, realising that some of the laws do not directly address activities that occur online, in 2019, Zimbabwe signed the WeProtect Statement of Action¹³ at the Global Summit to Tackle Online Child Sexual Exploitation. The Ministry of Information Communication Technology, Postal and Courier Services launched a taskforce for child online protection known as the Zimbabwean Child Online Protection Taskforce (ZICOP) in 2020. The government of Zimbabwe enacted the CDPA and has the *Child Online Safety Guidelines*, which need to be revised and publicised within the relevant education institutions.

For any further comments, PIN is reachable via an email submitted to Thobekile Matimbe, Senior Manager Partnerships and Engagements at thobekile.matimbe@paradigmhq.org .

¹¹ Government of South Africa -Film and Publication Board (2019) <https://www.gov.za/news/media-statements/film-and-publication-board-sends-warning-%E2%80%9Cmomo-challenge%E2%80%9D-game-28-feb-2019>

¹² ACHPR Declaration of Principles on freedom of Expression and Access to Information Principle 39(3) <https://achpr.au.int/en/node/902>

¹³ ReliefWeb (2019) <https://reliefweb.int/report/world/communiqu-global-summit-tackle-online-child-sexual-exploitation>