

Comments for
Draft General Comment No. 25: Children's rights in relation to the digital environment
Japan Committee for UNICEF
based on the views expressed by children in Japan

Japan Committee for UNICEF, with the support from the Social Media Association¹, organized a series of children's workshops called "Smartphone Summit" at 5 locations in different parts of Japan² and an online dialogue with business sector, between October 2019 and March 2020. In total about 180 children (secondary school students) participated and discussed the risks and opportunities of digital environment, covering such topics including excessive screen time, harmful contact, cyberbullying, and credibility of the digital world. The workshops were supported by a group of university students, who facilitated the discussion. Part of the process was joined by adults, where their role remained as participants, not as resource persons.

Children came up with a long list of suggestions for the government, business, schools, and parents in making the digital world safer and more child-friendly, as well as their commitment, which have been put together and categorized by the Japan Committee for UNICEF, for submission as inputs to the draft General Comment No. 25. Recommendations are added based on the suggestions from children.

1. Listen to us and give us opportunities for dialogue

"Listen to children's voices." "Provide opportunities where we can exchange ideas with other children and adults, like the Smartphone Summit." "We want more opportunities where we can physically get together and make suggestions, not only through online platforms."

Recommendation:

The fact that children shared various suggestions at the Smartphone Summit, on digital policies, programmes as well as design and services, strongly support the importance of engaging children, as in para 19.

Many children who participated in the workshops appreciated the experiences of exchanging ideas and making suggestions for stakeholders, and suggested providing similar opportunities. While the digital environment does provide opportunities for children to share their voices (para 18), the importance of offline discussions should also be highlighted, particularly in the form of constructive dialogue, not just 'adults

¹ An association promoting a safer digital environment for children, led by Kazuo Takeuchi, Associate Professor, University of Hyogo.

² Kurume, Kumamoto, Tsukuba, Tsu and Kobe.

consulting children’.

The role of youth, who speak the same language and share digital experiences with children, could also be stressed, as we witnessed the university students who played crucial roles in facilitating children actively expressing their views at our workshops.

2. Be deliberate when introducing younger children to the digital environment

To parents: “You should not give smartphones to children before entering primary school.” “When allowing younger children to use the smartphones or other devices, always be with them.” “Do not buy children smartphones until you think it is absolutely necessary for them.”

To governments: “Make legislation or policies on the age of introduction to the digital environment.”

Recommendation: Children are very much concerned about the acceleration of early use of digital technologies and its possible negative impacts. The importance of direct social relationships for younger children are strongly supported by the children (para 17).

3. Tell us how we should use digital technologies, and the risks associated with them, starting from younger age

To government: “Strengthen awareness raising activities and widely share the risks of digital technologies.” “Start awareness raising at younger age.” “Make sure that everybody receives the information by distributing education materials at certain timings like when children enter primary school.” “Make a designated day or week for awareness raising of the digital environment.” (para 33)

To schools: “Teach us how to use the digital technologies, as part of the school curriculum.” “We want time to think and discuss about digital technologies at school.” “Tell us the risks, we want to learn from those who actually experienced online harm.” “Share knowledge with us so that we will not perpetrate risks of harm in the digital environment.” “We want teachers to have full knowledge and give us advice based on correct and up-to-date knowledge” (para 34, 113, 114)

To business: “Tell us how we should use digital technologies as well as the risks and harms.” “Tell us the actual risks and harms that exist in the digital environment, but also the needs and opportunities.” “Share with us such information through programmes, advertisements and notices on the digital services used by children; TV commercials, programmes and dramas.”

Recommendation: In addition to the role of the media which is mentioned in para 58- in

providing reliable information about the nature of digital services- that of information, communication and technology companies should also be highlighted as suggested by children.

4. Provide a safer and more child-friendly digital environment

1) Legislation, enforcement and monitoring

“Listen to children and make legislation for the safer digital environment.” “Disseminate them in a child-friendly manner.” “Monitor and act on websites and accounts which are harmful for children.” “Closely monitor the comments on social media and delete harmful/inappropriate comments.” (para 16, 82, 87)

2) Safe devices

“Design safer cell phones (smartphones) for younger children with limited functions only.” (para 123)

3) Safe services and applications

“Don’t develop applications, devices, services or functions which could be used for harmful purposes.” “Reduce harmful websites.” “Make applications so that they cannot be used in a risky way.” “Companies, do not only think about profit making.” (para 37, 87)

Recommendation: After “businesses to prevent their networks or online services (from being misused...)” suggest adding “devices and functions” in para 37.

4) Tighter age/identity verification

“Make age verification procedures stricter so that users (children) cannot put false ages.” “Make filtering services compulsory by legislation.”

Recommendation: Suggest taking into consideration the fact that children are asking for tighter age/content-based control (para 56, 57). “Robust age verification” (para 122) should also be applied to protect children from harmful content, not only from “illegal products and services”.

“Strengthen security measures so that there are no identity thefts.” “Make identity verification stricter for adult users, so that only correct personal information (age, occupation etc.) can be accepted.

Recommendation: In addition to the risks of identity theft, children are concerned about the risks of harmful contact through ‘false identity’ of perpetrators (e.g. children may believe that they are interacting with a child but instead it is actually an adult with harmful intentions). Suggest the GC to include tighter identity verification for adult users

as well. (para 123)

5) Sharing of personal information

“Design so that children cannot share unnecessary personal information online.” “We want systems where personal data such as locations are only disclosed to family members.” (para 69, 85)

6) Child-friendly version

“Make terms of services more child-friendly.”

Recommendation: This can be added to para 56 or other relevant section.

7) Reporting

“Make the complaint and reporting mechanism more widely-known.” “Take immediate actions when we report and inform us of the results.” (para 45, 50, 88)

8) False information

“TV programmes and the newspapers should not spread rumors or doubtful information online.” “If false information is noticed, we want relevant companies/institutions to come out and share correct information.” “Make sure that fake news does not spread.”

Recommendation: The issue of false information should be properly addressed in the GC, including the mechanisms for fact checking and flagging of such information (para 54, 55).

5. Help us manage online experience ourselves by design

1) Screen time

“We want a design/function that we can use to easily monitor and control screen time by ourselves.” “We want companies to develop applications which promote the control of screen time and prevent excessive use.”

2) Online purchases

“Online purchases (including in-game purchases of gaming items) are too easy. We want companies to make it more difficult so that we don’t spend too much.” “We want a procedure that can help us to stop and think before proceeding to purchase online.” “We want warnings when we are spending too much online.”

3) Automated recommendation

“We do not want the automated recommendation system. We want to choose ourselves what we see online.” (para 54)

Recommendation: Many children expressed their concern about the negative impacts of

excessive screen time. We recommend that the issue is properly covered in relation to art. 6, or art. 24, and/or other appropriate section(s). Many children asked for technical support (by-design) in monitoring and managing their screen time, and tighter procedure for online purchases. We recommend such technologies and services to be encouraged in the GC to help children manage their own online experiences.

6. Provide physical locations where we can spend time away from digital technologies

“We want places where we can enjoy playing; where we can spend time without smartphones; where we can play ballgames.” “Younger children should particularly be encouraged to play outside.” “We want places at school where we can spend time after school and if necessary, can receive counselling.”

Recommendation: Children are fully aware of the importance of physical play and calling for the provisions of safe outdoor spaces. The points in para 118 could also be emphasized as children’s comments.

7. Help us before we encounter risks of harm online

“When a child spends excessive time online, it might indicate s/he is escaping from troubles at home or at school. Please notice such signs and talk to them.” “We want easy-to-access offline counselling services including at school, so that we don’t have to seek support online from sources we don’t know well.”

Recommendation: While recognizing the opportunities of counselling services online (para 102), the importance of offline services should also be mentioned, as children are well aware of the risks of harmful contact associated with seeking support online. We recommend that GC covers both online and offline services and programmes as much as possible.

8. Let us jointly set rules at home

“Do not impose rules but we want to jointly agree on rules in our family on the use of digital technologies.” “Do not try to control us without due reason.” “Our childhood in the age of the digital environment is not the same as that of our parents, so we need to talk to each other for better understanding.”

Recommendation: The Importance of the family environment should be stressed in laying out appropriate digital environment, according to the evolving capacities of each child. (para 91,92)

9. Be knowledgeable and show us good examples

“Parents, teachers should have good digital knowledge and skills to assist us.” “Do not just look at the risks of digital technologies, but also the possibilities.” “Excessive screen

time is an issue for adults as well. Please show us good examples.” (para 22, 89)

10. We are committed to:

“Share with friends what we discussed and learned today.”

“Acquire good knowledge about the nature, risks and opportunities of digital technologies.” -

“Try to control ourselves to ensure proper use of digital technologies - including screen time, sharing of information, and contact with persons whom we meet online.”

“Report when we see something wrong online including cyberbullying.”

“Create an environment where we can seek help from each other and people around us, before seeking advice online.

“Be responsible for what we say and share online and be kind to others.”

“Check the accuracy of information online.”

“Teach younger children and adults if needed, how to use digital technologies.”

“Try to find proper balance between offline and online activities.”

“Act together with friends and people around us towards a safer online environment.”

Recommendation: The Important role that children can play in protecting themselves and others, as well as in making online experience more positive should be highlighted in the relevant section(s) in the GC.