



Task Force 05

**INCLUSIVE DIGITAL TRANSFORMATION**

## Designing Digital Global Governance with children's best interests and their rights as a priority

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## Abstract

Prioritizing children's rights in digital governance is essential for a fair digital present and future. Going beyond self-regulation, G20 has the opportunity to collectively reimagine the regulation and design of digital platforms, prioritizing the safety and well-being of all young users, anticipating risks, and promoting democratic values within an intergenerational rights perspective. Despite representing  $\frac{1}{3}$  of internet users, children face unique vulnerabilities, including digital inclusion barriers, online commercial exploitation, literacy challenges and inadequate public infrastructure design, limiting their ability to exercise rights equally or influence platform governance. This is worsened by regulatory disparities and the focus of global platforms' safety investments on larger markets, sidelining Global South children.

Previous G20 initiatives (eg. "G20's High Level Principles for Children Protection and Empowerment in the Digital Environment" and "G20's Toolkit on Cyber Education and Cyber Awareness") have laid groundwork for addressing these issues by setting collective commitments based on the Convention on the Rights of the Child (CRC) and mapping out member states' efforts to mitigate online risks.

Significant gaps remain, notably, the absence of an enforceable child rights framework across G20 nations and the need for mechanisms to monitor progress. This calls for a strategy that connects digital economy objectives with the enhancement of child rights and the closing of digital divides, advocating for a child rights-by-design (CRbD) approach, a broader commitment against commercial exploitation of children and greater child participation in technology governance. This approach aligns with G20's past commitments and with the current Brazilian leadership, whose Federal Constitution mandates prioritizing children's rights as an absolute priority for all country's initiatives.



**Key-Words:** Child Rights; Child Economic Exploitation; Digital Platforms Governance;  
Child Rights Rights by Design



### 1. Child commercial exploitation impacts on health and rights

There is an urgent global need to draw the line between commercial practices and the commercial exploitation of children in the digital environment (OECD 2023). With increasing digitalization of society, the infrastructure of the digital realm mediates access to the spectrum of rights outlined in the CRC, making it a potential enabler of rights or, conversely, a barrier to their realization.

The current design of the most popular private-owned digital platforms is inherently transactional (Atabey, Pothong, and Livingstone 2023), with features primarily aimed at maximizing user engagement, online time and data gathering practices across different services for behavior monetization. This approach is rooted in a profitable business model design, where online time translates into increased revenue through advertising exposure. Children are thus submitted to contract risks (Livingstone and Stoilova 2021; OECD 2021) encompassing not only the terms of service of digital platforms, which they might not understand or consent to, but also subject to broader business practices that exploit their online activity for commercial gain, including exploitative personalisation and detrimental design features. Commercial exploitation also happens within Digital Public Infrastructures (DPIs), with cases of public-contracted educational platforms transferring childrens data for commercial gain without transparency, control, or oversight (Human Rights Watch 2022).

Excessive child screen time is linked to a spectrum of physical, mental and developmental health issues, with research correlating its impacts with visual impairments like myopia (Foreman et al. 2021), sleep disruption that impacts restorative rest (Eisenstein et al. 2019), diminishing rates of physical activity (Guthold et al. 2020),

spinal health issues (De Vitta et al. 2023), diminished motor skills (Lin, Cherng, and Chen 2017), delays in speech and language (Madigan et al. 2019), negative effects on learning attention (Rocha et al. 2021) and increased anxiety and depression (Office of the Assistant Secretary for Health 2023).

Addressing the health consequences associated with digital platform design safeguards individual child well-being but also speaks to broader economic, public health and future societal outcomes, especially considering children's development stage and their evolving capacities.

## **2. Regulatory challenges, global disparities**

The absence of enforceable global governance to protect children's rights online presents a complex challenge. While international frameworks and commitments exist (**Appendix**), the capacity of countries to enact and enforce legislation in line with the CRC and its General Comments (GCs), notably GC No 25, varies significantly. This discrepancy risks creating a fragmented landscape of child safety initiatives, leading to global disparities in protection. For instance, Europe's prohibition of profiling for child advertising offers a safeguard not yet available in many Global South countries, highlighting the need for a harmonized approach that ensures consistent protection, regardless of geography, ensuring CRC's right to non-discrimination.

Rather than developing policies that speak to the needs of children in vulnerable contexts, large tech companies have a history of discrimination against Global South children. A report by Fairplay (2022) showed that Meta's policies and user agreements were less protective towards children in countries from the Global South compared to the North. Similarly, despite an increase in school violence in Brazil in 2023 linked to its use

(Rodrigues 2023), Discord maintained no operational presence in Brazil, even though it's their second-largest market (Romani and Arimathea 2023).

### 3. Data for visibility

Quality information is essential for evidence-based decision making on platform's design regulation. However, the current state of research about digital risks faced by children and its correlations with platform design seems fragmented.

Firstly, there is a lack of a unified global taxonomy for addressing design risks that affect children. While significant work has been done on issues like Child Sexual Abuse and Exploitation (CSAE) (End Violence Against Children n.d.; Tech Coalition n.d.; Out of the Shadows 2022), other risks remain underexplored. The Child Online Safety Index (COSI) and other tools offer potential for global comparative analysis, but access to these resources is often restricted by paywalls, and their design methodologies may not fully capture the diverse experiences of children globally nor adequately safeguard cultural differences in data collection design methods. Beyond design, there's a need for training support and financial backing for global evidence collection, particularly in low-and-middle income countries. Funding streams for projects that tackle child digital risks or aim to generate evidence-based research are limited and highly competitive<sup>1</sup>.

Secondly, large platforms give unequal conditions of data access to researchers to a deeper investigation of risks. Most-used global platforms, like TikTok, limit data access to researchers in the Global North, potentially leading to geographic inequality in platform research knowledge generation.

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<sup>1</sup> In 2023, the Safe Online Fund received 400 million USD requests for global projects but could grant only 5% of the value (NICbrvideos 2024).

Thirdly, although GC No 25 indicates that States should require digital business to conduct child rights due diligence practices, such as carrying out and publicizing Child Rights Impact Assessment (CRIAs) on the impacts of the design, development and execution of digital services used by children, there is a need to guarantee individual State capacity to adopt and enforce those frameworks. Another challenge is designing and enforcing CRIA models that allow cross-country comparison, while still maintaining flexibility to identify contextual emerging threats and capture specific inequalities keen to understand how risks can produce harm.

#### **4. Ensuring meaningful child participation**

The CRC and its GCs No 12 and 25 determine that children have the right to be heard in all matters affecting them, guaranteeing their active participation in digital governance. Their unique perspectives provide crucial insights into the online risks and opportunities, often differing from adults' understanding. Integrating child participation effectively into governance structures poses challenges, from overcoming participation barriers to avoiding tokenistic involvement. Ensuring meaningful participation requires proper methodologies, funding, and sustainable initiatives that allow and actively support children's voices in decision-making processes.

## Recommendations



### Global commitment and framework enhancement pillar

- **Clear Statement Against Commercial Exploitation of Children:** Issue a joint cross-sectional declaration with the support of all Digital Economy Working Groups (DEWGs), stating that technological advancements and governance must explicitly prohibit any form of commercial exploitation of children. This stance is in alignment with Article 227 of the Brazilian Federal Constitution and with the UN's CRC, ensuring that child rights are paramount in the advancement and governance of digital technologies, including initiatives on meaningful connectivity, Artificial Intelligence, DPIs and Information Integrity.
- **Defend Child Rights Centrality in G20:** Propose the creation of a child-centric engagement group for future G20 summits to ensure child rights are integral to international economic discussions (eg. Kids20).
- **Update G20 High-Level Principles:** Strengthen and update existing G20 principles and commitments, such as the G20 High-Level Principles for Children Protection and Empowerment in the Digital Environment (G20 2021), with new commitments against child online commercial exploitation and against child behavioral profiling for advertising purposes. Celebrate and launch the commitment, signaling to the Global Community that the development of a child rights-based approach for digital governance is a global priority.
- **Monitoring and Accountability:** Establish a Commission or Observatory to monitor, report and develop action plans on the adherence and effectiveness of child protection principles within the G20 High-Level Principles. The Commission could be entitled to research, gather initiatives and share age-



appropriate health and safety standards for platform design amongst G20 countries;

- **Global Risk Monitoring with Common Taxonomy:** Monitor global risks with a universally agreed-upon taxonomy that respects the nuances of different contexts of risk and protection factors, making data collection freely available. Identify and catalog current efforts addressing data on child rights in the digital environment to prevent duplication and enhance effectiveness.
- **Strengthen recommendations regarding the need for consideration of different regional contexts by technology companies in human rights due diligence processes:** Encourage States to adopt measures to ensure that large technology companies are adequately represented institutionally in all jurisdictions in which they operate, so that they can effectively engage with local authorities and understand the cultural and socioeconomic particularities that impact the experiences of multiple childhoods. States must ensure that they can cooperate rapidly with companies in emergencies and that the CRIAs conducted by companies will be based on data stemming from local contexts.
- **Transparency and Data Accessibility:** Require that digital companies provide open access to disaggregated data, supporting evidence-based decision-making, research and cross-country comparison on child online safety. Call for free and equal access to data for worldwide researchers investigating systemic risks, inspired by sandbox strategies.
- **Child Empowerment:** Ensure concrete efforts to actively involve children, providing financial means to overcome participation barriers and promoting and sharing innovative practices on participatory methods.

- **Financial pillar**
- **Funding for Child-Centric Research:** Increase funding for initiatives exploring the impacts of digital technologies on children. Monitor global fund investment distribution and allocate specific funds to low and middle income countries.
- **Initiatives Against Commercial Exploitation:** Direct resources towards detecting, preventing, and raising awareness about the commercial exploitation of children online. Ensure digital literacy from an independent approach, fostering a critical view of the business models adopted by large companies.

### **Digital participation pillar**

**Digital Infrastructure Improvement:** Prioritize the access of children in public infrastructures, ensuring their rights are integrated by design, including in digital public infrastructures (DPIs). This includes ensuring high levels of meaningful access, privacy, data protection, and prohibiting any commercial exploitation on their interaction with public platforms. Support low-income and developing countries in enhancing their digital infrastructures to create social participation platforms using emerging technologies, while also carefully avoiding amplifying inequalities of access to public services for those who are digitally excluded.

## Scenario of Outcomes

This approach, combining national commitment, financial support, and technical assistance, along with a renewed global commitment through the G20 High Level Principles for Children Protection, can strengthen the protection of children in the digital environment.

For the **Global Commitment and Framework Enhancement**, a proactive stance could lead to significant savings by preempting future corrective costs in health and education. It positions the international community towards a future that prioritizes child rights, continuing G20's leadership in harmonizing platform regulation, consumer rights, and child protection and provides a structure for monitoring and continuity to G20s commitments. Developing standards for child digital platforms might deter new players due to regulatory burdens. However, this is mitigated by new innovation opportunities driven by child well-being. There is also a need to map and unify existing efforts, networks and commitments, avoiding duplication. The lack of involvement of countries outside the G20 Initiative could exacerbate disparities, considering the correlation of socio-economic inequalities and digital harms. Therefore, meaningful global inclusion must be prioritized.

The **Data Recommendations** enhance the transformative power of data in realizing children's realities, fostering effective evidence-based policy strategies. It sets a global benchmark for upholding the non-discrimination principle of the CRC, enhancing global participatory diversity. Nevertheless, privacy concerns and the requirement for secure data management to prevent commercial exploitation poses challenges. National and global priorities might not be the same, highlighting the discrepancy between

representational frameworks and lived realities. New and emerging risks pose a significant challenge, needing an adaptive approach that is not stagnant.

**National Commitments** aim to prioritize children's interests in decision-making processes, aligning with Article 3.1 of the CRC. Yet, the imposition of such commitments may find states at varying readiness levels, posing challenges in adoption and enforcement. Thus, international collaboration and knowledge exchange should be a high priority.

In the **Financial Pillar**, fostering all-sector involvement paves the way for a sustainable model of international cooperation. However, mechanisms of funding and management may introduce conflicts of interest, requiring a balanced and mediated private sector engagement and governance to ensure long-term sustainability. The risk of reinforcing the digital divide through unequal resource and knowledge distribution requires a cohesive global strategy to advance child rights uniformly.

**Digital Participation Pillar** aims at developing technologies for the empowerment of all children. Improving participatory mechanisms through emerging technologies could potentially enhance child participation possibilities, but there are obstacles, such as age barriers, limited internet access, insufficient digital literacy and unsecured online environment that deprive children of opportunities to express their views through the digital world, including expressing their own opinions on the design and governance of digital platforms (Byrne, Helsper, and Vosloo 2023). This calls for a mixed approach that balances offline community engagement with increasing digital participation opportunities.

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## Appendix

### [International Frameworks for Designing Digital Governance with children’s best interests and their rights as a priority](#)





# Let's **rethink** the world

