



NOCTA

Nordic Child Tech Policy Alliance

Vision Statement

December 11th 2024

1. Introduction

Today, more children than ever use digital technology daily. For them, access to the digital environment has become a fully integral part of their daily lives. In the Nordic countries, children engage in activities in the digital environment for things such as leisure, to learn about the world and nourish friendships, but also because it is increasingly expected of them by parents, caregivers, schools and the public authorities. Meaningful and equitable access and use of digital technologies contributes to enhancing children's ability to fully enjoy their rights. At the same time, it also presents numerous risks and challenges. The growing presence of digital technology in children's lives requires that we think deeply about its impact. To secure a digital environment that protects and empowers children's rights, and that supports their mental health and wellbeing, decision makers need to adopt a child-centred approach to tech policy.

Through the United Nations Convention on the Rights of the Child it is established that children are human beings and independent holders of their own rights, that all children should enjoy their rights regardless of their background or family situation, and that children's own views and voice matter in all decisions affecting them.

When children's rights and voices are not actively incorporated into decisions, they are often overlooked, and their rights and agency undermined. Therefore, in today's polarized debates around children's digital presence, a strong, independent, and child-centred voice is more crucial than ever.

1.1 The Nordic Child Tech Policy Alliance (NOCTA)*

The Nordic countries share history, culture, values, and have a similar perspective on children and their rights. This includes values concerning the importance of all of children's rights, that children are not a homogenous group, the welfare system as well as regulating commercial services.

Children in the Nordics need to be perceived as individual rights-holders and have the same opportunities, safety and security independent of their socio-economic or other background. All children's rights are of equal importance and should be weighed and prioritized dependent on the child's age, maturity, cognitive, social and emotional development. Subsequently, as children develop, there should be an increasing independence under the responsibility of the digital provider, in accordance with their evolving capacities. This is currently not reflected in children's digital environment.

A large proportion of regulation of online services is determined from the EU and in an international context, where we as individual Nordic countries are relatively small markets. NOCTA's members are united in our commitment to strengthen and uphold this progressive perspective on children and their rights. We believe that we will have greater success if the Nordic countries work side by side.

By working together, we can collectively deliver and amplify this voice in the public conversations and ensure the best interest of the child is placed at the centre of legislative efforts and actions by tech companies.

Subsequently, as a response to Prinsparets Stiftelse's (SE) conference on children's rights in the digital environment in February 2024 in Stockholm, Børns Vilkår (DK) and Prinsparets Stiftelse (SE) established an alliance currently consisting of Bris (SE), Digitalt Ansvar (DK), UNICEF Sverige (SE) and Barnevakten (NO). As children's rights organizations, child helplines and knowledge centers on children's rights and tech, our aim is to protect and strengthen children's rights in the digital environment.

*The group currently includes organizations from Sweden, Norway, and Denmark, and we look forward to welcoming representatives from all Nordic countries going forward.

2. Background

2.1 Growing concerns about children's digital presence

In the United Nations' General Comment No. 25 (2021) to the Convention on the Rights of the Child, the Committee on the Rights of the Child emphasises in that "The digital environment is becoming increasingly important across most aspects of children's lives, including during times of crisis, as societal functions, including education, government services and commerce, progressively come to rely upon digital technologies. It affords new opportunities for the realization of children's rights but also poses the risks of their violation or abuse."^{*}

As children's digital presence expands, concerns are increasingly being raised about its direct and indirect impact on their rights and well-being. In the start of the 2020's there have been a growing number of indicators of children's challenges such as mental health challenges, eating disorders, violent extremism, fake news and grooming for sexual purposes occurring on and exacerbated by online services provided by tech companies. This is supported by various national child helplines' data, where a substantial proportion of calls received was directly or indirectly about children's digital lives.

These alarming trends have pushed decision-makers to strengthen regulations aimed at better protecting children from harm, violence, and exploitation through digital technology. So far, individual EU countries have struggled to create laws for tech companies and online services because these areas fall under the EU's jurisdiction requiring harmonized rules across member states.

The digital environment is highly commercialized, with businesses like social platforms, search engines, and data brokers shaping digital tools and experiences. It is crucial that these actors respect children's rights and are held accountable for any adverse impacts they cause or contribute to.

Legislative actions, like the AI Act, Digital Services Act, Digital Markets Act and the coming Digital Fairness Act in the EU, show a strong commitment to regulate tech companies. Some countries, including the United Kingdom, Australia, USA (California), and the Netherlands, have also introduced national guidelines or laws to protect children online.

^{*}UN Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment (CRC/C/GC/25). Retrieved November 28, 2024, from <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>.

2.2 The missing voice of the child

The internet, and the most popular digital services that children use on a daily basis, were not created with children's rights or wellbeing in mind. Firstly, children are not a homogenous group, as they differ in age, background, nationality, cognitive abilities and emotional stage. Nonetheless, due to their (naturally) more limited life experience and maturity compared to adults, children are on average more vulnerable. This includes that they are on average more easily impressionable, less able to predict consequences of behaviours and have limited experience in self-regulation such as delaying gratification. As children are more vulnerable than adults, they are subsequently at risk of being disproportionately impacted.

Unlike for physical toys or other products to be used by children; digital games, social media, entertainment apps and new features are frequently launched without adequate safety measures or with consideration for children's rights. This puts millions of children at risk, particularly those without parents, guardians or other adults who can support or guide them.

2.3 Need of a child-centered view and approach ('barnsyn')

In recent years, several pieces of important legislation on tech - and subsequently children's digital environments - has been drafted in the EU. It has become clear from the legislative process around tech and children's rights, that there has been a limited involvement of knowledge- and rights-based organisations, that focus specifically on children's rights, perspectives and experiences.

Many of the current recommendations and legislation on children's online presence rely heavily on the fact that parents/guardians are available to guide and safeguard their children in a responsible way until they reach maturity and adulthood. However, this is not the case for many children today.

To ensure every child can survive and thrive in the digital environment, a holistic, child-centred approach must be the foundation for developing recommendations and policies about digital environments where children are present.

3. Our work

The goal of creating NOCTA is to, through our collective knowledge and efforts, advocate for child-centred industry actions, reinforced by policies and measures, that delivers on the best interest of the child.

Our vision is a digital environment that helps every child enjoy the full range of their rights, that supports their mental health and wellbeing, and that empowers them with the cognitive, emotional, interrelational and democratic knowledge and skills to navigate safely and consciously online.

3.1 Our core principles

NOCTA's work is founded on the following core principles:

- A child is anyone below the age of 18 years, as defined in the Convention on the Rights of the Child.
- The best interest of the child should be the primary consideration in all decisions and actions that affect children.
- A rights-based approach is needed to the digital environment, which perceives the individual child as a rights-holder with a full range of rights, independent of their socio-economic background, nationality, age, gender, minority affiliation etc.
- The view of children, including an approach to tech, needs to be based on the evolving capacities of the child and their rights to express their views in matters affecting them.
- The design of digital environments needs to consider 'children' as a group in their full diversity, whereas certain groups of children have unique needs that deserve focused attention, and that different rights should be supported and prioritised based on the child's capacities.
- Policies, legislation and interventions should be underpinned by children's voices and evidence and be developed to protect and empower the most vulnerable children.

3.2 Our calls to action

NOCTA calls for the following key actions to protect and support children's rights in digital environments. These key asks are grounded in the voices of children shared through Nordic child helplines, as well as our expertise as Nordic child and human rights organizations, and are underpinned by our core principles.

Empowerment:

- **Empower children with knowledge and tools:** Equip children with age-appropriate resources to understand their rights in the digital context and also to be able to recognize harmful online behaviors, (such as grooming or sextortion). Provide clear and accessible guidance on safe online practices that help children navigate digital environments with confidence and make informed decisions about their safety.
- **Make reporting easy for children:** Create easy, age-appropriate reporting tools for children, ensuring accessibility and safety. Prioritize their reports with timely responses, considering their vulnerabilities and make continuous improvements based on their feedback.
- **Empower parents without shifting the burden:** Design user-friendly tools that support and complement parental responsibility while respecting children's evolving capacities and increasing need for autonomy. Implement child-sensitive safeguards to ensure child protection responsibility are not placed unduly on parents and caregivers.

Protection:

- **Safeguard children's data:** Protect children's privacy by prohibiting the sharing or selling of their data.
- **Put child wellbeing over monetization:** Do not target children with commercial advertising or content and prevent their exposure to digital marketing of harmful products or services, ensuring their digital experiences prioritize educational, social, or recreational value over monetization.
- **Apply great caution with AI companions for children:** Reassess the deployment of any "AI Companions" (anthropomorphic/humanlike AI-driven chatbots) for children to ensure they are subject to robust precautionary measures, such as sufficient supervised safety training and oversight, clear guardrails, responsible and clear limitations of data collection, are age-appropriate, non-exploitative and transparent in their design and interactions.

3.3 Implementing and enforcing existing policies and legislation

NOCTA also urges businesses and policymakers to adopt a child rights approach when implementing and enforcing existing legislation (such as the DSA, DMA, AI Act, CSRD, etc.) and international frameworks, and will work to ensure children's rights are consistently integrated into relevant processes and actions. We will continuously develop and advance this work and look forward to constructive discussions.

Annex I: NOCTA organizations*

The Nordic Child Tech Policy Alliance consists of:



Barnevakten is a Norwegian, independent foundation that provides facts and advice about children and the media. Our vision is that children should use the media in a safe and conscious way.

BRIS

Bris stands for Children's Rights in Society, and we are a children's rights organization. We work for a society where all children know their rights and have the possibility to fulfill them!

BØRNS VILKÅR

Børns Vilkår is a Danish children's rights organization and runs the national child helpline with over 60.000 conversations each year. Børns Vilkår has for the past years worked to protect children's rights online nationally and in the EU.

/Digitalt Ansvar

Digitalt Ansvar (Digital Responsibility) was created to promote responsible digital development that protects our fundamental rights. It is about the right to privacy and a life free from violence, harassment and surveillance.



PRINSPARETS
STIFTELSE

Prinsparets Stiftelse (The Prince Couple's Foundation) is a Swedish foundation founded by TRH Prince Carl Philip and Princess Sofia. The foundation's mission is to promote a safer internet for children, as well as increased understanding for everyone with dyslexia.

unicef 

för alla barn

UNICEF, the United Nations organization for children, works globally to protect the rights and well-being of every child. UNICEF Sweden is one of 32 national committees, dedicated to supporting UNICEF's mission by mobilizing resources, influencing Swedish decision-makers, and raising awareness about children's rights.

*As of December 10th, 2024

