



GPA

Global Privacy Assembly

Digital education Working group

Report – 28 September 2023

Chair authority: CNIL, France



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Introduction & Executive Summary

Lead Partner: FR - Chair: CNIL, France - Marie-Laure DENIS & Pascale RAULIN-SERRIER

The Working Group on Digital Education (DEWG) was created by the resolution adopted by the GPA in 2013 "[A Digital Education for All](#)" and mandated to "provide specific protection for minors in relation to the digital world".

Protecting children's privacy online is a sustainable priority. Raising children's awareness and promoting data protection through education, helping them become responsible digital citizens and exercise their rights while maintaining the principle of parental responsibility are key objectives of actions undertaken by the DEWG over the years.

One of its overarching aims is to promote digital education that respects the rights and freedoms of children by informing all relevant actors.

The work of the GPA aims to influence groups such as the holders of parental authority and those who work closely with children and adolescents such as guardians, teachers or educators, and companies. They should all benefit from educational programmes, actions and awareness campaigns in digital education in order to improve their knowledge of the challenges, opportunities and risks linked to the digital practices of children, as well as the children's rights in the digital environment.

Within the framework of the GPA 3-year programme 2021-2023, the DEWG has continued to develop common activities between the DEWG members relating to children's rights and digital education.

The DEWG conducted three mapping exercises to implement the 2022-2023 workplan that built capacity for members and led to the promotion of best practices in these matters. The CIRCABC online library also increased the number of users and contribution of education resources continuing updating of the base.

By liaising with international organisations and partnering structures committed to the promotion of children's rights in the digital environment, the DEWG also aims to build upon reinforced international cooperation on digital education by activating the entire ecosystem of public and private actors.

This partnering approach has proved useful over the year to expand the impact of the DEWG's actions and benefit from valuable competences and synergies on safety- and privacy-by-design, age assurance issues and education to digital citizenship within the international landscape.



The Group was expanded in 2023 and now numbers 85 Data Protection Authorities, active members and observers.

List of the Digital Education Working Group (DEWG) members:

Name of Members Authorities by Region (Europe, Africa, North and Latin America Asia-Pacific) (85):

Europe (48) : Albania, Austria, Belgium, Bosnia-Herzegovina, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, Germany (and 7 regional authorities), Georgia, Gibraltar, Greece, Hungary, Iceland, Ireland, Malta, Spain, Italy, Jersey, Latvia, Lithuania, Luxembourg, Macedonia (FYROM), Moldova, Monaco, the Netherlands, Norway, Poland, Portugal, Romania, San Marino, Serbia, Slovakia, Slovenia, Spain (AEPD, and Catalonia), Switzerland (and Swiss cantons), the United Kingdom;

Africa (11): Burkina Faso, Cape Verde, Gabon, Ghana, Ivory Coast, Mali, Mauritius, Morocco, Senegal, Tunisia, Turkey;

North America (7): Canada (OPC, Quebec, Ontario, Alberta, Nova Scotia), the United States (FTC), NYC Office of Information Privacy;

Latin America (5): Colombia, Mexico (INAI), State of Mexico (INFOEM), Mexico City (INFO CDMX), Uruguay;

Asia-Pacific (9): Australia, Australia (Victoria DPA), Hong Kong, Japan, Korea, Macao, New Zealand, the Philippines, Singapore;

Middle Near East (1): Israel;

Name of observers (6): AFAPDP, the Council of Europe, the EDPS, OECD, UNESCO, the UNICEF.



Working Group Activities

As part of its 2022-2023 work programme, initiatives have encouraged to pursue the implementation of additional aspects of the 2021 GPA [Resolution on Children's Digital Rights](#).

These activities were mainly focused on capacity building for GPA members and **covered four main workstreams:**

Action 1

- **Support DPAs to effectively implement assistance, redress, request or complaints mechanisms to ensure that they are made more accessible to children and/or their legal representatives regarding any violations of their rights.**

It seemed important to the DEWG to encourage the DPA community to continue working on this objective aiming at improving direct or indirect operational pathways to access assistance or redress mechanisms which remain globally insufficiently used in case of children's privacy breaches.

The action to facilitate the exercise of children's rights is a continuation of previous initiatives within the DEWG to address this concern and provide young people or their legal representatives with a clear and rapid response to their requests to have harmful content deleted.

This year, the mapping exercise conducted over the second quarter of 2023 is providing an overview on best practices related to effective remedies made available in compliance with national jurisdiction.

The main lessons learned from the responses of the DEWG panel of 20 DPA members representing Europe, North America and Asia¹ :

Q 1.a/ Have you implemented (or are you thinking about it) procedures for children such as:

- ***channel dedicated to children or their legal guardians,***
- ***privileged pathways with social network platforms, or***
- ***pathways with other institutional or NGO partners,***

regarding violations of their rights to quickly delete content or to fight against cyberbullying of children?

¹ **CA:** Canada - **CH:** Switzerland - **DE:** Germany (Berlin) - **FR:** France - **GI:** Gibraltar - **GR:** Greece - **HK:** Hong Kong - **IE:** Ireland - **IT:** Italy - **LT:** Lithuania - **LU:** Luxembourg - **NL:** Netherlands - **NOR:** Norway - **PH:** Philippines - **POL:** Poland - **SK:** Slovakia - **SL:** Slovenia - **SP:** Spain - **SW:** Sweden - **UK:** United Kingdom



In all the countries studied, a limited number of data protection authorities have specific powers conferred by their national legislation on cyberbullying (IT, SP), namely to investigate requests for the deletion/blocking of data relating to minors processed illegally for cyberbullying purposes in accordance with a specific procedure defined by their law.

This is the case with the Italian Data Protection Code (amended by Law on December 2021) which sets forth a specific procedure for revenge porn cases: *“Whoever, including children above fourteen years of age, has reason to believe that audio recordings, images, videos or any other IT documents with sexually explicit contents relating to them and intended to be kept private are likely to be sent, delivered, transferred, published or disseminated by way of digital platforms without their consent may report this danger to the Garante”*. A procedure for requesting the deletion/blocking of offending data can be introduced.

As another operational example, the introduction by a DPA (SP) of a priority channel for dealing with requests for urgent removal of online content of a sexual or violent nature (images, audio), disseminated on the Internet. It illustrates a procedure that is clearly displayed on the pages dedicated to children on the authority's website. By addressing minors under the age of 18 directly, the DPA aims to alert them to the existence of this procedure for removing harmful content and to invite them to contact the authority directly via a specific line accessible by telephone, email and WhatsApp.

It should be noted that this statutory power can also be exercised in the context of cessation notices issued by the DPA (HK), which require social networking platforms to remove doxxing content involving personal data disclosed without the consent of the data subject and where the discloser intends to cause specific harm. This cessation notice, while not restricted to children, can be used to remove doxxing messages that also contain children's personal data.

While it appears that some authorities do not have specific access channels or a dedicated pathway for dealing with requests for information or complaints from children concerning their personal data, or for exercising their rights, they emphasise that minors can always submit a request via the general access channels intended for adults. This can be interestingly illustrated by the specificity mentioned by a DPA (CA) whose complaint forms do not ask children or young complainants to identify themselves, or indicate their age or date of birth.

As a result, some data protection authorities, unlike others, do not have the capacity to regulate in this area, and do not currently plan to set up specific procedures to deal with cyberbullying.

In some jurisdictions (IE), **cyberbullying is seen as more of an online safety issue than a data protection issue.**

On the whole, DPAs have emphasized that they are able to take action with regard to the exercise of the right to erasure of prejudicial data online by providing minors with tools to combat cyberbullying.



Finally, data protection authorities are unanimously much involved in digital education through the creation and dissemination of numerous teaching resources, in particular in conjunction with educational actors, as demonstrated by the examples provided as part of this survey.

Awareness-raising and educational activities are largely carried out to improve young people's control of their personal data and exercise of their rights on online platforms. In line with this, workshops, resources and educational games offering content adapted to the youngest Internet users are being used to teach children and teenagers how to be responsible and safe online.

Moreover, some authorities have highlighted measures taken to facilitate the exercise of children's rights which refer to specific pages on their websites dedicated to young people on the Internet (CA, IT, NOR, SL, SP, UK).

Various initiatives, such as campaigns targeting parents, conferences and training courses for professionals and experts, are run by DPAs to provide information on data protection, particularly in the context of the publication of illegal content on the Internet and how to deal with it.

[The DEWG study report](#) published in May 2022 on good practice and junior sites, which was based on a panel of 24 DPAs, identified a creative and cultural wealth of best information practices, presented in understandable language and with attractive iconography for young people and/or their parents, which could guide and inspire the development of our respective sites.

In line with this, one authority (UK) pointed out that it considered and checked that the language used in the procedures posted both on their website and on the complaints form was such that it could be understood by a child who is at least 13 years-of-age.

Q 1.b/ What were the points that led you to consider that these procedures are necessary?

These rely mainly on observations linked to the current context, which is marked by a certain upheaval in family relations, reflected on the one hand, by the technological mastery that young people are demonstrating in their access to audiovisual content, and on the other hand, by a lack of media education on the part of adults and young people alike.

What's more, while parents do not always seem to be aware of the dangers of the Internet for their children, posting photos of their child on their own initiative ("sharenting"), they also do not seem to have the right tools and technical knowledge to protect them effectively.

Accordingly, the arguments put forward are intended to:

- help families and education professionals deal with very complicated everyday situations, such as the publication of sensitive images of children on social networks,
- respond to the need to facilitate the exercise of rights by minors and their legal representatives through simplified and appropriate access to information.

Q 1.c/ Are these procedures linked?

- *the handling of complaints by your DPA? and/or*
- *other channels for dealing with children's requests?*



Opinions differ as to whether the introduction of specific procedures for responding rapidly by deleting content linked to acts of cyberbullying falls within the scope of complaints investigated under the powers and procedures of the data protection authority.

Q 1.d/ Have you noticed a reduction in the average processing time by your authority thanks to the request transmitted via the dedicated channel? On average, how significant?

There were few responses to this question, although some quantitative data on the number of cases involving minors was provided (CA, SP) or regarding tight processing time established by law (IT).

However, the complaints lodged with our authorities are most often the result of difficulties encountered with online platforms in deleting personal data.

It may therefore be considered that the processes described and put in place by DPAs (IT, FR, HK, SP) or designated competent authorities aim to provide a rapid and effective response to requests for the removal of content harmful to minors when the complaint is well-founded. Even if improvements are still possible and even under consideration among some DPAs.

Q 2. / Have other national institutions or associations supported by the public authorities set up procedures for reporting content that is offensive to minors?

There is obvious sense-making practice of partnerships aimed at fighting against digital violence with a variety of institutional structures and associations supported by the public authorities, in particular:

- Police cybercrime units,
- Regulatory authorities in the telecommunications sector,
- Ombudsmen for the protection of children's rights,
- Child protection associations,
- The entities responsible for operating the national emergency lines.

This cooperation with data protection authorities promotes a synergy of expertise that is accessible to children and young people or their parents/legal guardians.

The specific framework of a priority channel perpetuated in 2022 in the arsenal of one of the DPAs has proved to be an effective instrument in situations where the physical and psychological integrity of the people concerned is seriously threatened by the dissemination of videos, audio content or other information that is put online and disseminated. These acts constitute digital violence, particularly against women, children and vulnerable people.

The fight against illegal content on the Internet is a global problem that is not confined to national borders.

As a more global response, it appears that setting up **hotlines** is an essential component of a coordinated action to illegal and harmful use of the Internet. Complaints can be dealt with more quickly and effectively at both national and international levels, and appropriate measures can be imposed in the country where the illegal content is originated.



[The INHOPE network](#), cited in almost all the survey responses, brings together helplines in 40 or 50 countries around the world and coordinates the hotlines in each country.

It appears that this network provides a forum for exchanging information and experience on complaints investigation processes, offering training and facilitating helplines to develop and implement good practice throughout the network (see the existence of an [INHOPE code of practice](#) as pointed out).

Other comments made by DPAs emphasised the key and complementary role of competent organisations in providing advice on how to lodge a complaint or investigate complaints concerning violations of children's rights. Trained counsellors are able to guide minor "victims" towards possible psychological support and redirect them, as appropriate, to other competent institutions. It includes in particular, alerting referents responsible for dealing with incidents of harassment, including cyber-bullying in schools where appropriate (CA, LT, NOR, PH).

The detailed report can be obtained at the DEWG's coordinator.

Action 2

- **Conduct a survey aimed at assessing “Teachers’ perceptions of the personal data protection and digital citizenship”.**

As agreed at the 44th Annual Meeting to make it a national strategic priority, the DEWG launched a survey with the objective to explore teachers' relationship to personal data and digital citizenship, and more precisely:

- how they put into practice these specific topics in their data protection awareness-raising activities and lesson plans with their students, how often,
- whether they need to be more supported by external expertise from our DPAs resources and practical cases to guide them in their class, and
- assess their expectations for improving their knowledge and capacity to better address these topics.

This initiative engaged as early as 2022 has been carried out by the co-leading group of 4 DPAs, namely CNIL France, CNDP Morocco, CNPDCP Gabon, UODO Poland (called the “Steering group”). (See the background of the project in the [2021-2022 DEWG annual report](#)).

Stages performed from October 2022 to September 2023:

- Elaboration of two draft questionnaires aimed at primary and secondary school teachers (19 multiple-choice questions and limited open-ended questions) tested at a panel of international teachers;
- Providing an explanatory Guide including methodology and a prospective time schedule;



- Conducting a poll to the DEWG members on their willingness and opportunity to engage in this joint survey, and where feasible, in close cooperation with their Ministry of Education in national or local settings;
- Translation of the two questionnaires for teachers into Spanish, Polish and Arabic in addition to the French and English original versions;
- Adoption of a common operational methodology to look for the greatest possible homogeneity in the work upstream so as not to bias the results when conducting the subsequent analysis of international data compiled in a common basis;
- The CNIL team has been acting as lead for the subsequent tasks of cleaning the individual country raw databases for consistency and comparison of data indicators, processing the results for each level (primary, lower secondary, upper secondary) and commencing the analysis work;
- Under the current period, ongoing coordination phases are being conducted with all DPA partners committed in the survey (validation of the findings, main trends, drawing up first conclusions and recommendations and drafting the final report to be shared with the GPA members.)

Targets surveyed:

- The survey was conducted among teachers of all school in public and/or private elementary, middle and high schools, including library departments, where such educational staff are in contact with students on a regular basis, according to the national culture, regarding the use of digital technology.
- It covered the age range of students from 6 years to 17+ years.
- The teachers' profile in the survey was limited to the class level(s) and the subjects taught. No age marker or time in service was requested in order to respect strict anonymity of the survey.

Representativity of the survey:

In the first phase of the project in 2023, this pilot project was supported by a small group of 9 DPAs. Despite the challenges encountered by other countries relating to either lack of time, human resources, support of educational authorities or other competing time commitments, the steering group considered however that the survey was worth pursuing. Finally, only 5 DPA partner countries performed the teachers' survey until the end while a few others declined in the second phase due to excessive daily academic workload in schools during this period.

Thanks to the contribution of a total panel of 840 school teachers from national and regional primary and secondary school teachers representing European and African countries, this pilot global survey report will be considered worth providing updated findings, conclusions and recommendations to the benefit of all stakeholders concerned, including the educational community, governments and decision makers, and DPAs. And because the obvious international consensus is that qualified teachers matter to impact on the acquisition of students' digital competences.



The time schedule to produce the final report and recommendations is being adjusted to maximize opportunities for peer learning between participating countries and the DEWG over the last quarter 2023. Communication plans will be developed in late November/ December 2023.

A previous international [Progress report on the training of trainers in the field of data protection](#) had been conducted in 2015 by the DEWG which led to the development of the innovative and quite successful [International Competency Framework for School Students on Data Protection and Privacy](#) intended to teachers and adopted by the GPA in 2016.

Action 3

- **Collecting awareness raising activities among children and the general public (targeting parents and educators) about the importance of their personal data and the need to protect it undertaken by data protection authorities over the year 2022-2023.**

A survey has been conducted as a pro-active common thread collating GPA members “success stories” conducted on the occasion - but not limited to - specific events such as the International Children's Rights Day (20/11/2022), Data Protection Day (28/01/2023), Safer Internet Day (07/02/2023) and the Data Protection Week within the APPA area (in May 2023).

The DEWG has received this year relevant and successful outputs of many DPAs ranging from *educational shows with public libraries and film forums, escape games with specific missions on privacy issues, to new school competitions, the production of surveys aiming at both young people as digital users, and parents in their practice of sharenting, guides and kits for children, or the creation of youth digital platforms, etc.*

The current task consists in consolidating a **repository** divided into several sections, namely Physical events, Use of social networks, Surveys / Studies, Competitions and Platforms and referring to the target audience. All these very pro-active activities of the GPA community might find applicability in other countries. The draft developed is

Once presented in an attractive way, the repository will be circulated among the DEWG and also published on the GPA website in early autumn 2023 to increase visibility of a dynamic GPA community of practice. Such an interesting pooling of innovative events, creation of materials and micro-sites for children & adolescents covering a wide range of topics on the risks and rights associated with the Internet is worth being promoted via respective DPA networks in the wider educational community.

In line with this, visibility was also created on the [DEWG corner](#) on the GPA website to promote:

- The 2022 People's Choice Prize rewarded last October 2022 to the Danish Data Protection Agency's online learning game for children called "[Datadsystem](#)".
- The web links related the authority's [14 valuable entries](#) submitted for the 2022 GPA Global and Privacy Awards.



it is worth noting that, once again this year, the Education public awareness category was rewarded as the Public's choice among all DPAs projects as in 2021 with the Gibraltar's campaign "Control your privacy".

Action 4

- **Provide advice and guidance to improve transparency of platforms on information and rights of children in accessible and child-friendly formats adapted to their age and maturity**

Indeed, the mapping exercise on this topic needs methodology since it consists of monitoring:

- legislation which came into force (for instance in the EU, the Digital Service Act, which entered into force on 16 November 2022, highlighting the need for of clearer 'notice-and-action' procedures, including transparency and feedback to users' notifications)
- self-regulatory initiatives that will gather good practice and recommendations to support the industry in making their platforms safer by design for children
- existing codes/guidelines from data protection authorities, authoritative guidance from subject matter experts, consultation/research with young people and parents/guardians, and industry best Practices for children,
- creation of a special Group on an EU Code of Conduct for age-appropriate design, a key action under the BIK+ strategy including representatives from industry (trade associations), academia and civil society whose main task will be to draft a comprehensive code of conduct on age-appropriate design for industry to sign up to voluntarily.,
- etc.

The objective of this action remains fully relevant in order to meet the requirements of transparency on the part of the private sector and will be submitted for continuation in the 2023-2024 work plan with appropriate partners to conduct this project in a concerted approach with members authorities.

Sustainable Action

- **Increase the use and updating of CIRCABC platform of resources dedicated to DPAs**

Over the year 2022/2023, there has been several uploading campaigns resulting in the sharing on the online CIRCABC platform of a varied, innovative and inspiring offer of digital literacy tools aimed at educational practices for pupils, teachers/educators and parents: *Lesson plans, scenarios, manuals, booklets, practical guides, teaching factsheets, games, videos, comics, quizzes, MCQs, etc.*

In early July 2023, a renewed boosting campaign extended to all GPA members was circulated with the kind support of the GPA Secretariat. The objective was to maintain constant interaction with GPA members and encourage browsing and uploadings on the CIRCABC platform of resources by DPAs worldwide.



To facilitate the taking-up of the CIRCABC online tool for any new users, the specific designed training video tutorial (available in English with French subtitles) offered clear and concise demonstrations synchronized with proper images of the working group's website on how to access the platform, open individual accounts, ask for notification of new uploaded resources.

The platform plays a pivotal role in facilitating access to a large offer of resources for basic education, covering all grades and many diverse formats and subject areas related to data protection and privacy subjects.

It provides as well a “one-stop” dynamic sharing space for inspiring teaching courses, toolkits, manuals, leaflets and guidelines, case studies, and more entertainment materials.

As a result, the platform has compiled over 350 high-quality resources and weblinks indexed by target audience, reaching a global user base of 62 individuals from 40 countries. On the basis of the statistics relating to the number of visits, it can be reported that the number of consultations of uploaded documents amounted to an average of about 646 visits over four quarters under consideration. It is important to point out that the statistics of the platform do not count visited web links that are put online via CIRCABC.



Liaising with international organisations to benefit from active networking collaborations for the working group

The DEWG has been spotlighting several webinar events as well as national and international initiatives in line with the protection of children in the digital ecosystem.

- **The Nordic DPAs** set the protection of children’s data as a priority for 2022-2023 activities as provided in [the October 2022 Helsinki Declaration](#). The DPAs decided to create an informal working group related to children and online gaming to share information, starting with awareness-raising and thereafter identifying possibilities for joint guidance and enforcement actions. More information on plans and achievement have not been made available as of today.

- **The Italian Garante** on the occasion of a side event at the annual Spring Conference 2023 offered European DPAs colleagues the opportunity to present activities regarding children online protection on the topic of: ["Vulnerable individuals: Tools for online protection. Children and age verification"](#) and commented on the 2023 Italian SA’s decisions concerning IA Replika chatbot and TikTok. <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/9852214>.

- **The Moroccan DPA (CNDP)** launched on December, 9th 2022 the [“Koun3labal” platform](#) which is a virtual school and means “be watchful/aware”. It aims to raise awareness among children, teenagers and women about the dangers, risks, rights, means of protection, and available channels of recourse for the protection of their digital privacy, at both Moroccan and African levels. On that occasion, African DPAs and the DEWG’s coordinator were invited to support the initiative with other International and HR Organisations. The platform's innovative feature is the participation of several African contributors through a joint Committee of Contributor who will upload qualitative education resources.

- **The informal working group of DPAs on international age assurance**

An informal group of DPAs created in 2022 met 3 times online this year to discuss topics related to children's rights and age assurance on the invitation of the ICO (UK).

The attendees were invited to speak about their work and the development of legislation that can relate to both topics. The objective was to harmonise policy on age assurance measures and international standardisation approaches between countries where possible.

Several authorities, including the ICO, have presented interesting updates on technical and non-technical research into age assurance measures, and other updates have included online safety, parental controls, and the [euCONSENT project](#).

This group of DPAs will be happy to welcome any other interested GPA members in addition to the following authorities who attended the regular meetings: *ICO (UK); IDPC (Ireland); CNIL (France); AP (Netherlands); OPC (Canada); FTC (USA); OAIC (Australia); Datatilsynet (Norway) and outside hosts*



like the OCDE, the eSafety Commissioner (Australia) and the AVPA (Age Verification Providers Association).

The next meeting will be held in November 2022 online. Please contact the ICO for further details.

- **With the OECD**

- 1) Update 'Towards Digital Safety by Design for Children' ('safety-by-design') work**

The OECD Secretariat addressed as announced the development this year of a workstream on child safety-by-design that deals with specific issues related to data protection, education technologies (EdTech), age verification and other technological initiatives on child safety by design and artificial intelligence underpinned by the 2021 Recommendation on Children in the Digital Environment [[OECD/LEGAL/0389](#)] and the OECD Guidelines for Digital Service Providers [[C/MIN\(2021\)7/ADD1](#)].

The OECD issued a draft version of a safety-by-design report which is promoting a privacy by design approach to improve the ethics of informational interfaces and the exercise of children's rights in particular.

The DEWG members were invited to participate in the OECD Roundtable on Digital Safety by Design for Children on 7th of July; It brought together 170 participants around the world to review the policy landscape, and best practises for embedding digital safety-by-design. It was an excellent opportunity to update information in terms of how age assurance can be implemented to meet the best interests of the child, the range of age assurance technologies and solutions.

Feedback information will be shared with the DEWG and further information about the OECD's work on children in the digital environment is available [here](#).

- 2) OECD benchmarking Report on CSEA Transparency - Child Sexual Exploitation and Abuse Material Online**

The OECD published the report "[Transparency reporting on child sexual exploitation and abuse online](#)". The report provides an overview of the policies and procedures for addressing child sexual exploitation and abuse (CSEA) material across the global top-50 online content-sharing services. It is the first OECD report to benchmark CSEA policies and transparency reporting practices. The report reveals an urgent need for improved transparency on CSEA online.

To support efforts to combat CSEA, the OECD is building upon its expertise related to children in the in the digital environment.

- **With 5Rights Foundation, NGO**

The sustainable actions of 5Rights Foundation and its Digital Futures Commission (DFC) works developed over 2022/2023 in favour of the protection of children have raised points of convergence with the work of the DEWG in view of the importance of these subjects.

5Rights has continued its work in the EU, US, UK and internationally to advocate for a global standard for children's rights, safety and privacy in the digital by design and default. In September 2022,



5Rights published [Approaches to children’s data protection: A comparative international mapping](#). Earlier this year, 5Rights released its updated version of its game-changing report: [Disrupted Childhood: the cost of persuasive design](#).

Parallely this year, the Digital Futures Commission has worked on several initiatives, including a new essay collection [Education Data Futures](#), developing a [Glossary of terms relating to children’s digital lives](#) providing [guidance for innovators on Child Rights by Design](#) and creating a [Blueprint for Education Data Realising children’s best interests in digitised education](#).

- **With UNESCO**

The inaugural edition of [UNESCO Digital Learning Week](#) (4 to 7 September 2023) with a vision of “Steering technology for education” focused on governance, norms and standards, as well as pedagogical innovation related to the use of digital learning platforms and generative AI in education, Digital Learning Week aimed to foster inclusive and ethical practices while cultivating collaborative partnerships to achieve greater impact.

The following publications were launched during Digital Learning Week: [Guidance for generative AI in education and research](#), and [An ed-tech tragedy? Educational technologies and school closures in the time of COVID-19](#).

The Global Monitoring Education Report and 200 [PEER country profiles](#) on technology and education The [2023 GEM Report on technology and education](#) launched on 26 July 2023 explores three system-wide conditions (access to technology, governance regulation, and teacher preparation) that need to be met for any technology in education to reach its full potential.

- **With the Council of Europe**

The **Education Department** has launched a new kind of event EduTalks@Council of Europe as a series of moderated discussions and debates related directly to education or relevant to the education field. See in June 2023 : [Data Protection and the Right to Privacy in Education and in the face of AI](#).

The Council of Europe’s Committee of Ministers commissioned a report published in November 2022: [Artificial Intelligence and Education A critical view through the lens of human rights, democracy and the rule of law](#). It sets out to examine the connections between AI and education (AI&ED). The report concludes with a provisional needs analysis – the aim being to stimulate further critical debate by the Council of Europe’s member states and other stakeholders and to ensure that education systems respond both proactively and effectively to the numerous opportunities and challenges introduced by AI&ED.

- **With CIPL (Center for Information Policy Leadership)**

The Think Tank on Transatlantic Issues ([CIPL](#)) has been very active on [children’s data](#) since it issued a first policy paper last October 2022 [Protecting Children's Data Privacy Policy Paper I: International Issues and Compliance Challenges](#). It held several Roundtables and invited DPAs to participate in the debates with the stakeholders over 2022-2023 on key topics such as “Key Challenges in Children’s Online Privacy Protection and Compliance”, or “Age Assurance and Age Verification Tools”. The results from this roundtable can be accessed as [key take away](#).



- **With ITU**

As a follow up of its internationally recognised [Guidelines](#) on Child Online Protection (COP) updated in 2020, the International Telecommunication Union (ITU), which is the United Nations' specialised agency for information and communication technologies, has engaged this year in the development of **online self-paced trainings** for parents/legal carers, educators, policy-makers, ICT professionals and children 9 to 18 years old.

ITU aims at ensuring a collaborative process, which takes all relevant developments and pieces of work of the network in consideration and supports in resources which benefit the work of the community. An overview of the planned COP capacity building activities for 2022 to 2024 can be check [here](#).

Regulatory action:

The DEWG continues the work of regulatory monitoring examples of formal governmental initiatives or measures in relation to children's issues globally including children codes of conduct, age assurance, content moderation, parental controls, digital age limits, etc.,

In Canada:

The Consumer Privacy Protection Act is still being examined in committee in the House of Commons. The Privacy Commissioner of Canada (OPC) submitted a brief in April 2023 on the bill, which describes the measures to protect children's privacy. The recommendations [here](#).

In the United States:

After the adoption of the California Age Appropriate Design Code Bill in September 2022, the campaign has been actively pursued since January 2023 in several States in the USA in order to build a strong territorial base to influence draft legislation at federal level.

The dissemination of the Age Code based on the 5Rights model has led to progress in draft legislation in more than a dozen States (Maryland, New Mexico, Florida, Nevada, New Jersey, Utah, etc.).

For the US this mapping may be useful [here](#).

In Australia:

Australia passed 6 online safety codes (industry standards). Information [here](#).

In the UK:

The Online Safety Bill has passed on 19 September 2023 and is now ready to become law.

The bill “takes a zero-tolerance approach to protecting children and makes sure social media platforms are held responsible for the content they host”. Information [here](#)

Social media platforms will be expected among others to: *remove illegal content quickly or prevent it from appearing in the first place, including content promoting self-harm, enforce age limits and age-checking measures, prevent children from accessing harmful and age-inappropriate content, provide parents and children with clear and accessible ways to report problems online when they do arise.*



In Europe:

The Digital Services Act (DSA), The European Union's Digital Services Act (DSA) signed in October 2022 has officially gone into effect. Starting on August 25th, 2023, it aims to protect online users against illegal, dangerous and harmful content. puts restrictions on targeting ads to children. Information [here](#).

In France:

Adoption of the legislative acts aimed at reinforcing parental control over internet access methods.
Adoption of the law on digital majority at the age of 15 (definitively adopted in June): social media platforms will be required to verify the age and obtain parental consent for minors under 15.

The other texts are still under discussion in parliament:

- Guaranteeing respect for children's image rights;
- Combating cyberbullying;
- Preventing excessive exposure of children to screens.



Forward looking plan 2023-2025 for the Digital Education Working Group

A consultation process is underway with DPA members of the DEWG and will result in October 2023 in limited / or revised priority activities to be submitted for adoption within the 2023-2024 work plan. Other topics will then be considered as a vision for the upcoming years.

A priority for members of the DEWG would be to have more opportunities for exchanges with our international colleagues.

In-presence or online (hybrid) meetings would be arranged in order to discuss more general developments in the field of children's privacy or upcoming work.

Opportunities for collaboration on several topics would be explored as suggested in a non-exhaustive manner in the 2023-25 GPA strategic plan:

- Age verification remains an important issue and the DEWG members would be interested in any coordinated work on the subjects.
- Issues related to a coordination process with respective Regulators for Communication to produce codes of conduct including age verification processes might be of interest for our global GPA community.
- Continue to work together on the key issue of transparency and age-appropriate information requirements of services used by children (clear, simple, appealing) as a further step to move from theory to practice:
 - o Build on experimental approaches to involve social media platforms, children/youth groups, DPAs and civil society partners to make the platforms aware of the necessity to improve transparency.
 - o Prioritise a co-construction process of transparent and child-friendly interfaces for children adapted to the age and maturity in cooperation with them.
- Support parents with digital education and promote positive digital parenting with full understanding of the digital environment, the importance of autonomy, evolving capacities, dignity and safety of the child (with respect to the best interests of the child).
- Conduct further work on the impact of AI technologies in the education sector with regard to the risks for the rights of pupils/children and the importance of supporting core digital skills of the professionals based on democratic citizenship, human rights and ethical practice in their classrooms and throughout the school:
- The question of AI systems in education and issues at stake with regards to students' data and their rights could be subject to thinking and works towards:



- Strengthening the digital skills of educational actors in an increasingly connected school environment and in the context of the use of learning analytics technologies;
- Promoting the exercise of pupils/children's rights with regard to the AI systems offered by EdTech companies under the supervision of the educational authorities.

These AI topics in education could be explored in connection with the expertise of:

- Other GPA WGs (e.g. the Working Group on Ethics and Data Protection in AI, the Data Protection and Other Rights and Freedoms WG)
- International organisations promoting ethical digital transformation in Education such as UNESCO, the UNICEF or the Council of Europe.