



GPA

Global Privacy Assembly

Digital education Working group

Report – 31 July 2024

Chair authority: CNIL, France



Table of Contents

Executive Summary.....	3
Introduction.....	5
Working group activities.....	7
Regulatory actions.....	20
Forward looking plan 2024-2025.....	22
Conclusion	24
Appendix	25

1. CIRCABC – Folder tree



Executive Summary

Further to quite a satisfactory review of the past ten year of activities between October 2013 and 2023, the International Digital Education Working Group (DEWG) has renewed its commitment to the [Global Privacy Assembly Strategic plan 2023-2025](#) considering the challenges ahead due to the impact on children's rights and well-being of emerging technologies, as well as the digital transformation of education and the growing digitally-connected generation that requires a more privacy-friendly and trustworthy digital environment.

The work of the DEWG is integral to the GPA, supporting its strategic ambitions around leadership, collaboration, and fostering a global regulatory environment of high standards of data protection and privacy to the benefit of the children's rights.

The DEWG policy themes covered joint actions on four main GPA objectives:

- Strengthening education in the digital environment by developing specific digital resources and awareness campaigns for children adapted to their maturity and progressive empowerment;
- Undertaking accompanying initiatives to facilitate information and access to the exercise of the rights of children and parents in a setting that respects their privacy and best interests;
- Assessing the need and making concrete proposals to ensure that education professionals benefit from updated awareness-raising and training on data protection and the exercise of rights and responsibilities in their daily digital citizenship practices.
- Organising further collaborations with international institutional actors and associations committed to the promotion of children's rights in the digital environment to produce joint actions, namely, influence policy makers and digital service providers to put in place transparent privacy policies and compliant educational settings.

This year's activities in the DEWG's work plan 2023-2024 covered six main workstreams resulting from a large consultation and input process with DPA members of the DEWG in October 2023.

The DEWG is pleased to present the report to the Global Privacy Assembly as an update on progress during this year of operation.

- The realisation a joint action that **created a multi-language booklet** to promote awareness resources, campaigns and other innovative initiatives about the importance of the personal data and the need to protect it has proved remarkable. It has been designed to increase the visibility of a dynamic community of GPA regulators sharing best practice and multiplying messages on the rights and duties of digital citizens to children, parents, educators and the general public.



- The lessons learned from the first key findings and other highlights of the 2023 **“Teachers’ survey to explore their relationship to personal data protection and digital citizenship”** carried out from a global panel of 840 school teachers in primary and secondary schools by a group of 5 countries of the DEWG, are critical. They enhanced the urgent need to engage with policymakers and other relevant stakeholders in the reshaping of the future of education by supporting educators in keeping up with technological advancement and related pedagogical approaches so that they can better guide students in navigating the digital world safely and responsibly.
- The DEWG has started to conduct further reflection and work **on the impact of AI technologies in the education sector** focussing on the risks for the rights of pupils/children and the importance of supporting the digital skills of the professionals. Due to the lack of robust national or global regulation addressing human and child rights, and of oversight of the EdTech industry, children’s privacy, safety and well-being are at risk with the introduction of AI tools into classrooms.
- Opportunities for collaboration on the sensitive topic of **data governance in EdTech** have been explored and are promising based on a review of related initiatives and identified partners.
- Another central focus of the implementation of this action plan was **to make it easier for families to understand the digital environment** in both children’s and parents’ relationship to the current digital culture. The dedicated Task Force launched a consultation with all GPA members and observers to identify parents’ concerns regarding digital technology and to learn about the campaigns, initiatives, key messages and advice that data protection authorities or other agencies (public authorities, schools, NGOs, other associations supporting families, the private sector, or media, etc.) have put in place to help families become more digitally literate.
- Over the year, the DEWG has continued to move into action on the topic of **Age verification** in collaboration with existing international working groups and other stakeholders concerned. Interested members were invited to join online events to learn from each other’s experiences in this field of age assurance seeking for harmonise policy approaches, where possible, to ensure people, and particularly children, are protected online.

The Group was expanded in 2024 and now holds 87 Data protection authorities and observers as active members.

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



Name of Members Authorities by Region (Europe, Africa, North and Latin America Asia-Pacific) (87):

Europe (50) : Albania, Andorra, Austria, Belgium, Bosnia-Herzegovina, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, Germany (and 7 regional authorities), Georgia, Gibraltar, Greece, Guernsey, 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, UNICEF.

Introduction

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

The end of the year 2023 was marked by the 10th Anniversary of the establishment of our international Digital Education Working Group created by the GPA resolution in 2013 "[A Digital Education for All](#)".

The CNIL having acted as chair and coordinator, shared on that occasion with all members a review of activities that have been carried out jointly over the past decade.

Key initiatives were listed maximizing the voice and influence of the GPA such as the adoption of 4 resolutions in the field of education and of children's rights protection¹ or contributions to key international consultations². Among them, the [UN General Comment 25 on children's rights in the digital environment](#) as well as the High-level Roundtable at the OECD to discuss how governments could take action and learn about best policy practices to implement the [Recommendation on Children in the Digital Environment](#).

¹2013: [Resolution on Digital Education for All](#)

2016: [Resolution for the Adoption of an International Competency Framework on Privacy Education](#)

2018: [Resolution on e-learning platforms](#)

2021: [Resolution on Children's Digital Rights](#)

² [The DEWG adopted a joint contribution](#)



Regular consultations and mapping exercises (15 surveys resulting in annual progress reports) were carried out on various topics. These consultations were aimed at assessing the implementation of the adopted resolutions, communicating on best practices to contribute to capacity building among members but also evaluating priority concerns in relation to the various targets such as children, teenagers, teachers, parents, education authorities, governments, industry sector.

This collective intelligence comprised of 87 members including observers such as international organisations helps to learn from each other and spread an inspiring culture of best practice in digital education among DPA members.

The creation of the CIRCABC platform of resources has been regularly refreshed and updated with the support of DPA members. It continues to act as a pooling online library offering thousands of innovative ready-to-use materials for students, teachers, and parents in various languages.

Further to a satisfactory review of these past activities, the DEWG has renewed its commitment to the [Global Privacy Assembly Strategic plan 2023-2025](#) considering the challenges ahead due to the impact on children's rights and well-being of emerging technologies, as well as the digital transformation of education and the growing digitally-connected generation that requires a more privacy-friendly and trustworthy digital environment.

The emergence of AI in education raised new data protection issues, among others. Teachers and other educational staff are crucial for any digital transformation to happen. They need to have the confidence and competence to use digital tools and resources as part of their teaching and be supported to acquire the pedagogical and digital competences to do so.

Progress has been made on this priority topic of its work Plan, in establishing orientations from the key findings of its 2023 Teachers' survey with the aim to upgrade educators' level in data protection, privacy and citizenship education.

Moreover, additional focus has been raised on the privacy implications of EdTech which put children's privacy, safety and well-being at risk due to a lack of oversight of the expanding EdTech industry.

As reviewed by the DEWG, data governance for EdTech has been set high on the agenda for many key stakeholders this year. Many international guidelines and reports on technology and education, highlighted current gaps in data protection, privacy, governance and security with specific reference to learners as part of the broader digital divide.

This year's report gives an overview of the DEWG's activities, developments and achievements under each thematic area of the ambitious action plan adopted in October 2023.



Working Group Activities

Regarding the detailed 2023-2024 work plan, progress has been achieved in some of the six areas through the continuous involvement of members divided in thematic sub-groups created end of January 2024.

Several new action items and related activities to be explored are to start in the second semester of 2024 based on the expertise of strategic partnerships of international organisations.

These activities were mainly focused on capacity building for GPA members. They **covered six main workstreams, the follow-up of one action started in 2022-2023 and a sustainable activity as a common line.**

Extended action started in 2023

- **Creating a multi-language booklet of awareness raising activities with children, parents, educators and the general public about the importance of the personal data and the need to protect it**

A survey was conducted in 2022-2023 as a pro-active common line gathering GPA members' "success stories" promoted during - but not limited to - specific events such as the International Children's Rights Day (20/11), Data Protection Day (28/01), Safer Internet Day (07/02) and the Data Protection Week within the APPA area (*in May*).

In the end, 27 DPAs pooled relevant and promising national and regional returns ranging from *educational shows with public libraries and film forums, escape games with specific missions on privacy issues, to school competitions, undertaking of surveys aimed 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 DEWG proposed to put together all the pieces of work and create **a specific booklet** divided into several sections presenting a series of physical events, activities making use of social networks, running of surveys, competitions and development of platforms. All the content refers to a specific targeted audience ranging from children, teenagers, parents, educators and the general public and to weblinks of the various projects to be explored more in detail.

The booklet was formatted with the support of the DEWG coordinator, the GPA secretariat and design team. The final layout looks very compelling with illustrated resources thanks to the added value and quality of the work done by the creative GPA team. The Digital Education Working Group Booklet would represent a complementary resource to continue promoting the activities of great value to many users.



Once validated by individual DPA members and the designer, the brochure will be made available on the GPA website and translated into French and Spanish.

Following the publication of this booklet as a multi-language resource in early autumn 2024, the DEWG members will be invited to contribute to its distribution within their respective networks towards the educational community.

Such an interesting pooling of innovative events, materials and micro-sites for children & adolescents covering a wide range of topics on the risks and rights associated with the Internet is also worth being promoted via official media, websites and distribution can be amplified by international networks.

This joint initiative will increase the visibility of a dynamic community of GPA regulators sharing best practice and multiplying messages on the rights and duties of digital citizens.

Action 1

• Strengthen our engagement with schools and teachers

This sub-group is made up of the steering group that carried out the teachers' survey in 2023 (France, Morocco, Gibraltar, Catalonia and Malta) and was joined by 2 other DPAs (Argentina & Mali).

As agreed at the 45th Annual Meeting, the central focus of this action was to work on the main trends and major findings of *"the Teachers' survey to explore their relationship to personal data protection and digital citizenship"* until the completion of the final report and publication of recommendations in 2024.

From the preliminary report established on the first quarter of 2024, the following trends appeared from the responses collected from a global panel of 840 school teachers in primary and secondary schools representing the European countries (France, Catalonia, Gibraltar and Malta) and Africa (Morocco):

- It is apparent from the findings of the analysis that if teachers wish to raise pupils' awareness of the issues of personal data protection and digital citizenship, it comes up against a first obstacle, **which is the lack of training (40% to 81%)**.

- Nearly half of respondents said that they have not been trained at all in personal data protection and digital citizenship.

But, based on evidence collected from the views of these teachers, **there is also a lack of time in their curriculum:**

- Teachers pointed out that the subjects of personal data protection and digital citizenship are not part of the school curriculum.



- Responses varied according to the discipline taught whether they are teachers in the technological or humanities fields. As a matter of fact, this is also connected to the fact that ICT teachers link it more to technological and security subjects whereas in the field of humanities they work on an approximation of data protection topics with more "sociological" disciplines linked to values such as freedom, the free development of personality or dignity which are not so worked upon.

- Nevertheless, on average, **three in ten teachers** decide to deal with the issues related to personal data protection and digital citizenship when they are given the opportunity to react more widely to a current event or because they are dealing with a related subject as part of a course.

But without being able to quantify precisely the duration dedicated to these topics over semesters or on an annual basis.

As more positive viewpoints were received, there is a real appetite and high expectation among teachers to get training **from outside the school**, given the lack of effective initial or vocational training so far now **about** data protection and digital citizenship.

- Teachers expressed keen interest in getting support and expertise from stakeholders outside the education system, in particular from institutional organisations, including **structures approved by the Ministry of Education** as first request (48% to 63%), and as second ranking, **data protection authorities** who have an important role to play (31% to 59%) as reliable and experts' stakeholders.

- As a matter of fact, a large proportion of teachers do make great effort as self-training and use online resources as well as physical resources to update their knowledge. But there appears to **be a significant lack of awareness of resources** among both primary and secondary school teachers for raising awareness in their lesson plans.

- Most respondents across all schools indicated they either did not know about the resources well enough or didn't know where to find them and how to have access to some of the specific materials mentioned in the survey by each DPA.

These findings suggested a need for improved circulation of information about available resources and training for teachers on how to effectively incorporate them into their practices.

The lessons learned from these key findings of the survey and other highlights from the completed report and conclusions will be used to draft joint recommendations that will be discussed within the whole DEWG in the last quarter of 2024 to enhance, among others:

- The perspectives of teachers' training,
- Privacy and digital citizenship education within the national or regional curricula,



- A more qualitative use by our DPAs of schools' networks and collaborative work with departments for education.

The time schedule to produce the final report and recommendations has been adjusted in 2024.

The Task Force intends to maximize opportunities for peer learning within the DEWG to reach a strategic communication plan based on the delivery of the global results of the international survey and recommendations prepared by members.

This could involve engaging outside the GPA to draw specific attention on the value of the findings to first, ensure that digital literacy is taught in schools as part of the basic citizenship education curricula from the earliest years throughout their schooling and beyond. And second, to influence policymakers and relevant stakeholders in the shaping of the future of education by inevitably supporting educators to keep up with technological advancement and related pedagogical approaches so that they can better guide students in navigating the digital world safely and responsibly.

Action 2

- **Support parents in developing their digital education skills and promote positive digital parenting**

This key output has been developed by the 7 DPA members of the Task Force: CNIL (France); CPVP (Canada); DPC (Ireland); Garante (Italy); GRA (Gibraltar); CNDP (Morocco); AAIP (Argentina)

Since digital technology is very present at home, in the family and among friends, parents have a key role to play in educating their children about digital citizenship. Their example as adult best role models for young people is important and constructive when it comes to using digital technology.

However, issues such as parents' screen time, practices such as *sharenting* (publicising content about their children images, videos about their children on social networking sites), or parental control that does not respect their children's privacy or intimacy can come up.

Therefore, the central focus of this action was to make it easier for families to understand the digital environment in both children's and parents' relationship to the current digital culture. As highlighted in many international guidelines³, it is of utmost importance to understand the child's need for autonomy, evolving capacities, as well as dignity and safety in the digital environment, while respecting their best interests and privacy.

³ [General Comment No. 25 in relation to the Children's Rights in the Digital Environment.](#)



With regards to the implementation of this action plan aimed at supporting the ‘digital parenting’ role, the Task Force convened to launch a consultation with all GPA members and observers and provided a background note on the topic.

The questionnaire available in appendix is to be completed online on the Office of the Privacy Commissioner of Canada website at https://services.priv.gc.ca/q-s/allez-qo/dewq_enq before September 9, 2024.

The purpose of the questionnaire is to identify parents’ concerns regarding digital technology and learn about the *campaigns, initiatives, prior consultation, assessment or performance indicators, partnering organisations, resources developed, key messages and advice* that data protection authorities or other agencies (public authorities, schools, NGOs, other associations supporting families, the private sector, or media, etc.) have implemented to help families become more digitally literate.

The next steps in the form of further output from the global analysis are to draw up a summary of the overall results and prepare common key, clear, coherent and realistic messages intended for parents and public authorities while avoiding an approach based only on prohibitions and injunctions, which has proven ineffective.

With this in mind, our DPAs could take part in these awareness-raising initiatives alongside organisations liaising with our institutions to pass on key messages in various forms that could be used in their respective communication campaigns and initiatives.

Moreover, a strong communication campaign could also be jointly created, for example to celebrate [the Twentieth anniversary of the United Nations' International Year of the Family \(IYF\) in 2024.](#)

As the first public phase of the project emerged in July 2024, the first deliverables will be made available after the GPA Closed Session in October and rolled out as announced by the end of 2024.

Action 3

- **Monitor progress in the digital inclusion of children**

To approach this topic in a best way, a stocktaking exercise of good practice to advance inclusion in digital education had been suggested. INFOEM Data Protection Authority of the State of Mexico has volunteered to take part in this project.

Due to resource allocation on a number of other work packages, no progress has been made on this topic this year. The DEWG will carry out a review of priorities with the DEWG members early October 2024. On that occasion, it will be discussed whether the exploration of this important topic can be rescheduled and if a call for DPA resource or any other partner expertise is worth being launched.



The following objectives and upcoming activities will also be considered: monitoring, information sharing, conducting a survey, or creation of a compilation of related content.

Action 4

• Explore AI systems in education regarding students' rights over their data

The dedicated Task Force is made up of four DPAs: CNIL (France); NAIH (Hungary); APDCAT (Catalonia); CNDP (Morocco).

The first 2024 semester was dedicated to reflect further on how best to approach the impact of AI systems in education and with regards to pupils' data protection and privacy rights.

The aim is to compile an international literature review and map AI system in educational from the perspective of the rights of the child. Some collective research presented the views of young people on AI and their concerns regarding its impact on the protection of their rights.

• Stream 1 of the action capitalized on inventorying literature review:

In fact, while there are initiatives to regulate AI in Europe and elsewhere in the world, the literature reviews consulted so far have revealed the lack of frameworks that specifically address key features of education or human rights⁴, needs and interests of children, young learners and their teachers⁵.

Regarding the perspective gathered on children's views on AI:

- In the UK, [the Alan Turing Institute](#) has led research into children's perceptions of AI with the Scottish AI Alliance and the Children's Parliament.
- Children's views have been collected by the [EU Commission's JRC](#).
- Canadian research by MediaSmart has facilitated focus groups with 13 to 17 year olds to better grasp how young Canadians understand the relationship between artificial intelligence (AI), algorithms, privacy and data protection [Algorithm savvy: Young Canadians discuss artificial intelligence and privacy](#).

⁴ The Council of Europe carried out a survey in September-October 2022 at member states to better understand national initiatives related to AI and education. The survey report "State of Artificial Intelligence and education across Europe" found that most of the responding member states have established or were in the process of establishing general policies and strategies for the use of AI. However, AI and education was not addressed as a special or distinct case, due to the absence of specific policies.

See the infographic <https://rm.coe.int/the-state-of-artificial-intelligence-in-education-infographic-/1680aef139>

See the highlights <https://rm.coe.int/artificial-intelligence-and-education-post-conference-summary/1680aae327>

⁵ [The Recommendation on Education for Digital Citizenship adopted by the Committee of Ministers of the Council of Europe in 2019](#) looked in particular at AI systems used in education, calling for awareness of the strengths, weaknesses, benefits and challenges of using AI in learning and schools. The need to protect children's privacy in digital environments clearly results from it.



The Division for the Rights of the Child of the Council of Europe is expected to publish in 2024:

- A mapping study of legal frameworks that addresses AI in the context of children's rights.
 - The [Committee of Artificial Intelligence's](#) work on a methodology for assessing the risks and impact of artificial intelligence systems from the point of view of human rights, democracy and the rule of law.
- **Stream 2 of the action is expected to take place with DPAs and stakeholders' contribution**

The objectives set by the Task Force:

- Identify how the use of AI is promoted in a school setting and whether it leads to respectful behaviour with regards to students' personal data and their rights.
- Take an interest in how we talk to children and young people about AI in an educational context.

Therefore, the proposed course of action which has been suggested by members of the task force as part of the DEWG mandate is to explore:

- What is being done in terms of AI guidance and practices in education in respective countries.
- What actions, surveys, tools and recommendations are published as a basis to propose activities with AI in the classroom.

Operational information on the work, methodology and deliverables of the Group have commenced and will be presented in more detail in the period to come.

After a brief exchange with the GPA Working Group on Ethics and Data Protection in AI (AIWG), it was noted that the AIWG's work programme did not include any topics related to education so far. However, the DEWG could further explore whether this topic could be an area for cooperation with the GPA AIWG who could launch a call for expertise among their GPA members.

Action 5

- **Collaborate on Age Assurance**

The DEWG has been facilitating the participation of GPA members in international working groups and other events gathering DPAs, experts, policy-makers and civil society working on children's rights.

The meetings aimed at pinpointing the state of play, key principles and existing technical solutions that provide the capacity to be preserve privacy, to understand and support age assurance solutions that can both protect and empower children in a digital environment.

Data Protection Authorities having expressed an interest in this topic and being also part of the International Age Assurance Working Group were kindly invited to join several online events.



All public documents presented by stakeholders from the various meetings and events are to be uploaded on CIRCABC platform. The online library dedicated to GPA members opened in late June a new section dedicated to the issue of Age Verification offering classification within the tree-folder as follows:

- a. Reports from international working groups (*IAAWG; EU; ISO; Other international actors*)
- b. Research, surveys, consultations related to age verification (*At national level; At international level*)
- c. Statements on age verification (*national / European / international levels*)

With the International Age Assurance Working Group (IAAWG):

The International Age Assurance Working Group was formed in 2022 by the ICO. It aims to:

- be a global forum for DPAs, online safety regulators, and international organisations to learn from each other's experiences in the field of age assurance; and
- harmonise policy approaches, where possible, to ensure people, and particularly children, are protected online.

The Working Group held three online meetings this year. Members of the group provided updates on national and international legal and policy developments, as well as recent enforcement actions. Some of the topics discussed included ISO standards on age assurance systems, user profiling, and age verification systems.

Members of the IAAWG also worked on a **joint statement** on a common approach to age assurance. The Joint Statement is intended as a guide to industry of some key minimum standards on age assurance practice as it relates to data protection and privacy.

The Working Group welcomed new members interested in joining the meetings and currently includes:

AAIP (Argentina), OAIC (Australia), Belgian DPA, OPC (Canada), Ontario IPC (Canada), APDCAT (Catalonia), Cyprus DPA, CNIL (France), BfDI (Germany), GRA (Gibraltar), PCPD (Hong Kong), NAIH (Hungary), IDPC (Ireland), Garante (Italy), PPC (Japan), INFOEM (Mexico), CNPD (Morocco), AP (Netherlands), Datatilsynet (Norway), NPC (Philippines), UODO (Poland), CNPD (Portugal), PDPC (Singapore), IPRS (Slovenia), AEPD (Spain) ICO (UK), FTC (USA). Other organisations such as the OECD, the eSafety Commissioner (Australia), Ofcom (UK) are also part of the group.

The next two meetings will be held online in September 2024 and February 2025. Please contact the [ICO](#) for further information.

With other international organisations

- **OECD**

Following their work on children in the digital environment, OECD has been carrying out comprehensive research on and analysis of the issue of age assurance which is effectively called for in the [OECD Recommendation on Children in the Digital Environment](#) as well as in its accompanying Guidelines for Digital Service Providers.



Based on a preliminary internal proposal that provided an overview of age assurance and a plan for potential future work, the next steps on children’s safety and well-being online could lead to the development of OECD policy guidance to help improve consistency and certainty in approaches across jurisdictions. Interesting options depending on capacity and interest are on the table ranging from analysis of the current legal and policy landscape to approaches of the age assurance issue by stakeholders.

- **The EU Commission**

In early 2024, the Commission set up a taskforce on age verification with Member States, the Board and the European Regulators Group for Audiovisual Media Services, with the aim of discussing and supporting the development of an EU-wide approach to age verification. This work will now continue under the Digital Services Act Board, in the Protection of Minors Working Group since there is increasing focus on the need for effective and privacy friendly age verification tools.

See https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14054-Report-on-the-General-Data-Protection-Regulation_en

- **5Rights Foundation and the European Parliament**

5Rights Foundation and the Child Rights Intergroup of the European Parliament co-hosted in April 2024 an event called *Demystifying Age Assurance for Children’s Rights* to discuss the path forward towards privacy protection.

The discussion aimed at developing a shared understanding among key members of the intergroup as well as organisations of the child rights community on how age-assurance can contribute to the protection and promotion of children’s rights online, in full respect of the rights to privacy and data protection of all users.

[The EU Intergroup’s work is based on the Child Rights Manifesto](#) drawn up by a coalition of child-focused organisations working towards the realisation of the EU’s legal and policy commitments to promote and protect children’s rights, and obligations set out in the Convention on the Rights of the Child.

The 2-hour event was recorded and is available with this [link](#). The DEWG drafted a summary report uploaded on CIRCABC platform together with the PowerPoint presentation of the Spanish AEPD.

Initiatives on the national level:

- **The Spanish Data Protection Agency (AEPD)**

In December 2024, the Spanish Data Protection Agency organized an event in Madrid to celebrate its 30th anniversary and to present the "**Age Verification Criteria**" developed by the AEPD. These criteria published under the form of [Decalogue principles](#) are aimed to prevent access by minors to inappropriate content, while that allow the anonymity of Internet browsing for the adult population to be guaranteed. The age verification system that had already been tested with the main internet browsers, was due to be put into operation before the summer of 2024. On 1 July 2024, the Spanish Ministry of Digital Transformation launched "[technical specifications for age verification](#)", with an app allowing users to obtain tokens proving they are over 18 that can be used to access pornography sites.



- **The OPC Canada age assurance consultation - call for comments: 10 June – 10 September 2024**

The Office of the Privacy Commissioner of Canada (OPC) launched on June 10, 2024 **an exploratory consultation on privacy and age assurance**. The consultation period is **open to September 10, 2024** and any feedback from a broad range of interested parties in the privacy and age-assurance communities and beyond, is welcome.

[Age assurance exploratory consultation – call for comments - Office of the Privacy Commissioner of Canada](#)

Action 6

- **Urge for EdTech transparency:**

As part of the activities in line with the governance of EdTech, the DEWG focused so far on monitoring frameworks published by multi-stakeholders as well as experimental collaboration involving education authorities, regulators, industry, international organisations, civil society or children's focus groups. The next steps planned will discuss what has already been doing at the level of DPAs or Ministries of Education, or what is being discussed by teachers on governance of EdTech, and what DPA members views are on priority action on this issue.

Stream 1 of the action: monitoring initiatives and participation in events on EdTech

Focusing on a monitoring review, the purpose was to first take stock of local initiatives, European and international events involving DPAs in relation to data governance, ethics and transparency in EdTech. It covered as well a preliminary desk review of relevant publications which will be further prepared under the form of a *Landscape analysis of the state of data in EdTech, and framework for future analysis*, to be completed by the UNICEF partnering organisation.

Data governance for EdTech has been set high on the agenda for many key stakeholders this year.

Significant part of discussion having started in the ecosystem are revolving around establishing partnerships in education between public actors and EdTech. Some paths are also exploring opportunities and challenges related to the development of quality assurance of EdTech tools.

- In October 2023 the IPC Ontario published a [“Digital Privacy Charter for Ontario Schools”](#).

The Charter was provided in consultation with educators, educational institutions, and youth and parents advocates. It consists of twelve high-level commitments that codify current and emerging privacy best practices, many of which are grounded in statutory requirements.

The commitments are intended to support students in the digital environment by:

- promoting strong privacy protections in digital education tools and services used by schools
- encouraging ongoing learning about privacy in the digital environment
- empowering students to understand and exercise their privacy and access rights.



While the Charter's commitments are voluntary, school boards across Ontario can use the Charter to demonstrate a strong, province-wide promise to protect students' digital privacy, support accountability and transparency, and strengthen trust in Ontario's schools.

<https://www.ipc.on.ca/wp-content/uploads/2023/10/sp00001e-digital-privacy-charter-11x17-1.pdf>

At the UN level, UNESCO and UNICEF have been raising concerns about data governance for EdTech for the last several years.

- In 2024, the [Global Education Coalition](#) members under the aegis of UNESCO gave the voice, especially to the regulatory authorities in a panel session "[Towards an international alliance of EdTech coalitions for SDG 4: Global challenges, national resonance](#)".

During the workshop, DPAs represented by the French CNIL, highlighted the need to build trust and compliance between governments and EdTech. An overview of the outcomes of the discussion [here](#) on the themes of trust, evidence, partnerships/alliances, and quality assurance.

The Council of Europe as has also been actively forging pathways to enhance engagement with the private and civil sectors to the benefit of a unified vision for digital education to safeguard human rights, democracy, the rule of law, and, fundamentally, the best interests of learners.

- In light of Council of Europe's work in relation to the [Guidelines to support equitable partnerships between education institutions and the private sector](#), a public session took place in Paris in November 2023 with the French Ministry of Education and the CNIL.

The objective was to promote a structured and ethical dialogue between all stakeholders in education. Public actors, regulators and EdTech [showcased sense-making practices](#) that illustrated the ethical aspects which support existing partnerships between educational institutions and the private sector.

- The European Schoolnet Network held an event at the [School Innovation Forum](#) in June 2024 in Luxembourg on the general theme this year "**EdTech in schools: from promises to reality**".

The event brought together education leaders from over 30 European countries (representing national ministries of education, the European Commission, school directors, research bodies, universities and technology companies active in the field of education). The CNIL co-hosted a workshop [on Education and public-private partnerships](#). This session focused on the role of companies active in the field of education and how they affect education processes and methods across Europe and beyond. It explored the opportunities and challenges that such reality creates and their impact in schools' and teachers' practices. See [summary of the three sessions and key takeaways](#).

- UNICEF organised and moderated a panel on [Children's Rights, Data and EdTech](#) at the Privacy Symposium in June 2024 in Venice.

As part of on the protection of children online and EdTech, this panel considered the respective roles of independent data protection regulators, government departments such as ministries of education, and the private sector, in relation to EdTech. The CNIL, the Office of the Privacy Commissioner in



Canada and Microsoft were asked as panellists how they could work together to deliver on maximising the benefits of innovative EdTech for children’s education, whilst also prioritising children’s rights to privacy, freedom of expression, and self-determination. The Data protection authorities reiterated the importance of the [2018 GPA Resolution on e-platforms](#), whose various recommendations addressing separately to each of the stakeholders, education authorities and providers were still relevant today. They also stressed the importance of transparency, imposing Privacy by default to protect children's data and rights and always keeping the best interest of the child in mind.

- **Stream 2: actions to take place with DPAs and stakeholders’ contribution**

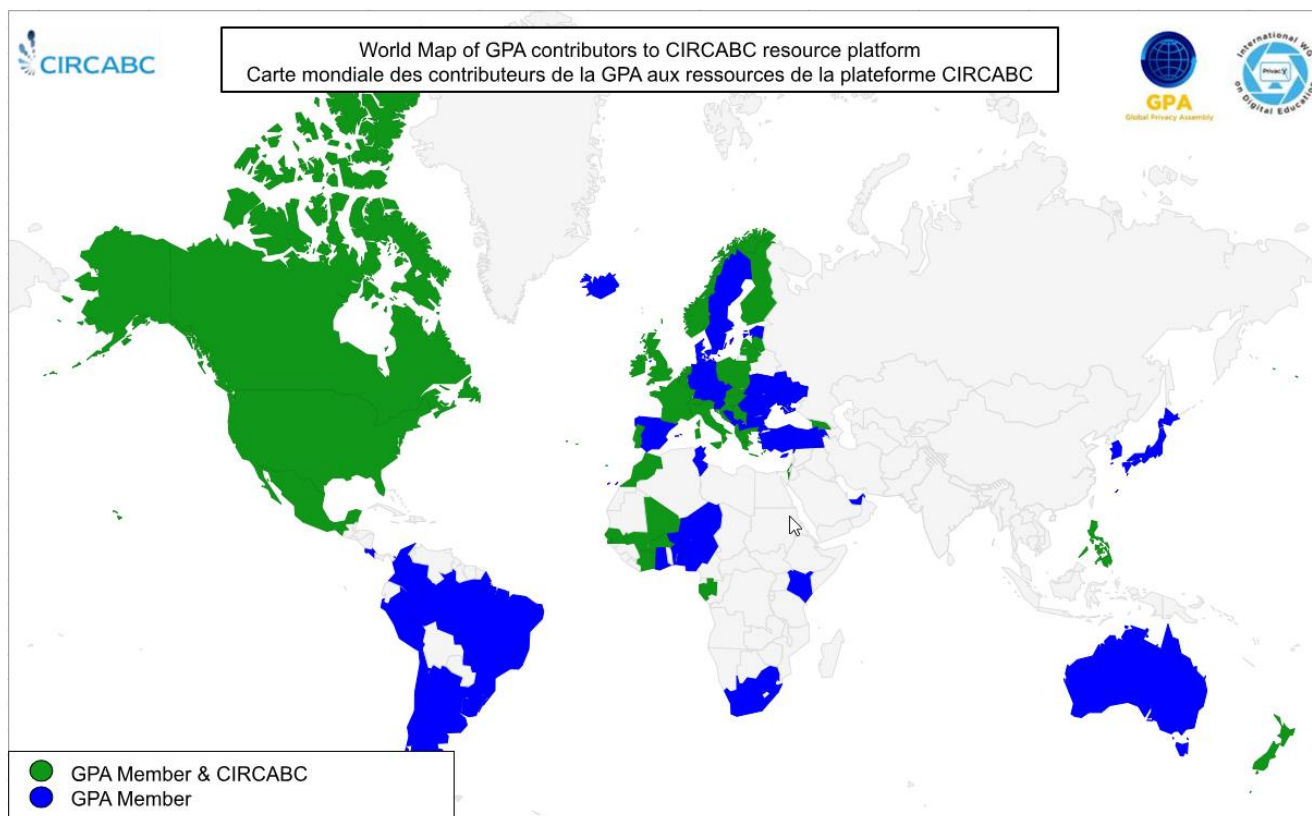
UNICEF is seeking to engage with the DPA members of the GPA DEWG on the **Emerging Technologies and Children project**, which is a two-year project financed by the Government of Finland. This joint initiative will explore the complex interactions between emerging technologies, including financial technologies (Fintech), educational technologies (EdTech), neurotechnologies (NeuroTech), and data governance, and their impact on children's rights and well-being.

UNICEF confirmed its willingness to engage with the GPA/ DEWG in particular **on data governance in EdTech**. In line with it, a short report of the current state of data governance in EdTech will be developed, especially in relation to privacy, data protection, sharing and accountability, by the end of 2024. UNICEF will then work with experts in 2025 to identify promising practices whereby ministries of education or data protection regulators have put forward with governance models for EdTech, or where industry has come up with self-regulatory frameworks for data governance in EdTech.

The DEWG will hold **an online meeting on 3 October 2024 on the Governance and practices of EdTech** in relation to data transparency in schools as the main focus. Together with UNICEF, the DEWG will invite DPAs as well as other partnering organisation working closely on this issue to provide input like the Council of Europe, OECD, UNESCO and 5Rights Foundation.

Sustainable Action

- **Extension of the CIRCABC platform and pooling of resources dedicated to GPA members**



List of CIRCABC Members in July 2024: 40 DPAs

Albania; Belgium; Burkina Faso; Canada; Catalonia; Croatia; Finland; France; Gabon; Georgia; Gibraltar; Greece; Hong Kong; Hungary; Ireland; Israel; Italy; Ivory Coast; Latvia; Lithuania; Luxembourg; Mali; Mauritius; Mexico (INAI); Mexico (INFOEM); Morocco; Netherlands; New Zealand; Norway; Ontario; Philippines; Poland; Portugal; San Marino; Serbia; Senegal; Slovakia; Switzerland; United Kingdom; USA.

Global GPA users: 65

Until June 2024, the online library was enriched with some more 30 resources (*lesson plans, scenarios, booklets, practical guides, posters, quizzes, MCQs and surveys dedicated to children and teenagers*), bringing the total of input to over 400 tools available in several languages.

In July 2024, a boosting campaign extended to all GPA members was circulated due to the importance of keeping on constant interaction with GPA members and encouraging browsing and uploadings new resources. As a matter of fact, many new quality awareness-raising resources flagged up by DPAs in the [2024 GPA Awards applications](#) as well as in the 2023 booklet deem to be indexed on the CIRCABC platform.

New developments: *(see annex)*



- The tree folder has been extended to include 3 new categories:
 - J. CYBERSECURITY**
 - a. Awareness-raising resources and activities for young people, students and parents
 - K. DATA PROTECTION AWARENESS CAMPAIGNS FOR YOUNG ATHLETICS**
 - a. Resources, guides
 - L. CONTRIBUTIONS TO AGE VERIFICATION**
 - a. Reports from international working groups (IAAWG; EU; ISO; Other international actors)
 - b. Research, surveys, consultations related to age verification (At national level; At international level)
 - c. Statements on age verification (national / European / international levels)
- A standardised Excel document has been provided to help members prepare their downloads. This way, each DPA can better organise the internal mobilisation and keep track of new content addressing specific targets to be easily copied/pasted and put online in the appropriate thematic folders of the CIRCABC platform.

The CNIL and the CNDP of Luxembourg who supervise the online library pointed out that registration and access is open to all GPA members and observers including any collaborator that can be given access profile as "Author", "Contributor" or "Access".

New registrations and contribution are welcome at any time. In September 2024, an inventory of the consolidated directory will be published together with statistics on visits and uploads.

Regulatory actions:

The DEWG is conducting a monitoring exercise to update the mapping of governmental initiatives, measures, recommendations and guidelines in relation to children's issues globally including children codes of conduct, content moderation, etc.

In Canada:

In October 2023, the Federal, provincial, and territorial information and privacy authorities adopted a joint resolution calling on governments to do more to protect the privacy rights of young people. For young people, the resolution focuses on the responsibility of organizations across all sectors to actively safeguard young people's data through responsible measures, including minimized tracking, regulated data sharing, and stringent control over commercial advertising. It also calls on organizations to safeguard their rights to access, correction, and appeal regarding personal data. The recommendation: [Putting best interests of young people at the forefront of privacy and access to personal information](#)



In the UK: UK Regulatory developments

The ICO has published its [Children's Code Strategy](#). The Strategy highlights the regulatory actions the ICO has taken since the Children's Code was rolled out in September 2021 and it provides an overview of the next steps ICO intends to take in supervising the implementation of the Children's Code.

The Online Safety Act passed into law on 26 October 2023. The Act requires platforms to prevent children from accessing harmful and age-inappropriate content and to provide parents and children with clear and accessible ways to report problems online when they do arise.

Ofcom, the UK's communications services regulator, is the appointed independent regulator of the Act. ICO and Ofcom are working closely together to ensure there is a consistent regulatory approach to cross-cutting online safety and data protection issues. They have published a [Joint Statement on Collaboration on the Regulation of Online Services](#) to explain their collaboration method.

In Europe (EU):

The European Union's Digital Services Act ([DSA](#)) which has officially gone into effect on August 25th, 2023 introduced new rules which aim to create a fairer and safer online world. These rules address issues such as cyberbullying, illegal content, the simplification of terms and conditions, and many others. The European Commission published a booklet which explains in simple terms the measures put in place to protect children and young people under the age of 18.

[The booklet](#) can be download in the several languages from the EU Publications website.

At the Council of Europe's level:

On September 29, 2023 at the [26th session of the Council of Europe Standing Conference of Ministers of Education](#), the Ministers of Education set new priorities:

- DCEY2025: The year 2025 was declared as [the European Year of Digital Citizenship Education](#). The European Year will enhance the visibility and impact of Digital Citizenship Education even further and in cooperation with the 46 member states. It provides a strategic platform for key stakeholders across countries public, private and civil sectors to collaborate, set common goals, and exchange sense-making practices.
- DCEY2025 aims to reach out a wide range of stakeholders and target groups including but not limited to policy-makers, professionals in education, parents and carers and the general public in the Council of Europe member states. The main beneficiaries are learners of all ages.
- 2030 "[Learners First](#)" strategy was endorsed: the main actions will focus on promoting flexibility in curriculum and programme design, learner autonomy, professional development of education professionals, and democratic and participatory governance of education systems and institutions. The first implementation phase of the strategy will run from 2024



to 2026 and the second from 2027 to 2030 focusing on the development of three dimensions in every learner: the "civic" learner, the "intercultural global" learner, the "digital" learner. Particular attention will be paid to the overall well-being of the learner. The Strategy will extend and strengthen the Council of Europe's previous efforts in education cooperation in Europe and contribute to regional and global efforts, such as the [United Nations' Sustainable Development Goal 4 \(SDG4\)](#)

In France:

At the end of 2023, the French Parliament concluded its work of an Information mission on education and digital technology by highlighting that:

- *“Measures to protect children from digital technology by trying to keep them away from it were insufficient in themselves, and that it was necessary, in addition, to encourage children's autonomy by educating them about digital technology”.*
- Due to the omnipresence of screens and their effects on health which are a cause for concern, even at the highest level of the French government, a Committee of experts was appointed to assess the impact of young people's exposure to screens which interviewed around a hundred of experts and practitioners, among which the CNIL and met a panel of 150 young people. [The report published on 30 April 2024](#) (in French) provides 29 recommendations to be translated into action.

In January 2024, Marie-Laure Denis was reappointed Chair of the CNIL for a five-year term. The topic of child protection in online use and digital education was set among [her priorities for the next five years](#).

Forward looking plan 2024-2025 for the Digital Education Working Group

The 2024-2025 draft action plan will provide priority topics and activities to be submitted for adoption at the 46th GPA Conference.

- Looking ahead, the DEWG is leading a programme of work presented last year that will continue to strengthen the group's ability to facilitate cooperation on exchange of best practice and development of **joint actions on digital literacy and on the use of emerging technologies (including EdTech and Artificial Intelligence)** in education as well as promoting children's rights and their empowerment in the digital ecosystem.
- At the same time, members would be expected **to promote the joint DEWG booklet**. They would undertake awareness-raising activities and dissemination of the multi-language



resource pooling innovative events and materials in respective countries and networks towards the education community.

- Moving forward, the DEWG will build on **members consultation findings with regards to parents' relationship to the digital culture** to substantively progress on delivering key clear, coherent and realistic messages to families and participate in a dynamic promotional campaign in the end of 2024.
- **Further collaborate on Age Assurance issues** with regards to the evolution of technical solutions and international standards in full respect of the rights to privacy and data protection of children as users.
- Encourage members to contribute to the co-creation and collaborative efforts **of a common curriculum framework for digital citizenship education under construction** by international organisations:
 - Being associated to the development of a new Framework of digital citizenship skills potentially including the use of AI, could guide and support teachers in teaching and in facilitating learning, and to also support students in the acquisition of digital citizenship education with AI as part of competencies.
 - The design of such a curriculum framework that can be used by all would address with enough flexibility the differences between the education systems and go beyond the traditional narrow format relating to content and structure of school curricula, range of topics covered and amount of coverage, freedom of schools and teachers to innovate.
- **Promote awareness campaigns on privacy and data protection:** The 2025 European Year of Digital Citizenship Education stands as a pivotal opportunity for DEWG members to enhance the visibility and impact of Digital Citizenship Education encompassing Rights and Responsibilities, Privacy and Security among its 10 key domains.
 - Contribute to the creation of targeted campaigns on local, national and international scale, with support and guidance from the Council of Europe and other major international institutions.
 - Due to its large scope of potential activities, it would encompass raising awareness on digital literacy education in an inclusive and democratic society, deepening public understanding of digital literacy education and its importance, in particular among professionals in education, policy makers and parents.
 - Advancing the **topic of inclusion in digital education** with special focus on best practices with children and their participation in the digital space could benefit from this workstream.



The work plan for the upcoming year will result from a large consultation and input process with members of the DEWG which will take place in early October 2024. The roadmap will then further be adopted.

Conclusion

In the fourth year of its implementation, the DEWG has again renewed its commitment to protect children in the digital environment, and promote their privacy rights in line with the key objectives set in the international 2021 Resolution on Children's digital rights.

The DEWG has progressed to demonstrate the importance of gradually empowering children by producing and disseminating a wide range of promotional and awareness-raising activities by age groups. The joint Booklet is a good illustration by global GPA community of putting together innovative public actions and resources addressing the various target groups. We would like to sincerely thank the GPA design team who has also provided time, and efforts of creativity to finalize this Booklet as an achievement at disposal of all educational structures.

The DEWG has delivered a sustainable monitoring activity on topics such as data governance of EdTech as well as AI in relation to children's rights. It has proved to be high on the agenda of many international organisations. Consequently, the Group will continue to work and engage in close cooperation with these actors towards building a more comprehensive view about what is being done to guide digital tools and AI technology in educational settings and how the right to data protection is being approached when using such emerging technologies in the classroom.

The common work on other matters related to supporting both families and teachers who do not fully understand how to address children's rights on the internet and social media to prevent cases of cyberbullying and online harm, due to lacking of digital literacy skills, demonstrates that global strategies on such current and pressing issues need to be further addressed by the DEWG task forces set up.

Some new opportunities for international collaboration will certainly be explored in the Education areas to take advantage of the declared **2025 European Year of Digital Citizenship Education** to work together towards common goals.

Appendix 1

CIRCABC – Folder tree - Revised in June 2024

A. LEGAL INSTRUMENTS AND RESOLUTIONS ON PRIVACY EDUCATION AND DIGITAL RIGHTS

- a. International legal instruments on privacy education and digital rights
- b. National legal instruments on privacy education and digital rights
- c. Resolutions / Declarations on privacy education and digital rights

B. SURVEYS– PUBLICATIONS ON DIGITAL EDUCATION, TRAINING, AI IN EDUCATION

- a. General studies– Reports on digital education, training, AI in education
- b. Specific studies– Publications by DPAs, and the DEWG related to digital education, training, AI in education

C. AWARENESS-RAISING ON THE EXERCISE OF DIGITAL RIGHTS

- a. Educational resources on children’s rights
- b. Procedure for requesting access, information intended for children
- c. Complaints mechanisms for minors
- d. Consultations – surveys / study reports

D. EDUCATIONAL RESSOURCES FOR STUDENTS

- a. Resources / videos clips/ movies/ games/ comics/ practical tutorials
- b. Posters/ flyers

E. STOCKTAKING ON NATIONAL COMPETITIONS

- a. Inventory of DPAs competitions
- b. Guide for Data Protection Competitions

F. EDUCATIONAL RESSOURCES FOR PARENTS

- a. Guides
- b. Information Notices / exercising of rights
- c. Parental control systems
- d. Awareness raising campaigns on digital parenting

G. TEACHING RESOURCES

- a. Competency Frameworks
- b. Lesson plans and Discussion Guides
- c. Manuals / teaching handbooks
- d. Mixed ready-to-use educational kits (teachers/ students)

H. TRAINERS MATERIAL

- a. Questionnaire to evaluate the level of trainers
- b. Trainers’ packs



I. E-LEARNING PLATFORMS AND REMOTE LEARNING

- a. Pedagogical eLearning platforms
- b. Study reports/ Surveys
- c. Guidelines / Codes of Practice
- d. Tutorials, posters, flyers

J. CYBERSECURITY

- a. Awareness-raising resources and activities for young people, students and parents

K. DATA PROTECTION AWARENESS CAMPAIGNS FOR YOUNG ATHLETICS

- a. Resources, guides

L. CONTRIBUTIONS TO AGE VERIFICATION

- a. Reports from international working groups
 - a.1. IAAWG
 - a.2. EU
 - a.3. ISO
 - a.4. Other international actors
- b. Research, surveys, consultations related to age verification
 - b.1. At national level
 - b.2. At international level
- c. Statements on age verification (national / European / international levels)