

1. What are the most important **achievements** arising from WSIS that should be highlighted in the Zero Draft? \*

The WSIS process has made significant contributions to developing a shared global vision for an inclusive and development-oriented Information Society. Yet from a child rights perspective, progress remains partial. WSIS's early recognition of young people as active digital participants was promising, but the rights of the child, as set out in the UN Convention on the Rights of the Child (UNCRC), were not integrated into its original agenda. Since then, children's rights have been affirmed to apply equally in the digital environment through the UN Committee on the Rights of the Child's 2021 General comment No. 25.

In preparation for WSIS+20, we convened a global expert consultation to inform the UN Commission with on Science and Technology for Development's report to the General Assembly's twenty-year review. The consultation brought together 14 high level child rights experts from UN bodies (such as the ITU, UNICEF, UNESCO, UN Special rapporteurs and the Committee on the Rights of the Child), international NGO's (such as Save the Children, Child Rights Connect Asia, Eurochild, Alana, Mtoto News and 5Rights Foundation), and leading academics.

A key criticism was that WSIS has failed to meaningfully integrate children's rights into its digital governance framework. While it created space for dialogue, children have not fully been recognised as rights-holders. Experts pointed to their persistent exclusion from governance processes, the overreliance on voluntary compliance by tech companies, and the lack of enforceable standards that would protect children from systemic exploitation, such as behavioural profiling and data monetisation. This reflects a broader concern that WSIS outcomes and digital governance structures have not sufficiently responded to the unique experiences and vulnerabilities of children in the digital environment. Falling short of the obligations and standards set out in the UNCRC and General comment No. 25.

Across the consultation, experts emphasised that current digital governance frameworks are failing to safeguard children's rights, particularly their right to safety and protection from harm. Our research indicates that the nature and scale of the harms children experience online are worsening (van Der Spuy et al., 2024). All the while, regulatory tools remain fragmented, reactive, and nationally siloed, making them ill-suited to address the cross-border nature of digital technologies. Experts have repeatedly highlighted the need for a unified global approach to tech regulation, suggesting that while local legislative efforts, such as the UK's Age Appropriate Design Code, have shown promise, they must be scaled globally and adapted locally, and enforced through binding standards, rather than relying on voluntary codes.

In sum, the WSIS+20 expert consultation called for a coherent, enforceable digital governance framework grounded in child rights, global cooperation, and meaningful participation. The inclusion of child-specific language in the Global Digital Compact, and its alignment with the 2024 Pact for the Future, mark vital progress. Recognising children as rights-holders and stakeholders in this way must guide the forthcoming rafting of the Zero Draft of the Elements Paper.

References:

van der Spuy, A., Witting, S., Burton, P., Day, E., Livingstone, S. & Sylwander, K.R. (2024). Guiding principles for addressing technology-facilitated child sexual exploitation and abuse. Digital Futures for Children centre, LSE and 5Rights Foundation.[https://eprints.lse.ac.uk/126219/1/van\\_der\\_Spuy\\_et\\_al\\_2024\\_Guiding\\_principles\\_for\\_addressing\\_technology-facilitated\\_CSEA.pdf](https://eprints.lse.ac.uk/126219/1/van_der_Spuy_et_al_2024_Guiding_principles_for_addressing_technology-facilitated_CSEA.pdf)

United Nations Committee on the Rights of the Child. (2021). General comment No. 25 (2021) on children's rights in relation to the digital environment (CRC/C/GC/25). <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation>

2. What are the most important **challenges** to the achievement of WSIS outcomes to date and in the future that need to be addressed in the Zero Draft? \*

Children make up one-third of global internet users (Livingstone et al., 2015) but remain largely excluded from digital policy and governance. A key challenge to achieving WSIS outcomes is the failure to recognise children as a distinct stakeholder group with specific rights and needs. Though paragraph 46 of the WSIS+20 Elements Paper mentions children's rights, this must be mainstreamed throughout the framework, in line with the Global Digital Compact.

Children's rights are routinely violated in digital spaces, largely because digital products were not designed with children in mind. Commercial models prioritising profit over protection enable practices like profiling, targeting, and datafication, often without informed consent, undermining rights to privacy, participation, protection, and play, as highlighted in UNCRC General Comment No. 25.

In our WSIS+20 child rights expert consultation (see Q1), key challenges identified included the lack of enforceable frameworks, overreliance on voluntary corporate compliance, weak accountability, and missing child-specific safeguards. These gaps have enabled ongoing online harms, data exploitation, and the exclusion of children from decision-making. For instance, the ECPAT and UNICEF led Disrupting Harm study (2022) indicates that in some countries up to 20% of children were victims of online sexual exploitation and abuse, while a Lancet review (Fry et al., 2025) estimates that 8% of children worldwide have experienced online child sexual exploitation.

WSIS outcomes will remain unfulfilled unless child rights obligations are translated into binding obligations for states and corporations. As one expert highlighted: "The governance gap isn't just about gaps in law, it's a gap in accountability, especially for global tech firms operating across borders." The lack of regulatory coherence across borders, the limited application of child rights impact assessments, and weak enforcement mechanisms hinder effective protection of children in digital environments. Despite the UNCRC and General comment No. 25 providing a robust legal foundation, these instruments have not been consistently implemented in digital governance. Additionally, WSIS outcomes have not sufficiently integrated principles such as the best interests of the child, privacy by design, or child participation.

The Global Digital Compact and WSIS's response to its call represents a unique opportunity to centre children's rights in global digital governance. But this requires stronger and more explicit commitments, particularly on by-design principles, independent oversight, binding governance, meaningful child participation, and the dismantling of exploitative business models. The WSIS+20 Elements Paper Zero Draft must reflect this urgency and address children's online protection, safety, digital inequalities, including access, skills and autonomy.

References:

ECPAT International (2022). Disrupting Harm – Conversations with Young Survivors about Online Child Sexual Exploitation and Abuse. Global Partnership to End Violence against Children. <https://safeonline.global/wp-content/uploads/2023/12/Disrupting-Harm-Conversations-with-young-survivors-about-online-child-sexual-exploitation-and-abuse.pdf>

Fry, D., Drzeczowska, A., Ren, J., Lu, M., Fang, X., Anderson, N., et al. (2025). Prevalence estimates and nature of online child sexual exploitation and abuse: a systematic review and meta-analysis. *The Lancet Child & Adolescent Health*, 9(3), 184-193. [https://www.thelancet.com/journals/lanchi/article/PIIS2352-4642\(24\)00329-8/abstract](https://www.thelancet.com/journals/lanchi/article/PIIS2352-4642(24)00329-8/abstract)

Livingstone, S., Carr, J., & Byrne, J. (2015). One in three: Internet governance and children's rights. Global Commission on Internet Governance. [https://www.cigionline.org/sites/default/files/no22\\_2.pdf](https://www.cigionline.org/sites/default/files/no22_2.pdf)

3. What are the most important **priorities** for action to achieve the WSIS vision of a 'people-centred, inclusive and development-oriented Information Society' in the future, taking into account emerging trends? \*

Achieving a truly inclusive and people-centred Information Society demands that children's rights be fully embedded in the WSIS framework. As the UNCRC General comment No. 25 asserts, the digital world is no longer optional for children, it is a central context for education, health, social participation, and identity formation. Therefore, policies that ignore or inadequately address children's needs cannot claim to be inclusive or development-oriented.

The WSIS+20 Zero Draft must explicitly and consistently recognise children as rights-holders, and recognize their particular needs and vulnerabilities. Priority actions should include requiring digital service providers to embed Child Rights by Design principles, including privacy-by-default, safety-by-default, and ethical AI. These must be enforced through binding regulation, regular auditing, and remedies for rights violations.

Inclusion also demands equitable digital access, especially for children in the Global South, where digital divides in infrastructure, affordability, and digital literacy remain stark. WSIS must prioritise public investment in rights-based digital education, support local content and languages, and ensure safe and age-appropriate services that foster digital citizenship and creativity.

Despite the ubiquitousness with which children experience their rights violated in digital environments, and the failures to protect and safeguard their rights, digital governance must not reduce children's engagement to protection alone. A future-oriented Information Society must support children's rights to participate in shaping the digital environment, as affirmed in both the UNCRC's General comment No. 25 and the Global Digital Compact. This includes consulting children in product design, policy development, and data governance decisions that affect them.

To achieve the WSIS vision, the Zero Draft must promote a holistic and child rights-centred digital future, one that ensures children's wellbeing, autonomy, and dignity, now and in the decades to come.

Children must be explicitly recognised as rights-holders while also recognising their particular vulnerabilities and needs. Future action must include:

- Embedding General comment No. 25 into digital governance frameworks.
- Institutionalising child rights impact assessments.
- Adopting child-rights-by-design and privacy-by-default principles to ensure children's safety online, while also ensuring they can access the benefits and opportunities the digital environment offers towards the fulfilment of their rights (like freedom of expression, participation, play, access information and more).
- Ensuring meaningful participation of children in digital policymaking.
- Creating strong oversight mechanisms with enforceable standards.

One participant at our international expert consultation for WSIS+20 put it succinctly: "We need to move from a harm-based approach to a rights-based one. Children's rights are not about just safety, they're about dignity, agency, expression."

4. What **additional themes/issues**, if any, should be included in the Elements Paper? \*

The Elements Paper must explicitly recognise children as a distinct rights-holder group across all digital governance discussions. Currently, while paragraph 8 notes “marginalised groups,” children are not named alongside women, persons with disabilities, or Indigenous Peoples, despite their distinct legal status under the UN Convention on the Rights of the Child (UNCRC) and the explicit recognition of the importance of children’s rights in the Global Digital Compact. Paragraph 46 refers briefly to children’s rights, but this should be strengthened by embedding child-specific priorities across the Paper.

Additional themes should include:

- Child-specific data governance, emphasising safety and privacy, child rights by-design and by-default, in line with General comment No. 25.
- Commercial exploitation of children’s data, including profiling, behavioural advertising, and surveillance, which increasingly shape children’s digital lives.
- The right to meaningful participation, recognising children not only as vulnerable but also as capable digital citizens whose perspectives must shape the systems they inhabit.
- Digital resilience and well-being, to support children’s full range of rights (including the right to expression, play, association, and identity) in digital environments.
- Accountability mechanisms, including independent oversight of industry practices, robust enforcement of privacy protections, and effective remedies when children’s rights are violated.

The Zero Draft must respond to the reality that children make up a third of internet users, in many places more than that, yet are seldom specifically or adequately recognised in data governance. Integrating a comprehensive, child rights-based vision for children in the digital world will align WSIS with the commitments of the Global Digital Compact and the Sustainable Development Goals, as well as the UN Convention on the Rights of the Child and its General comment No. 25 on the rights of children in relation to the digital environment.

5. Do you wish to comment on **particular themes/issues/paragraphs** in the Elements Paper? \*

While the Paper contains several welcome recognitions of equity and human rights, it lacks the specificity and structural commitment necessary to protect and realise the rights of children in digital governance.

Paragraph 8 should explicitly name children as a marginalised group requiring focused attention. This would bring the Paper in line with other intergovernmental frameworks, including the Global Digital Compact Zero Draft and the UN Committee on the Rights of the Child’s General comment No. 25, recognising that children’s rights apply equally in the digital environment.

Paragraph 29, on digital governance, should reflect that children require targeted protections, not only from harm, but from structural exclusion in decision-making. Currently, multistakeholder processes often overlook children’s voices entirely.

Paragraph 46, which briefly references children’s rights, must go further to recognise the UNCRC and General comment No. 25 as a foundational framework for digital governance.

Other sections dealing with data, AI, online safety, and access should integrate the principle of the best interests of the child as a primary consideration, and require child rights impact assessments for technologies likely to be accessed by children.

6. What suggestions do you have to support the development of the **WSIS framework** (WSIS Action Lines, IGF, WSIS Forum, UNGIS etc.)? \*

To align with international human rights law and reflect contemporary digital realities, the WSIS framework should include:

A dedicated child rights mechanism across WSIS governance bodies; such as a Children’s Rights stream within the IGF or a cross-agency Working Group within WSIS Forums, tasked with mainstreaming children’s rights and participation in the digital environment.

Child rights impact assessments (CRIA) should be embedded in the work of digital governance entities, ensuring that children’s needs are assessed early and systematically in policy and design processes.

Institutionalised participation for children in line with Article 12 of the UNCRC on the right of the child to be heard. This means not just protecting children, but actively including them in decisions that affect their lives, including online, supported by accessible formats and safe consultation methods.

These changes will help ensure that digital governance frameworks are not only inclusive in rhetoric but also in practice, delivering on the WSIS vision of a truly people-centred information society, which includes children and their specific rights and needs.

7. Do you have any **other** comments? \*

WSIS+20 presents a critical opportunity to rectify historical oversights. Digital environments are now primary sites of childhood. Children use, inhabit and are shaped by these environments in ways that require specific protections and active inclusion.

A child rights-based approach must become central to WSIS+20's vision of inclusive digital development. Despite decades of recognition under international law, children's rights continue to be inadequately reflected in global digital policy. This failure has tangible consequences: exploitative data practices, exclusion from decision-making, and environments that prioritise profit over protection.

The WSIS+20 process has a significant opportunity to close this gap. It should incorporate:

- Legally binding obligations for private sector actors to respect children's rights
- Regular reviews and monitoring of state and industry compliance with digital child rights standards
- Integration with broader UN frameworks, including the Global Digital Compact, the UN Convention on the Rights of the Child and General comment No. 25 on children's rights in relation to the digital environment.

International experts in our global consultation in preparation of WSIS+20 stressed: "We've got the frameworks. What's missing is the political will and enforcement." The Zero Draft must clearly articulate enforceable obligations for states and private actors and align WSIS+20 outcomes with the Global Digital Compact, the UNCRC, and General comment No. 25.

Finally, WSIS+20 should explicitly address the rights of children as current users of digital technologies, not just future beneficiaries. Embedding a strong, actionable child rights framework into WSIS+20 will ensure a future digital society that truly values and protects all its members, including its youngest.

8. Who is **submitting** this input? \*

Kindly provide the name of the person submitting this input, as well as the associated country, organization, stakeholder type, and relevant contact information

Dr Kim R. Sylwander on behalf of the Digital Futures for Children centre at the London School of Economics and Political Science

9. Please provide your **e-mail** address: \*

Please enter an email