

Respecting the Digital Rights of the Child

The United Nations (UN) Convention on the Rights of the Child (UNCRC) recognises children as independent holders of rights and contains 54 articles that cover their protection from abuse and exploitation, the provision of support to reach their full potential and to enable their full participation within society.

An estimated one in three internet users globally is a child. This number is likely to be even higher in the global South (according to UNICEF in 2021) and for a number of years there has been a wide-ranging public debate regarding how best to reflect the 54 articles of the UNCRC when considering children and young people's use of digital networks and services.

In March 2021, the United Nations Human Rights Council (UNHRC) issued General Comment No. 25 on children's rights in relation to the digital environment, which explains how States should implement the UNCRC in the light of the opportunities, risks and challenges in promoting, respecting, protecting and fulfilling all children's rights in the digital environment. The discussion of children's rights in an online context therefore now focuses predominantly on how best to apply the 'provision and participation' aspects of the UNCRC as opposed to focusing exclusively on the protection aspects of the Convention.

In simple terms, there is a recognition that the need to reduce the risk of harm arising from online access must be balanced against the positive and empowering effects of global communication networks and information sources for young people eager to learn more about the world around them.

For example, according to a 2019 [UNICEF report](#), 10-30% of internet using children engage in creative online activities on a weekly basis. The report also highlighted the importance of connectivity for children to access online learning tools and advance their education and digital skills. The COVID-19 pandemic emphasised the importance of this digital connectivity for children. However, even before the pandemic, an estimated 258 million children around the world were not in school. More than half of children globally were not meeting the minimum expected standards in reading and maths (UNESCO, 2018). These problems were made worse by the coronavirus crisis, affecting nearly [1.6 billion learners in more than 190 countries](#). School closures around the world impacted 94% of students. Technology has and will play a vital role in overcoming these barriers, enabling teachers and students – wherever they're located – to access the tools, resources and support they need for a quality education.

However, one of the more contentious issues arises on freedom of expression, which can be impacted by measures designed to prevent children and young people from accessing content that is only suitable for adults (or indeed content that is illegal for any internet user, adults included). The right to anonymity online can play a fundamental role in providing individual citizens with the confidence to express their opinions freely, particularly for citizens living in countries with autocratic regimes where it may not be safe to dissent or communicate their concerns to the outside world. But the same ability to remain anonymous online may also facilitate others to perpetrate harm without accountability.

The discussion concerning the ‘provision and participation’ articles of the UNCRC focuses on ensuring there is greater transparency in the practices of individuals and organisations in areas such as:

- how children’s data is collected and used;
- how access to that data is managed and controlled;
- the digital literacy and resilience skills needed to maintain children’s wellbeing online for both children themselves and caregivers;
- how children can be involved in the evolution of digital networks and services and provided with a voice to help shape their legal rights; and
- raising awareness among children and young people of their rights, including through peer-to-peer methods.

Vodafone and child safety online

Vodafone has been addressing child protection issues on the internet since 2004. We have an internal policy on safeguarding children’s rights online, which sets out our expectations for all our operating companies to follow. These include:

Parental controls

We offer all customers the option to apply parental controls to Vodafone networks and services. The child and parental consent for the controls to be put in place must be in consideration of children’s consent and rights to privacy, participation, access to information and freedom of expression.

Additionally, Vodafone provides customers with information and age-ratings for all content that is under Vodafone’s editorial control – and, if appropriate, we will offer the option for access to be restricted where age appropriate.

Educational material

We believe in empowering digital literacy for adults and young people. We first created a website dedicated to safety information for parents in 2009 followed by the launch of the highly regarded Vodafone Digital Parenting magazine in 2010 which has been distributed for over ten years. These initiatives were piloted within our local UK business but have since been localised in various forms across many of the countries in which we operate.

In 2015, we began to focus on the ‘provision and participation’ aspects of children’s digital rights. In partnership with The Diana Award, we piloted the ‘Peer 2 Peer Digital Resilience’ initiative ‘#BeStrong Online’, which consisted of ten education modules designed for 11 to 13-year-olds (to be delivered by older students) that introduced young teenagers to some of the issues they may encounter in a digital world and equipped them with the knowledge and techniques to cope with those challenges.

We were also an industry partner in the EU ENABLE project that aims to deliver a holistic approach to social and emotional learning, targeted specifically at the issue of bullying. The ENABLE pilot was implemented in five countries across Europe in 2016, and reached around 6,000 young people aged 11 to 14 years, approximately 2,000 parents and at least 30 schools.

Over the years we have created further resources to help families lead happy and safe digital lives which are hosted on our Digital Parenting page on our news centre. This includes our 2023 launch of Digital Parenting Pro – a free online resource to educate adults on the parental controls available

across the most popular apps, games and devices. This was created in collaboration with Digital Awareness UK with helpful tips from the NSPCC.

We have run a number of child online safety initiatives around the world to empower parents, carers and schools and to help young people make the right digital choices. More details are available here: [Home | ICT Coalition](#).

Preventing access to child abuse content

Within the UNCRC, there are three optional protocols, one of which deals with the issue of sexual exploitation and child sexual abuse material.

Vodafone is a founding member of the Internet Watch Foundation (IWF) and a founding signatory of the GSMA Mobile Alliance Against Child Sexual Abuse Content which commits to the removal of such content or, where this is not possible, the disruption of the sharing of or access to this material. In the IWF's view, each time an image is viewed, this is tantamount to another action of abuse being perpetrated. According to the [IWF](#), the number of webpages found to contain the most extreme material has doubled in recent years.

The IWF therefore creates a block list which consists of URLs that the IWF have identified as constituting online child sexual abuse material. Their view is that the take down or blocking of content protects the victim from additional suffering.

Some critics view the IWF block list as a form of censorship. While the IWF operates under a memorandum of understanding with public prosecutors and senior police officers in the UK (where the IWF is based), an understanding of that kind is not equivalent to a court order or specific requirement under the law. There is therefore concern among some freedom of expression and privacy activists that the IWF block list sets a precedent for telecommunications operators to choose to block access to certain types of content without a lawful instruction to do so, either of their own volition (on a self-regulatory basis) or in response to political pressure.

However, we would highlight that the criteria applied by the IWF when assessing whether or not material is considered to be child sexual abuse material are aligned with the legal definitions used by law enforcement agencies in the countries in which we operate. It is also notable that the IWF's expertise in identifying this material has been accepted by public prosecutors and senior police officers in the UK.

As part of our commitment to upholding the rights of the child at all stages of our business operations¹, we require all our operating markets to apply the IWF block list on our networks worldwide, unless this would be unlawful, such as under privacy regulations or laws relating to confidentiality of communications. In those situations, we require our operating markets to engage with local regulators to clarify and confirm the position, as well as advocating for a legal basis to block access to the material.

Promoting access to safe digital environments

¹Vodafone Human Right Policy Statement:
<https://www.vodafone.com/content/dam/vodcom/sustainability/pdfs/vodafone-group-human-rights-policy-statement-december-2019.pdf>

By providing access to content and services, Vodafone plays an important role in supporting children’s right to access to information, freedom of expression and offers them new venues and channels to make their views heard.

Our commitment to the Children's Rights and Business Principles

Vodafone’s aims for its approach to digital child rights to be in alignment with the Children’s Rights and Business Principles (CRBP), a comprehensive set of principles to guide companies on actions they can take to respect and support children’s rights. It was developed by UNICEF, the UN Global Compact and Save the Children.

CRBP Principle	Vodafone’s position	Supporting statements and policies
Meet their responsibility to respect children’s rights and commit to supporting the human rights of children	Children’s rights considerations are integrated into Vodafone’s business principles, codes of conduct and other policies.	Our Human Right Policy Statement states: “We recognise that children can be a particularly vulnerable group in today’s digital world. We are committed to upholding the rights of the child at all stages of our business operations and seek to support children and their parents to become responsible digital citizens. We will continue to provide knowledge, tools, controls and resources to help our customers keep pace with the rapid advances in technology, devices, apps and the ways this technology is used”
Contribute to the elimination of child labour, including in all business activities and business relationships	Vodafone is committed to eliminate child labour in all its operations and prohibits this in its supply chain.	<p>Our Code of Conduct states “We base relationships with and between employees on respect for individuals and their human rights. We do not tolerate child labour”.</p> <p>Our Human Right Policy Statement states: “We do not tolerate forced, bonded or compulsory labour, human trafficking, child labour and other kinds of slavery and servitude within our own operations or within our supply chain, and are committed to taking appropriate steps to ensure that everyone who works for Vodafone – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.”</p> <p>Our Supplier Code of Ethical Purchasing states: “Supplier shall strictly prohibit child labour. No person shall be employed who is below the minimum legal age for employment. The minimum age for employment shall be the age for completing compulsory education in the relevant country or not less than 15 years of age (or not less than 14 years, in countries where educational facilities are insufficiently developed, in accordance with international principles), whichever is higher. Children (persons under the age of 18) shall not be employed for any hazardous or night work, or work that is inconsistent with the child’s personal development. In the</p>

		<p>event Supplier discovers a child is employed, the best interests of the child shall be the primary consideration. Supplier shall contribute, support and/or develop policies and programmes that assist any child found to be performing child labour.”</p>
<p>Provide decent work for young workers, parents and caregivers</p>	<p>Vodafone provides a healthy and safe working environment for all employees, contractors, partners or others who may be affected by company activities.</p>	<p>Our Code of Conduct states “The health, safety and wellbeing of our employees is one of our most fundamental responsibilities. Everyone working for or on behalf of Vodafone must behave in a safe and responsible manner at all times. Our commitment to safety does not differentiate between our own employees and contractors and our suppliers’ employees and contractors. We expect our suppliers to be accountable for managing health and safety risks in their operations and meet our high standards as set out in the Code of Ethical Purchasing. We want everyone working for or with Vodafone to return home safe every day.”</p> <p>Our parental leave policy states that any Vodafone employee who is or whose partner is having a baby, adopts a child or becomes a parent through surrogacy to take 16 weeks paid leave at any time during the first 18 months.</p>
<p>Ensure the protection and safety of children in all business activities and facilities</p>	<p>Vodafone is committed to the welfare and safeguarding of children and young adults within all the activities we undertake.</p>	<p>Respect for children’s rights is included in many of our internal policies. For example, our Employee Acceptable Usage Policy states that employees, contractors, consultants and suppliers must not use company resources to access, disseminate or store child sexual abuse images or material.</p>
<p>Ensure that products and services are safe, and seek to support children’s rights through them</p>	<p>Vodafone is committed to protecting children’s rights in its products and services.</p>	<p>Our Human Right Policy Statement states: “We seek to minimise the risk of any inadvertent or adverse human rights impact associated with the development of our products and services, including new technologies such as Artificial Intelligence and Internet of Things.”</p> <p>We include children’s rights considerations in processes for evaluating new products and services.</p>
<p>Use marketing and advertising that respects and</p>	<p>Vodafone ensures that communications and marketing do not have an</p>	<p>Our Group External Communication Policy and Brand Guidelines set out guidance on responsibly engaging with social media influencers and sponsorship.</p>

supports children's rights	adverse impact on children's rights	
Respect and support children's rights in relation to the environment and to land acquisition and use	Vodafone commits to supporting child rights in communities affected by its operations.	<p>Our Human Right Policy Statement states: "Communications networks are infrastructure intensive and where relevant, we remain committed to transparent consultation and active engagement with landowners, community leaders and municipal authorities. This engagement is undertaken in compliance with our anti-bribery policy that makes it clear that we never offer any form of inducement to secure a permit, lease or access to a site."</p> <p>Our Human Right Policy Statement states: "We recognise the important role of civil society advocacy. We value constructive dialogue with civil society, including with human rights defenders, to advance the respect for human rights and will seek to engage where relevant and appropriate for both parties"</p>
Respect and support children's rights in security arrangements	Vodafone commits to developing additional child rights measures in the security arrangements we procure.	Vodafone is reviewing the due diligence and requirements it makes of suppliers of security services to our business.
Help protect children affected by emergencies	Vodafone commits to supporting child rights in communities affected by its operations.	The Vodafone Foundation is involved in disaster and crisis response in a number of ways: instant network emergency response; instant schools for refugees; and support in humanitarian crises.
Reinforce community and government efforts to protect and fulfil children's rights	Vodafone commits to collaborating with communities and governments to protect and fulfil children's rights.	<p>Our Human Right Policy Statement states: "We recognise the important role of civil society advocacy. We value constructive dialogue with civil society, including with human rights defenders, to advance the respect for human rights and will seek to engage where relevant and appropriate for both parties".</p> <p>Our website details how we collaborate with others on children's rights.</p>