**UAE’s Ministry of Interior – Child Protection Centre’s**

**comments on children’s rights in relation to the digital environment**

Kindly find below comments on behalf of the United Arab Emirates, Ministry of Interior Child Protection Centre. As requested, comments are provided while indicating precisely the paragraphs to which comments are being made. It is also advisable to prepare a guidelines document as this will bring up many questions on how to implement the *general comment.*

Para 7- Encourage governments to publish a *Know Your Digital Rights* booklet where the laws are summarized in age friendly language and also the police response to different scenarios

Para 12- Regarding particular measures for named vulnerable groups, specialized informative content should be created. Further guidance should be drafted.

Para 16- In order to protect children from risks and threats, they must be informed. This requires prepared informative content based on the subject of the digital risk and on the platform type. Information should be age-group specific, and subject specific and be made available in different content forms e.g. videos, games, booklets.

Para 24 Model legislation- provide examples such as Lanzarote Convention and ICMEC Child Sexual Abuse Material: Model Legislation and Global Review

Para 44-50-Elaborate with examples of coordination (MLAT), reporting mechanisms, shared multi-agency framework, provide examples.

Para 60- Provide guidance on how to safely express themselves, do’s and don’ts keeping in mind digital footprints.

Para 82- Crucial point on keeping up with the digital harms children face. In the guidelines document, examples can be shared on guidelines on what countries have set up regarding digital safety. E.g. Australian e-Safety Commissioner, UAE’s National Child Digital Safety Initiative

Para 87- Provide details/examples/best practices on how business enterprises meet their responsibility to effectively protect children from all forms of violence (e.g. propose alternatives to MLAT’s in USA)

Para 123- Provide model legislation/articles exemplifying how to legislate to ensure that children are protected from crimes

Para 127- Due to the growing need for international cooperation through transnational crime via the Internet, treaties such as MLAT’s are increasingly becoming more of a barrier than an aid. In support of paragraphs 87 and 123, companies should be given incentives to make it part of the CSR initiatives to help law enforcement, and make exceptions in cases of online child sexual abuse and exploitation and penalize companies who are not cooperative with law enforcement with regards to online child sexual and exploitation.