



The International Play  
Association (England)  
c/o 255 Saffron Lane  
Leicester  
LE@ 6UD  
UK

## **Comments from The International Play Association (England branch) on the Concept Note for a General Comment on children's rights in relation to the digital environment**

We welcome the Committee's movement on this important issue, and would like to contribute the following points.

1. Children increasingly spend time in digital environments, devoting more and more time to playing in them. Although access from a fixed location is often considered to be the focus for children's online play, their widespread use of mobile technology has radically changed this. In the minority Global North and increasingly in the majority Global South, children are using mobile devices to get online and consequently incorporate in their play, and it is here predominately that attention needs to be paid.
2. General Comment 17[1] (paragraphs 45 & 46) on Article 31 of the UNCRC outlines the growing role of electronic media, highlighting both positive and negative aspects of this engagement. The General Comment in its entirety has received significant promotion through the members of the International Play Association, which has active branches in 20 countries and members in nearly 50. GC17 is therefore ideally situated to become the core of the play section of the new General Comment.
3. Children use mobile devices in their play in inventive ways [2] and incorporate their devices into more traditionally recognisable play behaviours, often playing similarly offline as they do online [3] and blurring the two together. A General Comment needs to acknowledge this and look at how play in digital environments cannot be disaggregated from the rest of children's play lives; looked at in isolation from their rights in other environments; or indeed considered without consideration of the overall context within which individual children live.
4. All access to digital environments occurs in a physical environment, and these can just as easily be in a natural environment as in an urban one. Children's play in digital environments has intrinsic value and should not be considered as 'second best' to outdoors play. It has been suggested that children can 'extend their worlds through technologies' [4]. This should not however be used to restrict access to play in the outdoors or to take away existing, planned, or future spaces for children's outdoor play.



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5. Access to the internet is often considered by children to be a right [5]. Access should not be denied to children because of their age, but they should be able to access digital environments in safety. Risk taking is an important part of play [6, 7] and 'not all [online] risk results in harm' [8]. States should provide clear, comprehensive and effective methods to ensure children can only access appropriate environments. This includes monitoring and regulation of businesses who make provision for digital environments, who should have clearly defined responsibilities towards children's rights, particularly as regards protection.
6. States themselves should have responsibility for ensuring there is provision for children to access digital environments, and that children can participate in any decisions which affect the digital environments they access.
7. Parents and trusted adults have a pivotal role to play. Parental over-use of mobile phones in particular has a detrimental effect on the building of empathy with their children [9] and can restrict children's requests to play and access play provision. This can also lead to children following parental examples and prioritising digital environments over outdoor ones.
8. Gender, poverty, disability and other factors can limit access to digital environments, and States should prioritise equity of access. This also contributes towards Sustainable Development Goal 5, (Gender Equality) and Goal 10, (Reduced Inequalities).
9. Although play has an important intrinsic value, children also learn through play, contributing to Sustainable Development Goal 4 (Quality Education). In an increasingly digital world, playing in a digital environment builds skills and creativity in using technology contributing to children's agency and ability to contribute as active citizens.
10. As digital environments are rapidly changing, ongoing research is needed to monitor and evaluate their impacts on the multiplicity of global childhoods. The Unicef Discussion Paper [10] on the impact of digital technology on children's mental well-being, social relationships and physical activity could usefully provide the basis of this. Evidence-based research and a rights based approach is key to the formulation of policy and guidelines which protect from and provide access to digital environments.
11. In conclusion, we support the creation of a new General Comment and the grouping together of culture, leisure and play within it.

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