## Reponses to concept note for a General Comment on children’s rights in relation to the digital environment

**Introduction**

National Day Nurseries Association (NDNA) is the national charity representing children’s nurseries across the UK.

We are the voice of the 21,000-strong nursery sector, an integral part of the lives of more than a million young children and their families. We provide information, training and advice to support nurseries and the 250,000 people who work in them to deliver world-class early learning and childcare.

Our vision is for a society where all children and families receive the best-quality care and learning that enable them to reach their potential. We are committed to making this a reality through our mission to empower nurseries to provide sustainable, excellent care and early learning for children.

NDNA gives practical support for early years practice and business, whilst informing and influencing policy so providers at the frontline can deliver quality services. Working closely with local and national governments in England, Scotland and Wales, we campaign on high quality and choice of childcare to benefit children, families, nurseries providers and the economy.

NDNA evidence and views on children’s rights in relation to the digital environment

* There is little doubt that the digital environment is shaping the way we behave and think. In early years parents and practitioners have the power to dictate children’s relationship with technology and its influence on how they develop in ways that are both beneficial and detrimental.
* It is important to start from the viewpoint that technology is here to stay and therefore we must see the implementation of digital use in early years as a beneficial way to support, motivate, enhance and extend young children’s learning as well as creating good habits such as self-regulation from an early age. As we move forward we need to challenge our views on uses of technology - what does it mean for children and for us, how can we continue to be part of it, what can be done with it, how can we learn and create with it.

In the world of technology things move forward so quickly that we have little time or experience in understanding how these advancements influence our children. Research shows technology can be both beneficial and harmful to the different ways in which children’s brains develop. There is a school of thought that because children’s brains are still developing and malleable, frequent exposure to technology is actually wiring the brain in ways very different than in previous generations.

For example, research shows that children’s immediate environment determines the kind of attention that they develop. In the past, children spent considerable amounts of their time reading, an activity that requires intense and sustained attention, imagination, and memory. The internet gives children a different environment that causes the brain to pay attention to information very differently than reading – is this good or bad?

Research has shown that learning by reading uninterrupted text resulted in faster completion and better understanding, recall, and learning than those who read text filled with hyperlinks and advertisements. Students who were allowed internet access during class did not recall the lecture nor did they perform as well on a test of the material. Reading developed reflection, critical thinking, problem-solving, and vocabulary better than visual [media](https://www.psychologytoday.com/intl/basics/media).

However, use of technology such as video games and other screen media can help improve visual-spatial capabilities, increase attentional ability, reaction times, and the capacity to identify details among clutter. Using technology is making children think differently. For example, children may be less adept at remembering things and more skilled at remembering where to find things. Knowing where to look is becoming more important for children than actually knowing something. You could argue that not having to retain information in our brain may allow it to engage in more “higher-order” processing such as contemplation, critical thinking, and problem-solving.

NDNA believe that we need more research and time to analyse the implications of technology on children and especially on very young children and whether too much technology results in children having their brains wired in ways that may make them less, not more, able to thrive. Until we know more, advice such as on screen time limits and safe practice must be adhered to. As with everything else children need balance to become rounded, resilient and social beings. Technology has its place but in conjunction with helping children be physically active, communicate face to face with others, imagine, create, play, develop relationships and so on.

Response to Committee questions

**How can children’s views and experiences be expressed and taken into account when formulating policies and practices which affect their access to, and use of, digital technologies?**

Consult with children and involve them in creating rules around digital technology and internet usage that feed into policies. Ensure children have a voice in the setting and their views are respected and actioned. Work cooperatively with children’s families to find out how children use the internet outside of the setting and support families to keep children safe online.

Children’s experiences of ICT in everyday life should be used as a basis for learning. We would suggest the inclusion of something around observing children’s use of technology (real and imaginary) within the setting to help understand how children use technology in their play. This will help to develop practice and policies around digital use; to build on children’s prior experiences and to develop their competencies in using a range of technologies. We believe practitioners in nursery settings are quick to see that children are astute learners in technology – touching screens, books etc. from a very young age but too often see this as harmful rather than exploring with children how technological resources might help children’s creativity, language development, critical thinking, attention to detail and so on. In particular observations can help show how technological resources might help communication with children who have little spoken language or who have special educational needs or disabilities.

Parents may have a better understanding of technology and what constitutes safe usage than some practitioners in nursery settings. However, there is a need to work with parents to develop a better understanding of patterns of digital use at home (their own and their children’s) and developing a shared understanding of how technology may be used in positive ways to enhance language, understanding and creativity, including what technologies might be most appropriate for use in the setting and at home.

It would be beneficial for children’s development to have discussions about the types of adult usage that may encourage negative behaviours and ideas about technology by their children, for example:

* Parents constantly using smart phones in front of their children including mealtimes and leisure time
* Understanding the negative impact on children’s language development
* Children’s rights to their own data – e.g. sharing images though social media
* Understanding their own safe usage (filters, scams)

**How can discrimination (originating offline or online) be effectively addressed, to ensure all children have their rights realised in a digital world?**

In all settings practitioners should monitor use of ICT resources to try and ensure children have equal access and each child has the opportunity to explore and use the equipment and develop their skills in order to develop their potential. In addition, practitioners should review any software to ensure that gender, disabilities and ethnicity are reflected in a balanced way without stereotyping.

Campaigns and resources for early years children to give them strategies and solutions they can implement if they are worried about their data, online abuse or discrimination. Resources and support for early years practitioners to ensure they are knowledgeable and confident about how to support children and what misuse of data, discrimination and abuse can look like and how it can be addressed. Practitioners that can identify both the benefits and disadvantages/dangers of the use of digital technology and the internet for children.

E-safety should be included into all early years qualifications.

**How should the General Comment treat the role of parents and other caregivers?**

Parents play a critical role in their child’s access to the digital technology and the internet. It is essential that parents understand the benefits and risks involved with using digital technology, social media and the internet and the capabilities of games and apps children use. It is no longer enough to suggest they supervise their child’s access to the use of technology over one family computer as young babies and children also now have access to internet connected toys, iPads and smart phones.

Parents need support and advice to ensure they are technology smart, particularly disadvantaged families who may not have regular access to the internet or access to guidance on online safety. High quality settings are supporting parents with online safety, however the percentage of settings doing this is very low.

In the early years sector, staff and managers confidence and knowledge are very low level and therefore often do not allow access to children in the setting to use digital technology. The early years sector as a whole lacks confidence and knowledge in using digital technology. They can on the whole use IT in and outside the setting (for example their personal mobile phones and things like online assessments of children) but they lack pedagogical understanding how technology might support teaching or help develop the characteristics of effective learning. Practitioners need more training on how technologies will enhance and develop learning to meet the needs of the children and help on keeping pace with the continual changes in technology so they can source and use the best resources to support children’s learning. Also training in safe use of technologies and how to communicate these with families and answer family concerns as well as how to recognise and deal with misuse and access to inappropriate content.

Confidence and knowledge needs to be addressed so that support for children and parents is universal across all educational establishments.

**How should the practices of businesses operating in the digital environment support the realisation of children's rights?**

Practices should include;

* having robust procedures that clearly define their responsibilities
* strategies in place to minimise risk
* up-to-date information and training for all employees
* ensure children have confident and knowledgeable adults who can implement policies to support children’s rights
* and understand how to keep children safe online.

This should include helping nursery settings to develop their own policies about use of technology and particularly social media.

Social media – ensure that social media sites follow their own guidelines and make checks on age groups of children, as the implementation of this occurring is very weak and many children under the age of 13 are setting up accounts and accessing material that parents would not want children to be seeing. Clearer guidance to parents and young children on privacy settings so they can make informed choices. Giving teens information and an understanding about how posts can be removed and also about their own digital footprint and the impact on future life choices.

When parents and others (wider family, friends and members of the public) are posting or sharing photos and data about children they need to be fully aware of consequences for children. Determining;

* who owns data
* what and how children can ask to be removed
* when it can be removed
* where the child’s voice is in this
* how are children’s rights represented?
* how can things be removed quickly so as it causes children the least amount of trauma

Toy manufacturers – guidance on use of technology so that children and parents understand the dangers and risks and how to use it safely.

**How can States better realise their obligations to children's rights in relation to the digital environment?**

Creating universal policy across all sector occupations and ensuring children and parents are kept up to date with digital development and the risks surrounding usage. Regardless of backgrounds or social economic status all children and parents have skills and knowledge to keep children safe.

Creating universal policy for developers of technology to ensure that age appropriate guidance and usage information is provided.

Although the American Academy of Paediatrics guidelines for screen time are in existence this is not commonly known or adhered to. Parents and those working with children must be supported to understand and comply with recommended screen time and understand the risk to increasing this time in terms of children’s development and the future skills as children grow into adults of the future.

There are very mixed messages about screen time and the effects of technology and brain development so universal policies would be welcome providing they were based on research evidence and updated regularly as technology and understanding develops.

**Is the realisation of children’s rights in the digital environment necessary to realise children’s rights in other environments?**

Yes, it is essential that any environment children access supports their rights to be safe and for their future growth and development.

The digital environment is one that most people now have access to including the most disadvantaged. It is important that we help all children access it safely without discrimination and in a way that is in their best interests. This includes Governments creating systems and passing laws that promote best use of digital technology, and parents and practitioners providing guidance and direction to children.