Ljubljana, May 2019

**Concept note for the general Comment on children's rights in relation to the digital environment – Slovenia's comment**

Slovenia would like to commend the Committee on the Rights of the Child to dedicate its next General Comment to the issues concerning children's rights in relation to the digital environment. Digital environment is related to the whole spectrum of children's rights, be it in their activities on-line or in their real lives, and in a positive and negative way.

We welcome the proposed structure of the General Comment and would in addition like to suggest that the beginning of the document introduces the guiding principles of the CRC in relation to the digital environment.

We would consider it very important for the General Comment to emphasize on one hand access to digital environment for all children (in order that all children can benefit from positive characteristics the digital environment brings), and on the other hand protection/safety in digital environment – all forms of violence, excessive use, sleep deprivation and physical harm (health risks) and stereotyping and over sexualisation.

We would like to suggest to the Committee to include in the document also a call to State Parties to develop measures (guidance) to empower parents and caregivers on how to protect children in this digital age.

We believe it would be very important that the General Comment addresses also the role of media and business entities – providers of digital services or digital platforms, and how they too can address potentially harmful content and behaviour.

As a member of the Council of Europe, Slovenia would like to bring the attention of the Committee to the Council's Guidelines to respect, protect and fulfil the rights of the child in the digital environment and the Recommendation CM/Rec (2018)7 of the Committee of Ministers of the Council of Europe to Member States on the Guidelines. Slovenia was very involved in the development of both documents. In 2017 the Council of Europe also published the brochure entitled Parenting in the digital age, for parental guidance for the online protection of children from sexual exploitation and sexual abuse.

With regard to the online protection of children from sexual exploitation and abuse we consider very important the use of appropriate terminology, contained in the Luxembourg Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse.

In addition Slovenia would like to inform on some of its activities at national level with regard to the protection of children's rights in the digital environment. It will be included in the Programme for Children 2019-2024, which the Ministry of Labour, Family, Social Affairs and Equal Opportunities prepares in cooperation with all relevant line ministries. The programme will focus mainly on the online safety of children to address the most pertinent issue. Data shows that majority of children in Slovenia, also those of young age, have unrestricted access to internet and new online technologies; however, children are not aware of all the risks that digital world and new technologies bring.

In Slovenia also several projects on the online safety and on help for digital additions are carried out. In addition, in a multigenerational centre one of the activities is focused on social inclusion of children and youth with special needs through computer workshops. As good practices in the fields of online safety and of digital additions we would like to mention two projects currently underway, in which children are a target group:

1. The project 'Click-Off' that addresses cyber violence and harassment as a form of violence against women and girls and manifestation of historically unequal power relations. It focusses mainly on awareness-raising and prevention activities. Its aim is also to strengthen the knowledge of children and youth, parents and witnesses how to prevent and respond to online violence. In order to include the largest number of children and youth activities are carried out in schools across Slovenia.
2. The centre 'Logout', which offers psychological counselling for children, young people and adults for digital addition, excessive use (overuse) of technologies and online abuse. It carries out also preventive programmes for the whole family and support groups parents and partners, children and young people.

Slovenia has also in place legislation to protect consumers from unfair commercial practices. The Consumer Protection Act against Unfair Commercial Practices also contains provisions aimed at preventing the exploitation of consumers who are particularly vulnerable due to age, physical or mental infirmity or credulity. It contains a list of practices that are in all circumstances considered unfair and are forbidden as such. Among these practices is also a direct incitement of children through advertisement to buy advertised products or pursue their parents or other adults to buy advertised products.