Digital Education Working Group

Report – July 2021

CNIL France

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Executive Summary

The core of the Digital Education Working Group's (DEWG) mandate aims to promote digital education that respects the rights and freedoms of all, and to raise awareness on the exercise of digital rights by children. The overarching objective is to allow children and young people to develop the competences and skills needed to grow into responsible digital citizens.

A brief overview of the achieved work will present the results of the implementation of the 2020-2021 action plan: this work was built upon exchanges of experiences, initiatives and resources between data protection authorities on top priority actions aimed at raising awareness on privacy issues for children, teenagers, adults and educators to further develop skills and competences as well as increase their ability to claim their data protection rights in the digital world.

At a time when educators, pupils and families have massively turned to social media, mainstream video-conferencing tools and available e-learning platforms, it was crucial to provide guidance to draw attention to the secure online tools specifically designed for teaching and education management.

One of the WG objectives 2021-2022 was to share tools and data protection awareness resources in order to facilitate educational distance learning during the health crisis. The CNIL and the CNPD, as WG workstream co-lead continued to refresh and reconfigure the CIRCABC resource platform to update and improve the quality of the e-library content. This included a new classification by types of teaching and training resources, completed with specific key categories to meet the current needs.

As a result, a new detailed table inventorying some 137 uploaded resources has been circulated by end of February 2021 (see appendix 2 the Excel table describing the content of the classified resources by topics, source, country and language such as *interactive learning tools, Lesson plans/ scenarios, Guides, memos, FAQs, safety measures, Videos on protecting Your privacy & tips , Comics, cartoons, online games targeted to the various public audience, namely teachers and educational staff, parents, children and young people by age groups).*

With the aim to accelerate and intensify the movement of updating the online library in relation to the top priority topics set this year, and to facilitate the taking-up of this tool for new users, a specific training video tutorial in English with French subtitles, was created with a corresponding PowerPoint presentation made available (i.e. how to access the platform, open individual accounts, or ask for notification of new uploaded resources).

In June 2021, the DEWG also consulted its members to first assess the impact of their preferred channels of communication, dedicated means of actions and awareness-raising campaigns on privacy topics aimed at intended public audiences. The survey also intended to consider whether the effectiveness of resources, media campaigns, games, print material or other online tools were developed by GPA Members on their own or where appropriate, in collaboration with institutional and associative committed stakeholders to amplify the impact of these actions and take advantage of adapted and diversified skills and knowledge.

The outcome of the report has brought to light some valuable conclusions on views and experience on the use of diversified awareness-raising activities to target young people. Globally, it is aimed at creating synergies and as such, should help to take advantage of the best education practices and privacy digital educational activities of GPA Members and their expert partners to adequately target

young people, parents and educators on these relevant issues. Concerning the effectiveness of evaluation of their educational materials, in view of the responses, around half of GPA members responding to the questionnaire resort to evaluations of their actions to assess their effectiveness.

The UNCRC's draft General Comment on the Rights of the Child in the Digital Environment was circulated in October 2020 by the DEWG to share the Committee's commitment to promote the consideration of children's evolving capacities and best interests in the implementation of policies relating to their rights in the digital environment. In this context, the DEWG submitted a contribution which was discussed and adopted on 15 November 2020 to support the UN project's orientations, and to make proposals with regard to the right to protection of children's personal data.

As a general observation, all the forecast developments of international initiatives pertaining to the exercise of children's rights over their data have been monitored by the DEWG. They revealed broad converging trends while not necessarily concerted or focused on similar scope of issues and were making room for gradual empowerment of children online. This issue is at the heart of public debate in many countries, such as in the UK, in Ireland, in the USA, in the Netherlands, in Germany and in France among others.

Children's rights are considered a GPA priority, something which aligns with the wide scope of issues mandated to the DEWG. The CNIL and the Garante, on behalf of the DEWG, have drafted and submitted a resolution on children's rights on 30 July 2021 and will seek the 2021 Closed Session participants' support for adoption.

Introduction

List of Digital Education Working Group (DEWG) members

Lead: FR - *Chair: CNIL, France - Marie-Laure DENIS & Pascale RAULIN-SERRIER*

Other delegations: Albania, Australia, Australia (Victorian DPA), Austria, Belgium, Bosnia and Herzegovina, Bulgaria, Burkina Faso, Canada (OPC), Canada (Ontario), Canada (Québec), Canada (Alberta), Cap Verde, Catalonia, Columbia, Croatia, Cyprus, Czech Republic, Estonia, Finland, Gabon, Ghana, Germany (and 3 regional LfDI), Georgia, Gibraltar, Greece, Hong Kong, Hungary, Ireland, Iceland, Israel, Italy, Ivory Coast, Jersey, Korea, Latvia, Lithuania, Luxembourg, Macao, Macedonia FYROM, Mali, Mauritius, Mexico (INAI), State of Mexico (INFOEM), Moldova, Monaco, Morocco, New Zealand, the Netherlands, Norway, the Philippines, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Switzerland (and Swiss Cantons), Senegal, Singapore, Tunisia, UK, Uruguay, USA (FTC), Council of Europe, EDPS.

As Chair, I am pleased to present this report to the Global Privacy Assembly (GPA) as an update on progress made in 2020-2021 by the DEWG. The Working Group has developed a work plan set up in a progressive phased approach for developing 3 major topics in line with the Capacity Building for the GPA Strategic direction.

Our GPA community has been putting great effort, as reflected in the current report, into addressing such a challenging and complex situation where awareness-raising initiatives on the rights and responsibilities in the digital environment were expected to largely target children, educators, but also parents and EdTech in the educational field in general.

Moreover, the DEWG has focussed on gathering and collating information from data protection authorities on the effectiveness of their awareness-raising activities for young people, evaluation and cooperation in this area.

It also monitored specific national consultations (ICO, DPC, and CNIL) and major international initiatives in relation to the exercise of children's rights.

The DEWG engaged also more closely with relevant international bodies in order to give the GPA a stronger voice in relevant global initiatives surrounding the child's rights in the digital environment.

In line with this, a proposal for a resolution on the topic of the digital rights of children has been drafted this year and will seek the 2021 Closed Session participants' support for adoption.

Working Group Activities

What has the Digital Education Working Group accomplished so far in relation to the 2020-2021 action plan?

<u>Action 1</u>: Share tools and data protection awareness resources to facilitate educational distance learning during the health crisis

Based on these objectives, the CNIL and the CNPD, as WG workstream co-lead continued to refresh and reconfigure the CIRCABC resource platform to update and improve the quality of the e-library content respecting a new classification by types of teaching and training resources including additional key categories to meet the current needs.

A great job was performed until December 2020, where the CNPD itself proceeded directly with the uploading of GPA members updated documents in the new folder architecture as partial deletion focus on the result to all of them. The new detailed table inventorying some 137 uploaded resources has been circulated by end of February 2021 (see appendix 1 the Excel table describing the content of the classified resources by topics, source, country and language such as *interactive learning tools, Lesson plans/ scenarios, Guides, memos, FAQs, safety measures, Videos on protecting Your privacy & tips , Comics, cartoons, online games targeted to the various public audience, namely teachers and educational staff, parents, children and young people by age groups).*

With the aim to accelerate and intensify the movement of updating the online library in relation to the top priority topics set this year, and to facilitate the taking-up of this tool for new users, the DEWG created a specific training video tutorial in English with French subtitles. The video offers clear and concise demonstrations, synchronized with images of the working group's website, which are to be viewed with a corresponding [PowerPoint presentation](#) (i.e. how to access the platform, open individual accounts, or ask for notification of new uploaded resources). The video tutorial can be accessed through the GPA website and is hosted on a password-protected Vimeo webpage. A confidential password to access the CIRCABC video was communicated to all GPA Members in May 2021. Arrangements to merge the videos and give visibility to the tutorial was greatly facilitated by the GPA Secretariat and ICO Communications department.

Next, statistics related to the number of visits and actual uploads needed to be accessed via the EU Commission (due to some technical specificities). Following this, a short evaluation of the input by GPA members which was planned to be carried out by the CNPD and the CNIL has been postponed. See next year's action plan to draw lessons from the pooling of new resources and visits and to consider any update of the platform for the benefit of GPA members.

Cf. Annex 1. DEWG 2021 CIRCABC platform overview supporting the video tutorial
Cf. Annex 2. DEWG 2021 Inventory of CIRCABC resources on Quarter 2

Evaluation activity

The DEWG has consulted GPA members in June 2021 to first assess the impact of their preferred channels of communication, dedicated means of actions and awareness-raising campaigns on privacy topics aimed at intended public audiences. The survey also intended to consider whether the effectiveness of resources, media campaigns, games, print material or other online tools were

developed by GPA members on their own or, where appropriate, in collaboration with institutional and associative committed stakeholders to amplify the impact of these actions and take advantage of adapted and diversified skills and knowledge.

The outcome of the report will entail a rich diversity of pragmatic design approaches, privacy advices and other sites' interfaces to reach the targeted audience that could obviously create synergies between the data protection and privacy authorities. There is a valuable repository to build upon in order to take advantage of the best education practices and privacy digital awareness-raising activities to adequately target young people, parents and educators. For instance, it is important to use a simple language to allow young people to feel concerned with these issues. Some common indicators and methods to use to assess the efficiency of educational actions will be discussed.

The final summary report and detailed compiled references from GPA member replies regarding children resources are subject to rereading by the contributors to the questionnaire online for any corrections or additions.

The main result findings established from 41 answers (out of 77 GPA members of the DEWG) to the questionnaire sent by the DEWG on June 2021 are presented below by thematic summaries as well as in the PowerPoint *in annex 3* with analytical graphs of the answers.

Regarding the geographic areas of GPA members having responded to the enquiry:
- 60% from Europe, 12% from Asia, 10% from North America, 7% from Latin America, 7% from Asia-Pacific and 2% from Near/Middle East.

See the 2021 short set of questions, *in annex 4* inviting GPA members to respond to 6 main topical questions, and provide useful links of relevant resources and webpages.

Concerning the resources developed and preferred channels of communication:
- To reach the target of young children (younger than 13 years old), DPAs prefer print resources (posters, fact sheets, guides, comics, board games...) and audiovisual media (TV series, commercials...) as ways to address information.
- Whereas to address teenagers, GPA members preferred channels of communication such as social networks, the use of influencers, artists or personalities and communicate via their website.
- To raise awareness among parents, the priority communication channels used are through fair, campaigns, interventions and via their own website.
- To support educators, the majority of GPA members' awareness-raising actions resort to the distribution of textbooks and other school resources, post dedicated information on their website, and also refer to other partners' websites or government portals.

Concerning the dedicated means:
- Out of 95 % of GPA members which mentioned they develop awareness-raising activities for young people, 58 % indicated they have in-house human resources dedicated to the production of resources for young people, whereas 32% do not and rely on external expertise.

Pertaining to specific cooperation developed in this area:

- In relation to the question on whether GPA members have entered into partnerships to develop digital education awareness-raising activities with young people, the results show that:
  87% of GPA members develop cooperation actions, 12% have not entered into any partnership

Regarding the types of partnership they develop in more detail among awareness-raising actions, several answers were proposed in the questionnaire. Results indicate that:
- 78% of the panel of authorities engaged in cooperation predominantly with public actors, including public broadcasting media for campaigns aimed at the public at large, child protection agencies, NGOs, universities in addition to governmental education authorities and schools acting as familiar institutional partners to implement educational programmes for young people.
- 43% chose to cooperate with data protection authorities, 41.5% with private actors (private audiovisual media, industry, Big Tech, research centres, consultancy agencies).
- An interesting trend reflects a real evolution and propensity to engage in collaborative actions up to 20% with influencers, artists or personalities.
- Among the 20% of initiatives developed in association with other partners, there are some remarkable partnerships structured by one Data Protection Authority as a "Digital Pact" created between private companies, foundations, public sector and media organisations where privacy is emphasized as an asset for public and private organisations and good practices on privacy protection and the fight against digital violence have to be followed by media and organisations with communication channels. There are partnerships extended to the Police Cyber Protection Unit, teachers' unions or between national regulatory authorities in a cross cutting innovative approach to benefit from synergies and joint expertise.

Concerning the effectiveness of evaluation of their educational materials, 58% of GPA members responding to the questionnaire resort to evaluations of their actions to assess their effectiveness, 42% do not. Among the quantitative indicators based on figures, the authorities resort to:
- audience measurement amounting to 29%,
- website traffic statistics to 42%,
- the number of articles published in the media to 30%,
- the number of subscribers on social networks to 27%,
- And other(s) to 17%.
In qualitative terms on the other hand, it appears that this approach is less used and based on surveys, and interviews to 25%, on resource audits to 15%, and resource tests to 7%.

When it comes to the development of standards, codes of practice, recommendations or advices, regarding websites or platforms used by young people, it is noteworthy that 56% of GPA members indicate that they have put in place:
- effective guidelines on consent,
- recommendations for providing specific protection measures by design with age-appropriate information on the websites, services and apps likely to be used by children,
- principles for a child-oriented approach to data processing,

- age-appropriate design codes for providers, and
- Other guidance to data protection at schools.

Cf. Annex 3. DEWG PowerPoint: 2021 Survey results of the enquiry on awareness-raising activities for children
Cf. Annex 4. DEWG 2021 Survey questionnaire on awareness-raising activities for children

<u>Action 2</u>: Consider drawing up joint recommendations with a view to presenting a draft resolution on the exercise of children's rights in the digital environment for adoption by the GPA in October 2021.

In view of the need to provide more information to children, as well as their parents and educators, about their rights in order to guarantee their effectiveness, the Digital Education Working Group conducted preliminary surveys last year.

First, the 2020 DEWG survey (*see <u>the</u>* <u>Summary report of 15 September 2020</u>) aimed at taking stock of the existing legal framework in the different States concerning the exercise of their rights by minors, and in particular their privacy rights. It was found out that there are legal provisions in countries that allow children to exercise their privacy rights. However, the framework remains relatively unclear as to who, children or parents on their behalf, can exercise these rights - bearing in mind the notions of digital maturity and legal capacity of children.

Second, a few other questions aimed at exploring whether the exercise of digital rights in practice by children themselves, or by their legal representatives and remedies with data controllers and data protection authorities in relay was easily accessible and understandable via online services. The survey results revealed that globally, authorities' websites did not offer provided dedicated information to minors on how to exercise their rights (*see the 2020 activity report*).

2.1 Draft Resolution on digital children's rights.

Children's rights are considered a GPA priority, something which aligns with the wide scope of issues mandated to the DEWG. As a consequence, the CNIL and the Garante, on behalf of the DEWG, have drafted and submitted a resolution on children's rights on 30 July 2021 and will seek the 2021 Closed Session participants' support for adoption.

In this sense the realization of children's digital rights implies informing minors, as well as their parents and teachers, about their content and how to exercise them.

To this end, the proposed resolution aims to address data controllers' responsibilities to provide for information on digital rights, complaints and reporting mechanisms that are prompt, accessible and presented in a comprehensible manner to children to ensure the implementation of children's rights in the digital environment even is operated by a parent or a guardian.

The draft text has also considered that to assert one's rights one must first know them. As such, it has been made clear that these rights consist of the possibility for the child to have access to data concerning him or her which are processed by a public authority or a private body, to have them deleted or to obtain the rectification of inaccurate or obsolete data, and also to be able to withdraw his or her consent or to object to the processing of his or her personal data.

In addition, it has been emphasized that this information must be presented to children in a way that is adapted to their age and capacity for understanding, but also accessible at all times and presented in such a way as to encourage them to learn more about their rights in the digital environment.

Moreover, the effectiveness of rights is also conditioned by the existence of rapid, accessible and appropriate remedies for minors in relation to data controllers and data protection and privacy authorities.

It is important to stress that the proposal of the Resolution drafted has duly taken on board a great number of the valuable comments expressed as key principles and recommendations in the joint contribution approved by the 70 members of the DEWG in November 2020 and submitted to the UNCRC draft General Comment (GC) No. 25 (2021) on the rights of the child in relation to the digital environment. The draft text of the resolution also results from the comprehensive overview summarized below conducted all over the year by the DEWG in relation to online child protections' initiatives.

2.2 Continue to map out major national and international initiatives on child protection and the exercise of children's rights online that could, as appropriate, impact the draft resolution on children's rights.

As briefly touched upon in the regular communications to GPA members, all these initiatives at the international level aimed to provide guidance on measures to ensure full compliance by government, and industry with their obligations to fully support children's right in the digital environment. As illustrated by the recent "General Comment on Children's Rights in the Digital Environment" of the UN or the actions of UNICEF, the OECD and the Council of Europe or the International Telecommunication Union (ITU).

This sub-section of the report presents some outcomes of the DEWG's work and monitoring on this issue with regard to the mapping of national and international initiatives:

- The **UNCRC's draft General Comment on the Rights of the Child in the Digital Environment** was circulated in October 2020 by the DEWG to share the Committee's commitment to promote the consideration of children's evolving capacities and best interests in the implementation of policies relating to their rights in the digital environment. In this context, the DEWG submitted a contribution which was discussed and adopted on 15 November 2020 to support the UN project's orientations, and to make proposals with regard to the right to protection of children's personal data. More precisely, the DEWG's contribution focused on the exercise of the rights of children, profiling and automated decision-making, commercial exploitation of children's data, the consideration of child-related specificities by public authorities and the private sector and digital education. This contribution was unanimously supported by some 74 DEWG's member Authorities and was made available on the ohchr.org website and the GPA website. In May 2021, the adopted General Comment No. 25 in relation to the Children's Rights in the Digital Environment was circulated together with the Poster for schools Know your rights! as well as a child-friendly version that should help GPA Members to make use of this in their related strategies and pedagogical approaches.

- In February 2021, the OECD ran a consultation on its **Draft Recommendation on Children in the Digital Environment** and on its **Draft Guidelines for Digital Service Providers**. As

suggested by the DEWG, the OECD Secretariat of the competent Group of Experts took this opportunity to invite GPA members to contribute with regard to the vital role that they play to engage and influence individual views on high standards of recommendations for children's protection online. Due to the tight deadline set by OECD, GPA Members contributed with their own opinion and comments on the shared document circulated by the DEWG. The Recommendation on Children in the Digital Environment, formally adopted on 31 May 2021 by the Ministerial Council, sets and updates the 2012 principles for promoting a safe and beneficial digital environment for children, recommendations on overarching policy frameworks. It also highlights the importance of international co-operation by developing collaboration among countries through international and regional networks, including in the development of shared standards.

- DEWG members will be invited to further raise the visibility of the Recommendation and support its effective implementation in the months to come. A first launch event will be organized and a Companion Document is being drafted as agreed upon by the OECD Group of Experts by mid-July 2021. Appropriate information will be shared with GPA members in relation to the objective to collect draft examples to share specific case studies (i.e. practical examples of child safety by design, child participation) and examples of good practice (i.e. specific legal frameworks, examples of single oversight bodies) that could be integrated into the "Applicability" section of the Companion Document by August/ September 2021.

- The 2021 final report of the **Special Rapporteur on the right to privacy circulated in May 2021** was distributed within the DEWG (available in several UN languages at A/HRC/46/37) which addresses in Part II (p. 11) children's privacy, particularly privacy's role in supporting autonomy and positive participation in society. This report has interestingly included some GPA members' contributions among other organisations and provides guidance and recommendations on this issue outlined in the final part.

- The DEWG has continued to map out and communicate about major international texts, EU strategies as well as key national recommendations having made progress on this priority topic and that could, as appropriate, impact the GPA draft resolution on digital children's rights:
  o The EU 2030 Digital Compass which proposes a broader digital agenda seeking to "protect and empower children in the online space";
  o The EU Strategy on the Rights of the child adopted on 24 March 2021 which includes a chapter on the rights of the child in the digital environment and consider Data protection as specific areas for which more action is needed.
  o The UK ICO's work in progress to produce supplementary guidance and tools with the digital design community that can help shape the ICO's work on the Children's Code;
  o The DPC's public consultation published by the Data Protection Commission of Ireland in late December 2020 in relation to the 2020 Fundamentals for a child-oriented approach to data processing acting as guidance document (a final version of the Fundamentals is expected to be published around September time);
  o The French CNIL's 8 recommendations published in June 2021 about pending issues such as applicable national law vs the reality of digital practices among young children, criteria to encourage children to exercise their privacy rights, checking parental consent vs respecting the child's privacy, and data controller's responsibility vs

enhanced guarantees relying on privacy by design and by default, including a design approach interface conducted with children in workshops published on the [CNIL Data and Design platform](#).

- o The ["Code for Children's Rights"](#) launched on March 2021 in the Netherlands, commissioned by the Dutch government, which consists of ten basic principles aimed at providing guidance to designers and developers of digital products on how to guarantee the protection of the fundamental rights of children when designing and developing apps, games, smart devices and other digital technology.
- o The two [pieces of legislation](#) emerging in the US Congress in June 2021 (a Senate and a House Bill) to develop the so-called "COPPA 2.0," that seeks to update existing protections for kids and teens online, create a more robust regulatory framework and also extend the age of a minor covered.
- o The German [Youth Protection Act](#) strengthening the rights and the protection of children on platforms obliging platform providers to take appropriate specific precautionary measures to counter risks explicitly named in the German legislation.
- o The UK proposed [Online Safety Bill](#) providing a precautionary and risk-based approach to the digital world with a particular emphasis on protecting children.

<u>Action 3</u>: Conduct work merging respective priorities of the DEWG and the Working group on Ethics and Data Protection in Artificial Intelligence

Why such a recurring objective?

The societal and environmental impact of data intensive technologies should be scrutinized via real cases applications, with regards to data in education, the processing of school data and other traces of learning analytics.

In educational settings, this issue has not been yet further analyzed in close cooperation within the DEWG where specific dedicated expertise from GPA members would be welcome to support and lead further initiatives on this issue, if considered as a priority topic, as touched upon hereafter.

In relation to the automatic processing of personal data, priority action should ensure that AI applications do not undermine the human dignity, the human rights and fundamental freedoms of every child whether as an individual student, in particular with regard to the right to non-discrimination.

As part of its 2019-2021 work programme, the GPA Ethics and Data Protection in AI Working Group (AIWG) conducted in May 2021 a survey on the GPA members' capacity and expertise in addressing ethical and data protection issues in AI systems. As discussed between working group leaders, a few open questions might contain some elements related to education.

Preliminary assessment of the survey is e still expected to be shared with the DEWG if containing some elements related to education. The analysis of those answers is still pending, and further coordination will be arranged to verify this aspect jointly and give positive follow-ups.

As a preliminary initiative, it would thus lay the groundwork for more detailed work and exploration in the coming year(s) on the impact of AI technologies in the education sector.

Forward looking plan 2021-2022

In 2021-2022, the Digital Education Working Group (DEWG) plans to continue the exchange of experiences between data protection and privacy authorities in four priority areas of action in line with the Strategic Plan of the GPA.

Minors are particularly vulnerable to the risks associated with the digital environment given their increasingly massive and early digital use. The global COVID-19 pandemic has accelerated, as never before, these practices, which are also taking place in the growing connected social and educational environment.

The protection of children's online privacy is more than ever at the heart of public debate in many countries as well as at the level of international organisations. Furthermore, this protection, together with the exercise of children's rights, can only be achieved through effective cooperation between data protection and privacy authorities, in a context where a high number of actors are involved in the digital sphere.

As a consequence, the Working Group on Digital Education considers it is fully relevant in its 2021-2022 work plan to strengthen the actions already undertaken so far and to focus on the objectives of implementing and accompanying the resolution on children's rights in the digital environment (provided that *the draft resolution is adopted in October 2021, the main lines of action of the plan will nevertheless be maintained for adoption*).

In order to finalize the work plan, GPA members will be invited to communicate specific policy issues (scope, topics, and output) and agree with them; where appropriate some thematic actions might be extended over a two years' work plan to reach an effective implementation cooperation:

Priority Action I - **Undertake support initiatives to facilitate the exercise of the rights of children and of their parents/legal guardians in a manner appropriate to their maturity in the digital environment:**

- Encourage, at the national/ regional level, the creation and distribution of up-to-date age-specific resources aimed to raise awareness among children, young people, parents and schools about digital rights and how to exercise them:
    - o For instance, members will be invited to provide and share (in line with priority action III below) a wide range of scenarios and ideas on how to help children and adult audiences understand their rights and responsibilities and to facilitate how to make use of them in the digital environment.
- Develop FAQs and share guidance on how children or legal guardians can exercise their own rights in practice on social platforms and networks in case of cyber-violence or other violations of their own rights:
    - o e.g. share report procedures, content removal and complaint mechanisms that are accessible and appropriate for children
- In particular, teaching aids could be created to evaluate digital knowledge and to learn such knowledge through testing (applicable to both children/adults):
    - o e.g. resorting to games, quizzes, online platforms for assessing or certifying the digital skills of pupils and teachers in focusing mainly on children's rights online, the legal

remedies available in relation to their digital rights or on even associating all the citizen dimension guaranteeing respect for private life.

Priority Action II - **Support the fundamental role of parents and educators within the digital environment, through educational programmes, actions and awareness campaigns:**

- Assess teachers' perceptions of their teaching methods related to data protection topics:
    o As part of the upcoming activities, a survey questionnaire will be created and distributed to a panel of schools according to school levels in every country, in order to evaluate the current pedagogical practices of teachers, their expectations but also the hurdles they may face when raising awareness of responsible digital use (a background questionnaire will be submitted by the CNIL);
- Strengthen cooperation between GPA Members in raising parents' awareness of the challenges of digital parenting, according to the age of the child:
    o Encourage the exchange of good practices in the distribution of information to these audiences (e.g. guides, FAQs, supporting strategies, to be shared in line with priority action III below)
    o Jointly explore the challenges related to privacy-friendly parental control devices by sharing available studies or evaluation reports published either by public actors or any other operators concerned, etc.

Priority Action III – **Draw up a collection of good practices concerning adequate communication channels and media on responsible digital use to the target groups of children, young people, adults and educators:**

- Identify accessible, user-friendly information adapted to young people's age and maturity about their rights and how to exercise them, and the assistance and complaint procedures available to them, particularly with regard to the services they use the most (social networks, games and video sharing platforms, etc.);
- Share methods and criteria for quantitative and qualitative evaluation of the audiences to be sensitized, ranging from the youngest to adults, in order to give a practical follow-up to the 2021 survey on the state of play and the methods used to evaluate the effectiveness of educational actions and media tools for raising awareness;
    o GPA members will share their communication expertise on using some specific formats, tonality and types of content suitable to the various targets
- Continue to share and promote on the CIRCABC online resource platform of quality tools, codes, educational materials produced or promoted by data protection authorities pertaining to actions I - II - III - IV (see below).

Priority IV - **For online service providers, publish guidance (and other tools) to help organisations comply with their obligations to provide minors with online services in a clear, comprehensible but also child-friendly manner:**

- Encourage various industry actors in the digital business sector to develop Codes of Conduct:

- o Accompany them with practical guidelines and advice on how to design interfaces that are transparent, simple and easy to understand for children according to their age and maturity;
- o Review existing arrangements to explain to children the steps and remedies available to exercise their digital rights on platforms and, where appropriate, consider drafting a joint letter by GPA Members (with the assistance of their complaints and/or supervising departments) to remind companies of their accountability.

Conclusion

During the consultation phase of the GPA draft Strategic Plan 2021-2023, the DEWG moderator underlined that the GPA should continue to give priority focus to the theme of digital children's rights, and enhance related practical cooperation on children's rights and responsibilities in the digital environment across GPA Members and through all working groups.
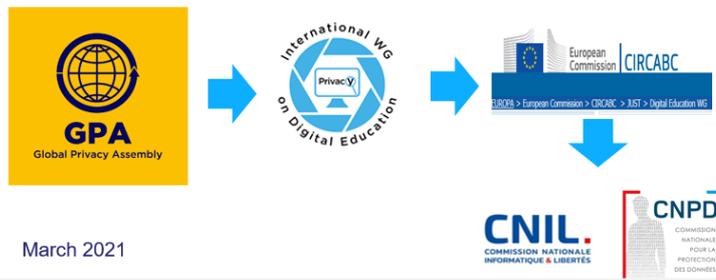
The priority given to the subject of digital children's rights and the cooperation between GPA members demonstrate that the Global Privacy Assembly has the unique potential to engage more closely with relevant international bodies and to develop a stronger voice in the global debate and initiatives surrounding the realization of children's rights in many areas.

The common work will allow for further detail to be set out in the annual DEWG's forward plans to get all key players committed in creating the appropriate conditions to effectively implement digital citizenship.

Annexes

Annexe 1. DEWG *PowerPoint*: 2021 CIRCABC platform overview supporting the video tutorial

CIRCABC online library
SHARING DIGITAL EDUCATION TOOLS ON A WEB PLATFORM

2019 → Survey, conclusions
2020 → Improvement project

CNIL

CNPD

CIRCABC online library
SHARING DIGITAL EDUCATION TOOLS ON A WEB PLATFORM

2021 → 70+ DPAs from Europe, Africa, Middle/Near East, Asia, North America, Latin America, Pacific

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CIRCABC online library
SHARING DIGITAL EDUCATION TOOLS ON A WEB PLATFORM

2021 → Communication campaign
→ Online tutorial for DPAs to make them independent on updating their material on the platform

✓ how to access the platform
✓ how to open individual accounts
✓ how to use this account to add new material by yourself
✓ how to set the language in English or French
✓ how to subscribe to notifications to get informed as soon as new resources are being added on the platform!

GPA
Global Privacy Assembly

International WG on Digital Education

Annex 2. DEWG see the attached *Excel* table providing the 2021 Inventory of CIRCABC resources

	Sub classification	Sourcing / Contributor	CIRCABC platform - Inventory of resources Title of the resource	Language version	Quarter 2. 2021 Topics
			A. LEGAL INSTRUMENTS AND RESOLUTIONS ON PRIVACY EDUCATION AND DIGITAL RIGHTS		
			A. INSTRUMENTS JURIDIQUES ET RESOLUTIONS SUR L'EDUCATION NUMÉRIQUE ET LES DROITS EN LIGNE		
	a) International legal instruments on privacy education and digital rights	No resource	n/a		
	b) National legal instruments on privacy education and digital rights	No resource	n/a		
	c) Resolutions / Declarations on privacy education and digital rights	ICDPPC (40 TH)	" Resolution on e-learning platforms "	french /english	Statement
		ICDPPC (35TH)	" Resolution on a digital education for all "	english	Statement

Feuil1

	Sub classification	Sourcing / Contributor	Title of the resource	Language version	Topics
			B. SURVEYS - PUBLICATIONS ON DIGITAL EDUCATION, TRAINING, AI IN EDUCATION		
			B. ÉTUDES - PUBLICATIONS SUR L'ÉDUCATION AU NUMÉRIQUE, LA FORMATION, L'IA DANS L'ÉDUCATION		
	a) General studies - reports on digital education, training, AI in education	INAI	"Suggested minimum criterias for contracting cloud computing services that involve the processing of personal data"	spanish	AI in education / Sensitization *Cloud computing, data protection*
		L'esprit sorcier (MAIF foundation)	" All connected - How do I protect my private life online ? "	french	Awareness *Privacy online*
	b) Specific studies - publications by DPAs, and the DEWG related to digital education, training, AI in education	RED (Red Ibericoamericana de Protección de datos)	" Specific guidelines for compliance with the principles and rights that govern the protection of personal data in AI projects " /	english / spanish	AI in education / Awareness *Artificial intelligence, compliance*

	Sub classification	Sourcing / Contributor	Title of the resource	Language version	Topics
			C. AWARENESS-RAISING ON THE EXERCICE OF DIGITAL RIGHTS		
			C. SENSIBILISATION À L'EXERCICE DES DROITS EN LIGNE		
	a) Educational resources on children's rights	European Schoolnet	" The web we want"	french	Actitvities / Awareness *Rights online, tools, advices about online privacy*
		CNIL	" More rights for your datas "	french	Awareness / News *Rights online, advices*
		LUMNI (Minstry of Education plateform)	" What is the right to be forgotten ? "	french	Awareness *Rights online*
	b) Procedure for requesting access, information intended for children	Bee Secure	" RGPD - Examples "	french	Information *Role-playing, Adults / Kids*
	c) Complaints mechanisms for minors	No resource	n/a		
	d) Consultations - Surveys - Study reports	GRA	" Privacy Awareness School Survey "	english	Statement *Initiatives report, online platforms questions*

D. EDUCATIONAL RESSOURCES FOR STUDENTS				
D.RESSOURCES PEDAGOGIQUES POUR LES JEUNES				
	Savoir*Devenir / Freya Games	Agent 001 " Data is forever "	french	Activities / Awareness *Serious game, Data protection,*
	Council of Europe	" Beat the virus "	french /english	Activities / Awareness *Game, Data protection*
	Bee Secure	" Bibi on the web "	french /english/ luxembourgian	Awareness *Risks*
	Bee Secure	" BIG DATA : Who does what with my data ? "	french	Awareness *Navigating online, advices*
	Bee Secure	" Big Data : General Data Protection Regulation "	french	Information *web economy, advices, navigating online*
	MAIF Foundation	" Camille goes through your data and uses it "	french	Video *Sensitisation, Risks*
	CLEMI	" Comic book In Juliette's head "	french	Comic Book Awareness about screen-activity, social medias
	LUMNI (Minstry of Education plateform)	" 8InTheWeb "	french	Videos Awareness, Advices, Data protection, rights online, social medias, navigating online
				Videos

E. STOCKTAKING ON NATIONAL COMPETITIONS				
E. PRATIQUES ÉDUCATIVES DE CONCOURS NATIONAUX				
a) Inventory of DPAs competitions	DEWG	port on running data protection competitions at youth organize	french /english	Guide *Guidelines, advices*
b) Guide for Data protection COImpetitions	DEWG	" Guide for youth competitions, final (September 2017) "	french /english	Guide *Advices, method for competition*
F. EDUCATIONAL RESSOURCES FOR PARENTS				
F. RESSOURCES PEDAGOGIQUES PARENTS				
	France Culture	" PEGI awareness campaign "	french	Videos Awareness about violence in video games
	Council of Europe	" Easy steps to held your child become a digital citizen "	english / french	Guide *Advices for parents, being online, well-being online, rights online*
	INC Consomag / ALLDC NGO	" Connected objects : how to keep control of your data	french	Video *Advices concerning IoT*
	CLEMI / Canopé	" The all-screen family "V 2	french	Guide *Advices for parents, fake news, social medias, activities, violence on screen*

	A	B	C	D	E
87			**G. TEACHING RESSOURCES**		
88			**G. RESSOURCES POUR LES FORMATEURS**		
89	a) Competency Frameworks	Council of Europe	The reference framework of competences for democratic culture	english/french	Reference framework *Referential model, guidelines, advices*
90		PFPDT	" Data Protection, information pack "	french	Reference framework *Advices, online privacy, social medias, risks, smartphones, IoT*
91		DEWG	" Data Protection Competency Framework "	english/french	Competency framework *Principles, advices, skills and knowledge*
92		Éduscol (Ministry of education)	" Digital Competency Framework "	french	Reference framework *Referential model, skills referential, evaluation and certification*
93		Council of Europe	The reference framework of competences for democratic culture	french/ english	Reference framework *Referential model, guidelines, advices*
94		ANIMAFAC	" Digital Literacy "	french	Pedagogical support *Guidelines, principles, vocabulary*
95		PFPDT	" International study on initiatives digital education by DPAs (13-15 y/o) " 1	french	Pedagogical support *Role playing, activities, exercices and solutions, awareness about data protection*

	A	B	C	D	E
122		PFPDT	" DP Lessons for 16-19 y/o - FR "	french	Pedagogical support *Role playing, activities, exercices and solutions, awareness about data protection*
123			**H. TRAINERS MATERIAL**		
124			**H. FORMATIONS DES ENSEIGNANTS**		
125	a) Questionnaire to evaluate the level of trainers	No resource	n/a		
126	b) Trainer's pack	Association Class'Code / INRIA	" Class'Code	french	Pedagogical support *Tool, access to educational modules, activites, videos*
127		CNIL	" MOOC CNIL - l'atelier RGPD "	french	Pedagogical support *Tool, access to educational modules*
128			**I. E-LEARNING PLATFORMS AND REMOTE LEARNING**		
129			**I. PLATEFORMES EDUCATIVES EN LIGNE - ENSEIGNEMENT À DISTANCE**		
130		INAI	" Guide for personal data subjects "	spanish	Pedagogical support *Advices, Rights online*
		SESAME / MINTIC / CANAL Trece / ICBF (Colombie, Argentine)	" Monsters on line "	spanish	Pedagogical support *Awareness, Role-playing videos*

Survey results on the effectiveness of awareness-raising activities for young people
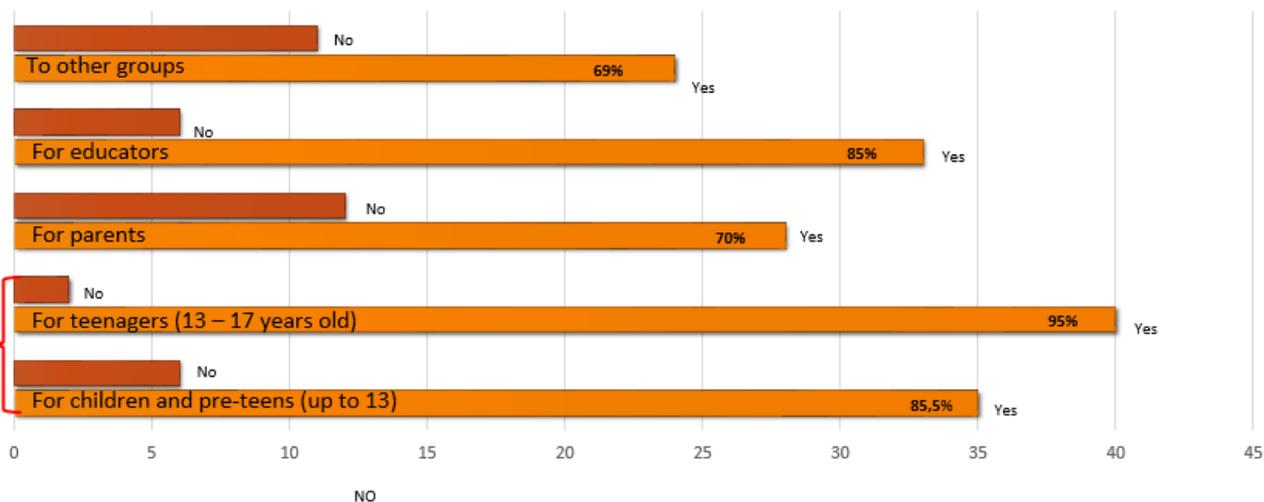# Evaluation, Cooperation and Best practices of DPAs in this area
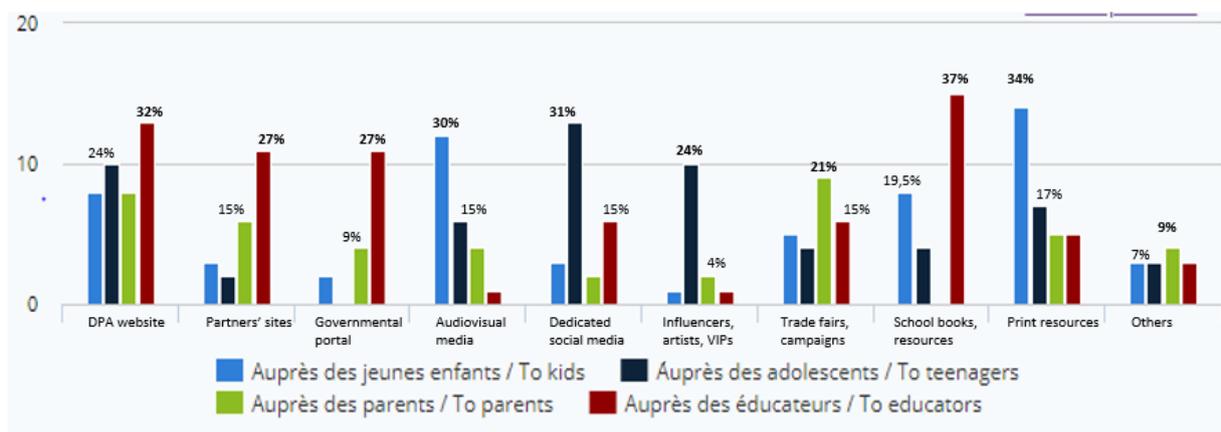
DEWG QUESTIONNAIRE JUNE/JULY 2021

Panel of responding authorities

| Geographic areas	Countries
25 DPAs from Europe	Germany (Rhineland Palatinate) ; Germany(Berlin) ; Germany(Hessen); Germany (North Rhine Westphalia); Albania ; Austria ; Cyprus ; Spain ; Spain (Catalonia) ; France ; Georgia ; Gibraltar ; UK ; Greece ; Hungry; Ireland ; Iceland ; Italy ; Jersey ; Lithuania ; Luxembourg ; Norway ; Poland ; Portugal ; Slovenia ; Switzerland
4 DPAs from Africa	Burkina-Faso; Gabon ; Morocco ; Senegal
4 DPAs from North America	Canada ; Canada (Ontario) ; Canada (Alberta) ; United-States
3 DPA from Latin America	Colombia ; State Mexico (INFOEM) ; Mexico (INAI)
3 DPAs from Asia-Pacific	Australia (Victoria); Hong-Kong ; the Philippines
1 DPA from Near Middle-East	Israel

1) Have you developed on your own initiative, i.e. by yourself or in collaboration data protection awareness-raising activities for young people that are still useful or topical specifically for… ?


To other groups — No / Yes 69%
For educators — No / Yes 85%
For parents — No / Yes 70%
For teenagers (13 – 17 years old) — No / Yes 95%
For children and pre-teens (up to 13) — No / Yes 85,5%

NO

2) What are your preferred ways as of today to address information to young people, parents and educators?

DPA website: 24%, 32%
Partners' sites: 15%, 27%
Governmental portal: 9%, 27%
Audiovisual media: 30%, 15%
Dedicated social media: 31%, 15%
Influencers, artists, VIPs: 24%, 4%
Trade fairs, campaigns: 21%, 15%
School books, resources: 19,5%, 37%
Print resources: 34%, 17%
Others: 7%, 9%

Auprès des jeunes enfants / To kids
Áuprès des adolescents / To teenagers
Auprès des parents / To parents
Auprès des éducateurs / To educators

23

3) Do you pursue a policy of awareness-raising activities for young people?
If Yes, do you have internal human resources dedicated to the production of educational materials for minors ?

☞ 95 % of DPAs develop awareness-raising activities for young people, 5% do not
☞ 58 % have in-house human resources dedicated to the production of resources for minors, 32% do not and rely on external expertise
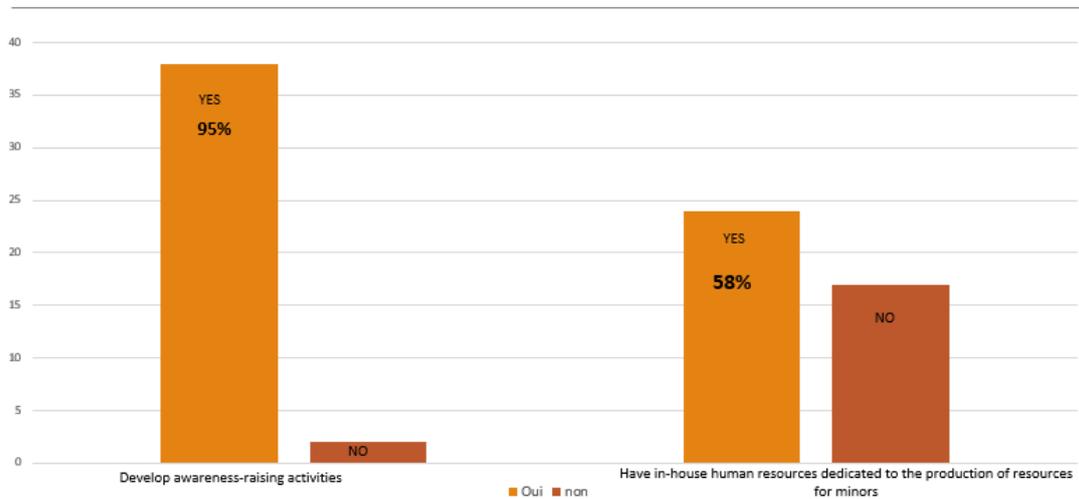

4) Do you seek for opportunities of partnerships to develop your awareness-raising activities? If Yes, whom are these partnerships concluded with..?

☞ 87% of DPAs develop cooperation actions

☞ 12% of DPAs have not entered into any partnership
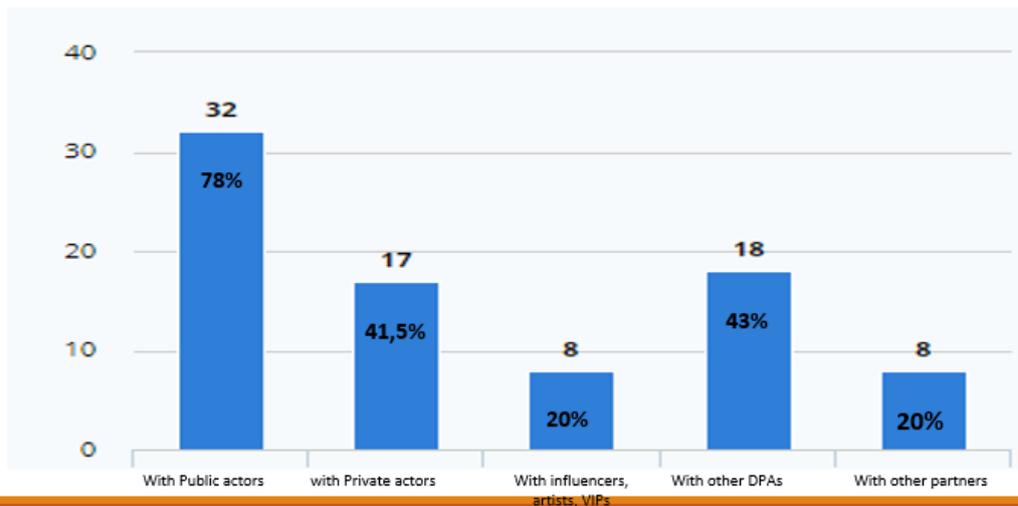
5) Do you evaluate the effectiveness of your actions towards young audiences?
   If such an assessment is made, which tools are used?

☞ **58% of DPAs resort to evaluations of their actions to assess their effectiveness, 42% do not**
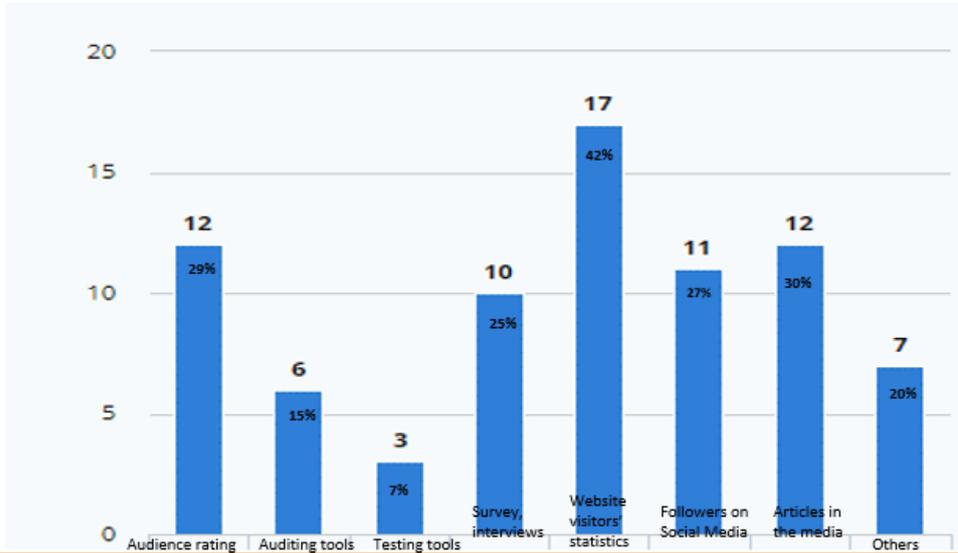
6) Has your authority promoted standards or contributed to the development of codes of practice, recommendations or advices* for those responsible for websites or platforms used by young people?

*Examples: Age verification systems, parental consent, information to minors, specific protection measures (reinforced default settings, limitation of profiling, etc.)

☞ **56% of DPAs indicate that they contribute to the production of standards, codes of conduct, recommendations or practical advice* for managers of sites or platforms used by young people**
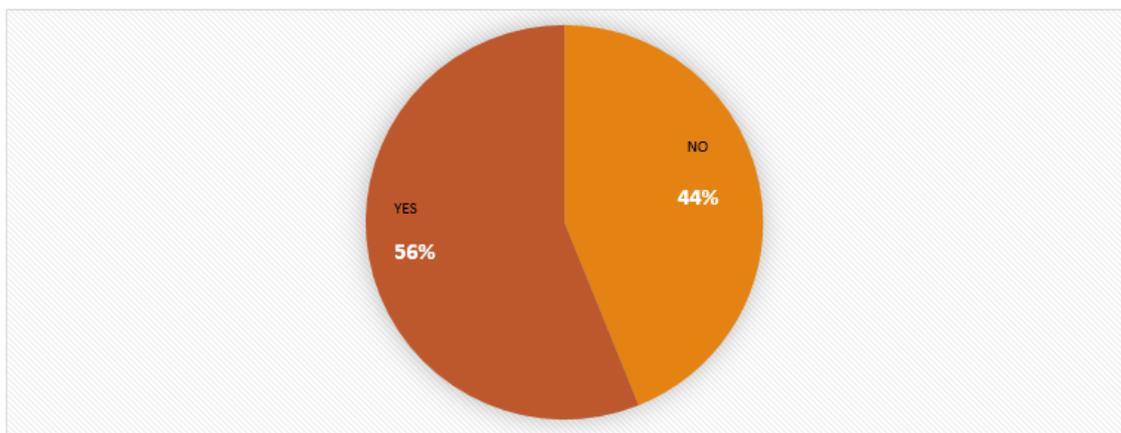
Annex 4. DEWG 2021 Survey questionnaire on awareness-raising activities for children

Plan d'action 2020-2021 - DEWG Work Plan   04.05.2021

Questionnaire d'enquête du DEWG sur l'efficacité des actions de sensibilisation auprès des jeunes : évaluation, coopération et bonnes pratiques des APD en la matière (actualisation de l'enquête 2014 du DEWG**)**

DEWG questionnaire on the effectiveness of awareness-raising activities for young people: evaluation, cooperation and best practices of DPAs in this area (update of the 2014 DEWG survey**)**

To be returned by framaforms link to pserrier@cnil.fr *before 28 June 2021*.

- **Identité / Identity**

Nom de l'autorité de protection des données ? / Name of the Data protection authority ?

…..

Actions de sensibilisation - Awareness-raising actions

- **Conception de ressources - Resource development**

1) Avez-vous développé à votre initiative, i.e. par vous-même ou en collaboration, des actions de sensibilisation et des ressources à la protection des données en direction des jeunes qui sont encore utiles ou d'actualité s'adressant plutôt... ?

1) Have you developed on your own initiative, i.e. by yourself or in collaboration data protection awareness-raising activities for young people that are still useful or topical specifically for...?

Aux enfants et pré-adolescents (jusqu'à 13 ans)? / For children and pre-teens (up to 13 years old)?
○ Oui / Yes

○ Non / No

Aux adolescents (13-17 ans)? / For teenagers (13-17 years old)?
○ Oui / Yes

○ Non / No

Aux parents ? / For parents ?
○ Oui / Yes

○ Non / No

Aux éducateurs ? / For educators ?

○ Oui / Yes

○ Non / No

[   ]   Auprès d'autres relais ? / To other groups of people ? ………..

- **Canaux de diffusion - Channels of communication**

2) Quels sont vos canaux de diffusion prioritaires à ce jour vers les cibles jeunes, les parents et les éducateurs ?

2) What are your preferred ways as of today to address information to young people, parents and educators?

Choisissez parmi les propositions ci-dessous / Choose among the options below

Choisissez pour chaque groupe le canal de diffusion privilégié / Choose the preferred distribution channel for each group

	Auprès des jeunes enfant To kids	Auprès des adolescents To teenagers	Auprès des parents / To parents	Auprès des éducateurs/ To Educators
Site internet de l'APD / DPA website				
Sites de partenaires / Partners' sites				
Portail gouvernemental / Governmental portal				
Médias audiovisuels (séries TV, spots...) / Audiovisual medias (Series, commercials..				
Réseaux sociaux dédiés / Dedicated social medias				
Influenceurs, artistes, personnalités / Influencers, artistes, well-known public figures				
Salons, campagnes, interventions / Trade fairs, Campaigns, interventions				
Manuels scolaires et ressources scolaires analogues / School books and similar school resources				
Ressources Print (posters, fiches pratique guides, BD, jeux de plateau) / Print resources (posters, factsheets, Guide Comics, board games)				

Autre(s) / Other(s)					

Pourriez-vous partager quelques liens ? (URL) / Could you share some (URL) links ?
…………

- **Moyens - Dedicated means**

3) Poursuivez-vous une politique orientée vers des actions de sensibilisation auprès des publics jeunes?

3) Do you pursue a policy of awareness-raising activities for young people?

A propos des actions de sensibilisation... / Concerning the conduct of awareness-raising activities...

○ Oui, nous conduisons de telles actions / Yes, we pursue such actions

○ Non, nous ne réalisons pas d'actions de sensibilisation / No, we do not pursue such actions

Disposez-vous de ressources humaines internes dédiées à la production d'outils pédagogiques pour les mineurs ? / Do you have internal human resources dedicated to the production of educational materials for minors ?

○ Oui / Yes

○ Non / No

Observations (si besoin) / Comments (if any) :…………..

- **Partenariats et collaborations - Partnerships and cooperation**

4) Concluez-vous des partenariats pour développer vos actions de sensibilisation ?

4) Do you seek for opportunities of partnerships to develop your awareness-raising activities?

Choisissez une réponse / Choose an answer
○ Oui / Yes

○ Non / No

○ Ne sais pas / Do not know

Ces partenariats sont conclus avec ... / Are these partnerships concluded with...

☐ **Des acteurs publics** (médias audiovisuels, universités, agences de protection de l'enfance, ONG...) / **Public actors** (audiovisual media, universities, child protection agencies, NGO's...)

☐ **Des acteurs privés** (médias audiovisuels, industrie, GAFAM, centres de recherches, agences de conseils / **Private actors** (audio-visual media, industry, GAFAM, research centers, specialized consultancy agencies, etc.)

☐ **Des influenceurs, artistes, Personnalités / Influencers, artists, well-known public figures**

☐ **Des autorités de protection des données / Data protection authorities**

☐ Autre(s) / Any other

Commentaires / Comments …………

- **Méthodes d'évaluation - Evaluation methods**

5) Evaluez-vous l'efficacité de vos actions en direction des jeunes publics ?

5) Do you evaluate the effectiveness of your actions towards young audiences?

Choisissez une réponse / Choose an answer

○ Oui / Yes

○ Non / No

○ Ne sais pas / Do not know

Si une telle évaluation est faite, à l'aide de quels outils est-elle réalisée ? / If such an assessment is made, which tools are used?

☐ Mesures d'audiences / Audience rating

☐ Audits de ressources / Auditing tool

☐ Tests de ressources / Testing tool

☐ Sondages, interviews / Surveys, interviews

☐ Statistiques de fréquentation du site / Website visitor's statistics

☐ Nombre d'abonnés sur les réseaux sociaux / Followers on social media

☐ Articles publiés dans les médias / Articles published in the media

☐ Autre(s) / Any other

Préciser tout autre outil d'évaluation quantitatif ou qualitatif / Specify any other quantitative or qualitative assessment tool ………………

- **Production de recommandations à destination des publics jeunes - Development of guidelines aimed to young audiences**

6) Votre autorité a-t-elle contribué à la production de normes, de codes de conduite, de recommandations ou de conseils pratiques (1) en direction des responsables de sites ou plateformes utilisés par les jeunes publics ?

> *(1) Exemple : systèmes de vérification de l'âge, consentement parental, l'information des mineurs, autres mesures de protection (confidentialité renforcée par défaut, limitation du profilage, etc.)*

6) Has your authority promoted standards or contributed to the development of codes of practice, recommendations or advices (1) for those who are responsible for websites or platforms used by young people?

> *(1) Examples: Age verification systems, parental consent, information to minors, specific protection measures (reinforced default settings, limitation of profiling, etc.)*

○ Oui / Yes

○ Non / No

<u>Si oui,</u> pourriez-vous nous en communiquer les références de ces recommandations ? / If so, can you provide references for these recommandations ? …………………

Merci de votre contribution ! / Thank you for your contribution!