

UNCRC General comment No. 25 5th Anniversary Joint Letter

2 March 2026

Five years ago, the world made children a promise with the adoption of UNCRC General comment No. 25. It affirmed that the rights enshrined in the most widely ratified human rights treaty in history – the UN Convention on the Rights of the Child – apply fully in the digital environment.¹ Today, one in three internet users is a child,² and digital technologies increasingly mediate all aspects of their lives – from the classroom to the playground, from first friendships to how they see themselves.

UNCRC General comment No. 25 reflects the global consensus that all children hold the same rights and opportunities online as offline,³ recognizing that specific measures are required to close digital divides and ensure existing inequalities are not exacerbated, including on the basis of gender and origin.⁴ It makes clear that children's rights are non-negotiable and must be the foundation of the digital world, not an afterthought.

Significant progress has followed. Across every continent, multilateral, regional, and national institutions have begun enshrining age-appropriate design standards and holding tech companies accountable for respecting children's rights by design and default.⁵

Yet, children around the world are still growing up in a digital environment designed without their distinct rights, needs, and vulnerabilities in mind. Worse, tech companies frequently continue to deliberately design digital products and services to maximize profit at children's expense by systematically amplifying content, contact, conduct, and contract risks.⁶ This commercial exploitation is further exacerbated by the rapid spread of AI,⁷ EdTech,⁸ and emerging technologies.

At a time when international cooperation on children's rights is more important than ever, recommitting to implementing the standards set out in UNCRC General comment No. 25 is an opportunity to build on global support and UN Member States' unanimous commitment to protecting the rights of the child in the digital space.⁹

We call on governments, regulators, and legislators worldwide to hold businesses accountable for ensuring that technology impacting children is rights-respecting and age-appropriate by design and default. UNCRC General comment No. 25 is unambiguous: this responsibility lies squarely with tech

¹ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 4.

² Livingstone, S., Carr, J., & Byrne, J. (2015). *One in Three: Internet Governance and Children's Rights*.

³ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 4.

⁴ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 11.

⁵ Sylwander, K & Livingstone, S. (forthcoming). *Mapping the global impact of UNCRC General comment No. 25 on children's rights in the digital environment*.

⁶ Amnesty International. (2023). *"I Feel Exposed": Caught in TikTok's Surveillance Web*; OECD. (2021). *Children in the Digital Environment: Revised typology of risks*.

⁷ 5Rights Foundation. (2025). *Children & AI Design Code*.

⁸ Human Rights Watch. (2022). *"How Dare They Peep into My Private Life?"*.

⁹ United Nations. (2024). *Global Digital Compact*, paras. 23(c) and 31(b).

companies.¹⁰ The era for voluntary promises has passed, States must ensure businesses fulfil this duty,¹¹ and companies must proactively identify and mitigate negative impacts upstream and embed privacy and safety by design.¹²

Five years of implementing UNCRC General comment No. 25 have built a solid evidence base demonstrating that embedding age-appropriate design delivers concrete, measurable improvements to children's experiences.¹³ The global frameworks are in place, and international best practices provide a blueprint for their implementation.¹⁴

What remains is the political will to act and deliver the digital world we promised children – one designed to protect and uplift them, not exploit them.

To that end, we urge States to fulfill their obligation to protect children's rights in the digital world by:

1. Explicitly protecting children as every individual below the age of 18,¹⁵ recognizing their diversity and evolving capacities.
2. Protecting children across all digital spaces they are likely to access or be impacted by.¹⁶
3. Making children's best interests a primary consideration.¹⁷
4. Accounting for children's presence to provide age-appropriate experiences.¹⁸
5. Mandating Child Rights Impact Assessments (CRIAs).¹⁹
6. Embedding privacy and safety by design and default.²⁰
7. Prohibiting practices likely to contribute to known harms.²¹
8. Ensuring published terms, reporting mechanisms, and access to remedy are available, age-appropriate, and upheld.²²
9. Mandating responsible business conduct, including meaningful child participation.²³
10. Establishing oversight and effective enforcement mechanisms.²⁴

¹⁰ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 35; UN Committee on the Rights of the Child. (2013). *General comment No. 16*, paras. 8, 26, 28, 42, and 82.

¹¹ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 35-39.

¹² UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 38, 70, and 110; OECD. (2024). *Towards digital safety by design for children*; UNICEF & UN Human Rights. (2024). *Taking a Child Rights-Based Approach to Implementing the UNGPs in the Digital Environment*.

¹³ Wood, S. (2024). *Impact of regulation on children's digital lives*.

¹⁴ 5Rights Foundation. (forthcoming). *Building a Digital Environment Designed with Children in Mind: An international best practices blueprint*.

¹⁵ United Nations. (1989). *Convention on the Rights of the Child*, art. 1

¹⁶ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 4.

¹⁷ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 12 and 41.

¹⁸ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 114.

¹⁹ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 38.

²⁰ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 38, 70, and 110.

²¹ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, para. 96.

²² UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 39, 44, 49, and 70.

²³ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 35-39.

²⁴ UN Committee on the Rights of the Child. (2021). *General comment No. 25*, paras. 37, 82, and 114.

Signatories

Organizations

1. 5Rights Foundation
2. Aldeas Infantiles SOS España
3. Alza Tu Voz
4. Breaking the Silence, Bangladesh
5. Canadian Coalition for the Rights of Children
6. Child Helpline International
7. Child Rights Coalition Asia
8. Child Welfare League Foundation (Taiwan)
9. ChildFund Alliance
10. ChildFund Australia
11. ChildFund International
12. ChildFund México
13. Children and Young People Living for Peace
14. ChorogUsan for children
15. COFACE Families Europe
16. ColibrIA
17. Digital Child Rights Foundation
18. Digital Futures for Children centre
19. ECPAT Germany
20. ECPAT International
21. Eurochild
22. Fundación Datalat
23. Global Youth-Led Movement on Ending Violence Against Children
24. Group Development Pakistan
25. Instituto Alana
26. Kids Play Tech Lab at McGill University
27. Kids PlaySafer
28. Kindernothilfe
29. LAB-XXI
30. Media Monitoring Africa (Moxii Africa)
31. MediaSmarts / HabiloMédias
32. Missing Children Europe
33. Mtoto News
34. Network for Children's Rights
35. PKPA (Center for Child Study and Protection)
36. Plan International
37. Protección Digital Argentina
38. Red PaPaz - Viguías
39. Save the Children
40. SEJIWA Foundation
41. SOS Children's Villages International
42. Stiftung Digitale Chancen
43. Terre des Hommes Netherlands
44. Voice of Children Nepal
45. World Vision International
46. Youth in the Loop

Individual experts

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54. **Mikiko Otani**, *President of Child Rights Connect, former Chair of the UN Committee on the Rights of the Child*
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