...mission to the Global Digital Compact...

LEGO Group considers the GDC an   the challenges and leverage the ...

Despite the increasing presence of technology in their formative years,

At The LEGO Group, we know there are both commercial and ethical imperatives to
___ing responsible digital experiences for children and firmly believe that fun
_____ (and doesn't have to) come at a cost to child safety. Our [LEGO® Life](#) app, a
social-themed platform that inspires children to build and share their creations, embeds
safety in all aspects of product design whilst still _____. To
mitigate risk on the platform, content is pre-moderated before it goes live and users are
guided through the _____ age-appropriate language, with safety avatars advising
children _____

The _____ already embedded in international frameworks.
General Comment 25 commits s _____
children _____ to the highest standards of ethics, privacy and safety in the design, ____
development, and implementation of online products. The [OECD Recommendation on
Children in the Digital Environment](#) also recognises the acute risks children can face
online, and recommends that states adopt legal frameworks that mitigate harms
suffered by children. While we _____ to address these risks through [age-
appropriate ___ frameworks ___](#) and balanced online safety laws, we also urge states to
_____

As the instrument _____ an _____ **we**
**believe the __ _____ the well-established principle of digital safety for
children and encourage both states and digital service providers to proactively
protect children online.**

...for children's rights online... whilst enabling... the digital world.

The CRC should emphasize the shared commitment of... respect the rights... including freedom of association, privacy, participation and play. Respect for children's rights in online environments is a fundamental... interests of children in mind.

Digital worlds must balance protection of harm with promoting the well-being

In an age where many children have ubiquitous access to the tremendous opportunities the internet can...[1] it is not enough to ensure that services are safe, enabling and empowering - governments and providers should also design online experiences that promote a child's well-being.

The concept of well-being has long been synonymous with the overall health... person, with the World Health Organisation defining health as not just of the absence of disease but also a 'state of complete, physical, mental and social well-being'.[2] ...well-being has... widely been accepted as a key component of... 'best interest of the child' and is increasingly recognised as an important factor in creating... online environments for kids.[3] These conclusions are finding growing support within international fora like the UN, OECD, Council of Europe which highlight how digital technologies can improve child health and well-being, including by contributing to the social development of children and helping marginalised kids... their communities and connect with peers.[4] We believe the now established expectation to prioritise child well-being online obliges states and firms to imbed the concept into child-facing digital services, implement inclusive policies, and...

To help industry on this mission,... joined forces with UNICEF in 2020 to form the ...Responsible... (RITEC) project. This data driven initiative worked with children aged 7 over time to develop new understanding... -being. It is now working... businesses and policymakers... ideas... to build digital worlds that not only mitigate harm but also empower children, nurture creativity... diversity and inclusion... regulation, foster social connection and help them self-actualize. The emerging findings of this... – that digital... which place children at centre of their design can positively influence well-being – are supported by a growing body of work that emphasises the importance of responsible free play in digital worlds (see the "Playful by...

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[1] See ..., UNICEF
[2] See World Health Organisation Definition.
[3] General Comment 14 of the UNCRC as well as the United Nations High Commissioner for Refugees have closely associated the core concept of 'best interests of the child' with a child's overall well-being, stating 'the term "best interests"... broadly describes the well-being of a child.....determined by a variety of individual circumstances such as....the child's environment and experiences'
[4] improve their health and well-being' a... play which is essential for their well-being and development'. See also OECD Companion Document to the OECD... and the ...

[Design](#) and ~~Child Rights by Design~~ publications by UK's Digital Futures Commission, for example).

As UNICEF has noted, 'digital play experiences help children de-stress, problem solve, build confidence, resilience, and a sense of belonging, **provided that we properly balance its opportunities against risk of harm'.** Achieving this balance is critical. In other government frameworks that require ~~sidelining potential digital services to do~~ risks to children (as important as it is to mitigate) may create an entirely new category of harm – sterile digital experiences that do not enhance child well-being but instead stunt their development and growth.

The LEGO Group strongly recommends that the GDC, as a blueprint for an inclusive and enabling digital future, explicitly recognises the importance of prioritising the growth and development of children in online environments and highlights the need for governments and industry to protect the well-being of children through the governance and design of digital experiences online.

The GDC presents a singular opportunity to ensure children are not forgotten in our digital futures. We believe that reflecting the needs of digital safety, child rights online, and the imperative of promoting child well-being in this blueprint is an investment in children and families across the world. Thank you for the opportunity to comment and share our experiences.