



The LEGO Group

Submission to the Global Digital Compact

Thank you for the opportunity to submit to the UN Global Digital Compact (GDC). The LEGO Group considers the GDC an important initiative to address the challenges and leverage the opportunities presented by the digital era.

Despite the increasing presence of technology in their formative years, children's needs and voices have been historically absent in the online world. While we support wider initiatives to improve connectivity, avoid fragmentation and create a more open and accountable internet, **our submission is focused on the need for the GDC to encourage the design of digital services that not only protect children but also respect their rights and promote their well-being.** We believe it should be the shared ambition of the global community that *all* children have the opportunity to participate in safe digital experiences that help them grow, build 21st century skills and achieve their potential.

The LEGO Group

At The LEGO Group, children are our role models. The rights, safety, and wellbeing of the millions of children we engage with every day are of paramount importance. We recognize that the protection of children is a fundamental right as set out in the [UN Convention on the Rights of the Children](#) (UNCRC) and are committed to imbedding the values set out in that instrument, being the first toy company to sign up to the [10 Children's Rights and Business Principles](#) as well as the first firm to launch and implement a Child Safeguarding Policy.

With children more online than ever, each new generation has the capacity to be digital natives. Digital play is now increasingly important for friendship building, learning about the world, and the development of 21st century skills like creativity, problem solving and critical thinking. However, to help children reach their potential, we must give them the opportunity to grow in safe virtual playgrounds. This is why in 2016 we introduced an industry-first Digital Child Safety Policy and created the [Child Online Safety Assessment](#) tool alongside UNICEF to help other companies raise the bar in online safety. Recently, we have adopted the LEGO® Digital Child Rights & Well-being Principles, a series of commitments on online safety, empowerment, privacy and well-being based on the UNCRC. Our approach to child safety goes beyond protecting children online however, we firmly **believe connected technologies can empower kids to become responsible digital citizens and equip them with the skills needed to thrive in the digital era.**

Digital experiences for children should be designed with safety front of mind

As a vulnerable group in society, technology can pose particular risks for children. Unfortunately, [harmful content, conduct and exploitative practices](#) too often typify the experiences of many children online. Given that the risks of the digital world can disproportionately affect children (as both susceptible populations and 'early adopters' of new technology), they require enhanced and proportionate protections to ensure that technology works in their best interests.

At The LEGO Group, we know there are both commercial and ethical imperatives to designing responsible digital experiences for children and firmly believe that fun shouldn't (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 allowing for creative expression. To mitigate risk on the platform, content is pre-moderated before it goes live and users are guided through the app via age-appropriate language, with safety avatars advising children on how to have a positive and respectful online experience.

The need for safe online environments is already embedded in international frameworks. General Comment 25 commits states parties to ensure that digital experiences for children adhere 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 commend efforts to address these risks through [age-appropriate design frameworks](#) and balanced online safety laws, we also urge states to harmonise regimes and reduce regulatory fragmentation.

As the instrument outlining ambitions for an open, free and secure digital future, **we believe the GDC should reflect the well-established principle of digital safety for children and encourage both states and digital service providers to proactively protect children online.**

Online services must respect the rights of children

The UNCRC recognises the right of children to privacy, freedom of association, expression and, importantly, play. These (and other rights) translate directly into the digital world.

In the internet era, childhood moves fluidly between the digital and physical, with the social lives, entertainment and educational needs of children increasingly found online. As such, the need for online safety must not disproportionately restrict a child's recognised right to access information and participate in positive digital spaces where they can grow, develop and express themselves. This position is supported by international instruments like [General Comment 25](#) which calls for states parties to support a child's right to online participation, association and play, noting the constructive role that online playgrounds can have for the social development of children.

We believe governments and service providers can do more to fulfil this obligation and support children to realise their rights online. That is why The LEGO Group has created [fun, interactive resources](#) (like LEGO® 'Doom the Gloom' and our 'Build & Talk' experiences) to help families stay digital smart and engage in positive digital play. We are also undertaking research in Australia, South Korea and India to understand how industry and public authorities can help children be model digital citizens that participate fully and responsibly in digital life. This work has often revealed how much remains to be done to widen understanding of concepts such as digital footprints, privacy and respectful conduct and the need for institutions to prioritise the responsible

exercise of children's rights online whilst enabling appropriate access to the digital world.

The GDC should emphasize the shared commitment of the international community to respect the rights of children online, including freedom of association, privacy, participation, and play. Respect for children's rights in online environments is a fundamental pillar for a digital future designed with the best interests of children in mind.

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

In an age where many children have ubiquitous access to the tremendous opportunities the internet can offer (according to UNICEF 1 in 3 internet users are children),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 of a 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 also widely been accepted as a key component of experiences that are in 'best interest of the child' and is increasingly recognised as an important factor in creating positive 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 explore 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 and implement inclusive policies.

To help industry on this mission, The LEGO Group joined forces with UNICEF in 2022 to form the [Responsible Innovation in Technology for Children](#) (RITEC) project. This data driven initiative worked with children across 13 countries to develop an understanding of well-being. It is now working to equip businesses and policymakers with the tools to build digital worlds that not only mitigate harm but also empower children, nurture creativity, build competence, promote diversity and inclusion, develop emotional regulation, foster social connection and help them self-actualize. The emerging findings of this project – that digital services 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](#)

¹ See ['Growing Up in a Connected World'](#), 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 General Comment No 25 on the UNCRC highlights how digital technologies offer multiple opportunities for children to improve their health and well-being' and that 'the digital environment promotes children's rights to culture, leisure and play, which is essential for their well-being and development'; See also OECD Companion Document to the [OECD Recommendation on Children in the Digital Environment](#) and the [Council of Europe 'Handbook for policymakers on the rights of the child in the digital environment'](#).

[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. Internet governance frameworks that require digital services to consider only potential 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 promote 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 future. 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.