Lebanese Republic
National Human Rights Commission
including the Committee for the Prevention of Torture (NHRC-CPT)
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Children's rights and safety in the digital environment

Written statement for the OHCHR regional consultation for the Middle East and North Africa
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On behalf of Lebanon's National Human Rights Commission, including the Committee for the Prevention of Torture

The National Human Rights Commission of Lebanon, including the Committee for the Prevention of Torture, welcomes this regional consultation under Human Rights Council resolution 56/6. We recommend a funded, enforceable framework that protects children from digital harm while safeguarding their rights to information, education, privacy, expression and participation.[1]

Risks and the role of product design

The Commission's May 2026 study identifies interconnected concerns: cyberbullying, harassment, grooming, sexual exploitation, intrusive data practices and emerging harms involving artificial intelligence. Recommendation algorithms, commercial profiling and features designed to prolong engagement can increase exposure to harm. Regulation should address platform design and commercial incentives, not just individual incidents. We recommend protective default settings, restrictions on exploitative processing of children's data, transparency about recommendation systems and scrutiny of AI-related risks throughout the development and operation of digital services.[2]

Legislative and regulatory responses

Our advisory opinion of 25 August 2026 identified substantial shortcomings in two proposals restricting minors' social media use. A broad prohibition can encompass services with very different functions and risks. Regulation should distinguish between features such as public accounts, unsolicited contact, geolocation and algorithmic recommendations. Age assurance requires explicit

[1] National Human Rights Commission of Lebanon, "National Human Rights Commission announces submission on children's rights and safety in the digital environment", 7 October 2026. https://nhrclb.org/en/archives/8895

[2] Bassam Alkantar, Protecting Children in the Digital Environment: Social Media Restrictions, Platform Accountability, and Human Rights Implications for Lebanon, National Human Rights Commission of Lebanon, 12 May 2026. https://nhrclb.org/en/archives/6956

safeguards: data minimisation, limits on retention and reuse, independent assessment, accessible alternatives and human review of adverse automated decisions. Children's access to confidential assistance and essential information must remain protected.[3]

Our advisory opinion of 15 November 2026 assessed a further proposal to strengthen minors' protection in the digital environment. We welcomed its attention to service-provider responsibilities and safeguards, including children's ability to report without parental authorisation and the rejection of general monitoring of communications. We recommended substantive amendments concerning criminal-law coverage, definitions, protection against inappropriate prosecution, institutional responsibilities and effective oversight before adoption. This assessment concerns a legislative proposal; it does not demonstrate implementation or effectiveness.[4]

Evidence and implementation gaps

Our October contribution is a legal and policy assessment. It does not present a nationally representative survey, direct consultation findings from children, or an independent evaluation showing that particular interventions have reduced harm. We recommend establishing baselines and measuring outcomes, including access to assistance, response times, recurring harm, privacy breaches, and unjustified exclusion. Content-removal totals alone cannot establish effectiveness. Implementation requires sustained resources for schools, psychosocial support, accessible complaints procedures and investigators trained in child-sensitive interviewing and digital evidence. Regional cooperation should support lawful evidence preservation, urgent referrals and remedies across borders, with adequate language support, privacy safeguards and due process.[5]

Protecting children's other rights

Protective measures must be assessed against the full framework of children's rights, including non-discrimination, best interests and evolving capacities. A protective purpose does not remove the need to examine effects. Restrictions should meet applicable requirements of legality, necessity and proportionality. Policymakers should assess whether measures disproportionately exclude children because of disability, language, economic circumstances or migration

[3] National Human Rights Commission of Lebanon, "The Commission's Opinion on the Two Draft Laws Concerning the Protection of Minors from the Use of Social Media Networks", 25 August 2026. https://nhrclb.org/en/archives/8270

[4] National Human Rights Commission of Lebanon, "Opinion on the proposed law to strengthen the protection of minors in the digital environment" [Arabic], 15 November 2026. https://nhrclb.org/archives/9664

[5] National Human Rights Commission of Lebanon, "Children's rights and safety in the digital environment: Contribution to the consultations conducted by OHCHR pursuant to Human Rights Council resolution 56/6" [Arabic], 7 October 2026. https://nhrclb.org/archives/8883

status. Children should participate safely in this assessment and receive understandable explanations of decisions affecting them.[6]

We encourage OHCHR to support common standards for corporate accountability, independent evaluation and accessible remedies, accompanied by sustained technical assistance. National human rights institutions can contribute through legislative scrutiny, monitoring and complaints work within their mandates. Progress should be judged by children's actual experience of safety, access and redress.[7]

[6] National Human Rights Commission of Lebanon, "Children's rights and safety in the digital environment: Contribution to the consultations conducted by OHCHR pursuant to Human Rights Council resolution 56/6" [Arabic], 7 October 2026. https://nhrclb.org/archives/8883

[7] National Human Rights Commission of Lebanon, "National Human Rights Commission announces submission on children's rights and safety in the digital environment", 7 October 2026. https://nhrclb.org/en/archives/8895