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**TO: HUMAN RIGHTS COUNCIL**

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**SUBMISSION BY MEDIA MONITORING AFRICA:**

**HUMAN RIGHTS COUNCIL RESOLUTION 51/10 ON CYBERBULLYING AGAINST PERSONS WITH  
DISABILITIES**

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## INTRODUCTION

1. Media Monitoring Africa (“**MMA**”) welcomes the opportunity to provide this submission to the Human Rights Council (“**HRC**”) on important questions about cyberbullying against persons with disabilities.
2. MMA, established in 1993, is a not-for-profit organisation, based in South Africa, that has evolved from a pure monitoring-based project to an innovative organisation which implements successful media strategies for change.<sup>1</sup> Since 2003 children’s rights have played a central role in MMA’s work, ranging from pioneering efforts in meaningful children’s participation to empowering children through media literacy workshops, providing editorial guidelines and principles for the reporting of children in the media, and making parliamentary submissions with and on behalf of children.<sup>2</sup> As well as producing comics<sup>3</sup> addressing disinformation.
3. Most notably, we work directly with young digital citizens, **Web Rangers**, who are empowered to use the internet responsibly.<sup>4</sup> The Web Rangers programme encourages the development of digital literacy skills that allow young people to gain critical skills and knowledge about online safety. In addition, the programme also equips young people with the skills to critically engage with content and learn how to spot disinformation.
4. MMA has also a keen interest in advancing the ideals of equality and inclusion, particularly in the context of freedom of expression and access to information. MMA advocates that services and information must be accessible to all persons, regardless of education, disability, age, gender, and other similar factors. In this regard, MMA prepared submissions on the Draft Code for Persons with Disabilities Regulations published by ICASA.<sup>5</sup> MMA recognised how the barriers to accessing information and communications technologies (“**ICTs**”) can hinder the ability of persons with disabilities to use these services in a way that is meaningful, relevant, and useful to them in their daily lives. MMA submitted that all broadcasting and electronic communications services must be available in accessible and usable formats for persons with disabilities. MMA has also engaged in litigation on questions appropriately realising the right

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<sup>1</sup> For more information about MMA, please visit: [mediamonitoringafrica.org](https://mediamonitoringafrica.org).

<sup>2</sup> In addition to these activities MMA engages in strategic litigation on a range of media freedom and children’s rights-related issues. MMA also runs a unique postgraduate University accredited course on reporting on children. Further, MMA has developed a discussion document on children’s rights online, which has informed a workshop with its Web Ranger participants, who in turn have contributed to the drafting of a Digital Rights Charter that seeks to give effect to an internet that is accessible, safe and empowering, and that advances the development of children in line with their rights and interests, see MMA, ‘Children’s Rights Online: Towards a Digital Rights Charter’ (2020) (accessible [here](#)). Most recently, MMA released another discussion document, focusing on disinformation through a children’s rights lens, see MMA, ‘Disinformation through a children’s rights lens’, (2022) (accessible [here](#)).

<sup>3</sup> See: <https://mediamonitoringafrica.org/wordpress22/wp-content/uploads/2021/11/Disinformation-Comic-Book.pdf> which deals with vitiligo and disinformation. See: <https://webrangers.co.za/?p=980> which deals with homophobia and disinformation.

<sup>4</sup> The Web Rangers programme is run together with major partners including Google, Facebook, the Department of Communications and Digital Technologies, the Media Development and Diversity Agency and Disney. For more information, please see [webrangers.co.za](https://webrangers.co.za).

<sup>5</sup> MMA, ‘Submission on the Draft Code for Persons with Disabilities Regulations published by the Independent Communication Authority of South Africa (ICASA)’ (2020).

to freedom of expression and the ability to share knowledge and ideas in the digital era for persons with visual impairments in the context of copyright laws.<sup>6</sup>

5. Accordingly, and in line with our areas of interest and work with the Web Rangers, MMA's submissions are narrowly tailored to focus on children's rights, the intersection of **cyberbullying and disinformation** and the role of **digital literacy** in empowering children to combat cyberbullying and foster inclusivity.

### Cyberbullying and disinformation

6. Children are active users of social media, with online platforms frequently being the primary information sources for young people. As active digital users, children are often exposed to mis/disinformation. Despite this, children do not always have the cognitive and emotional capacity to distinguish between reliable and unreliable information.<sup>7</sup>
7. UNICEF has found that children can have various relationships with disinformation – they “can be targets and objects of mis/disinformation, spreaders or creators of it, and opponents of mis/disinformation in actively seeking to counter falsehoods.”<sup>8</sup> While we do not know the full extent or specific impact of disinformation on children we do know that children can be susceptible to disinformation, and they may not always have the necessary maturity or digital literacy skills to navigate the complex online landscape.<sup>9</sup> Hindering access to accurate information, impacting freedom of expression, and sowing division and hatred are all consequences of disinformation that children may experience.
8. Disinformation poses a significant threat to the right to freedom from discrimination. It often disproportionately targets marginalised groups, with the intent to fuel violence, threaten harm, and amplify discrimination.<sup>10</sup>
9. In the context of cyberbullying that targets persons with disabilities, views based on inaccurate information can induce people to engage in discriminatory, hateful, and harmful behaviours. Disinformation is a pervasive threat and feeds into harmful and exclusionary narratives and fuels cyberbullying.
10. Mis/disinformation among parents, caregivers and educators has a negative effect on children, even if the child themselves is not directly exposed to it. What these other members of society are exposed to trickles down to what information children are exposed to, which could result in distorted or manipulated views of people with disabilities.

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<sup>6</sup> *Blind SA v Minister of Trade, Industry and Competition and Others* [2021] ZAGPPHC 871.

<sup>7</sup> Philip Howard, Lisa-Maria Neudert, Nayana Prakash & Steven Vosloo “Digital misinformation/disinformation and children” *UNICEF* (August 2021) (accessible [here](#)) at 13.

<sup>8</sup> UNICEF, ‘Digital misinformation/disinformation and children’ (2021) (accessible [here](#)).

<sup>9</sup> *Id.*

<sup>10</sup> MMA, ‘Disinformation through a children’s rights lens’, (2022) (accessible [here](#)).

11. Algorithms determine personalised news feeds, search results, content and recommendations based on individual profiles that have been generated by tracking user behaviour.<sup>11</sup> Through the promotion of misleading, harmful, exclusionary, and discriminatory content rather than factual information, algorithms and other emergent technology, like artificial intelligence technologies, are key to the flow of mis/disinformation. This has been demonstrated on multiple occasions throughout recent years, the spread of COVID-19 mis/disinformation being an illustrative example.<sup>12</sup>
12. **In order to effectively combat cyberbullying of persons with disabilities responses need to infuse considerations around the intersection and impact of disinformation on this type of online harm.**

### Digital literacy

13. As children are still developing their critical thinking skills,<sup>13</sup> it is especially important to equip children with the necessary skills to navigate complex and often harmful information ecosystems and know how to respond. According to UNESCO, digital literacy comprises “a set of competencies that help people to maximise advantages and minimize harms” and “covers competencies that enable people to critically and effectively engage with communications content; the institutions that facilitate this content; and the use of digital technologies”.<sup>14</sup>
14. In an increasingly online world, digital literacy is key to communicating, engaging, and accessing information. Children must have digital literacy skills in order for them to know how to use and engage with online content, which includes knowing how to be safe, sensible and respectful of others while online.<sup>15</sup> However, there are many children across the world who do not have these skills and are not taught these skills. This results in skills gaps, digital divides, and increasing risks of cyberbullying and online harms.
15. Critical digital literacy skills facilitate meaningful and active participation for children. Being digitally literate allows a child to develop an appreciation of the many opportunities of the online world. These skills enable all children to access and operate in digital environments safely, responsibly, and effectively. It enables them to know how to spot disinformation, and how to report online harms.
16. MMA, together with the Impact Amplifier and Web Rangers have developed an informative

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<sup>11</sup> Id.

<sup>12</sup> Christina Pazzanese “Battling the ‘pandemic of misinformation’” *The Harvard Gazette* (8 May 2020) (accessible [here](#)).

<sup>13</sup> Ozgul Polat & Ebru Aydin “The effect of mind mapping on young children’s critical thinking skills” (2020) 38 *Thinking Skills and Creativity* 1 (accessible [here](#)) at 2.

<sup>14</sup> UNESCO, ‘Media and information literate citizens: Think critically, click wisely!’, (2021) (accessible [here](#)).

<sup>15</sup> MMA submits that digital literacy includes critical skills development such as finding, evaluating, and managing information online, identifying content that may amount to climate mis- or disinformation, navigating and exploring new spaces, cognisant of risks and harms, interacting, sharing, and collaborating online, and developing and creating content. See UNICEF, ‘Children in a digital world’ and Web rangers (accessible [here](#)).

comic book to assist young people to navigate mis and disinformation.<sup>16</sup> The comic book focuses on misinformation because experience has shown that young people fall victim to both mis and disinformation. The story engages with questions about cyberbullying, targeting a young girl with vitiligo. Through the story, it becomes clear that innocent conversations between two people about an unknown issue have the potential to cause great harm.

17. MMA submits that programs like the Web Rangers are a key useful, implementable, and innovative response to advance digital literacy which in turn enables children to evaluate information, spot disinformation, and address interconnected online harms.
18. As of 2022, Media Monitoring Africa's Web Rangers programme has trained over 1500 young people across South Africa in critical thinking alongside digital and media literacy skills. In addition to online safety, the programme also equips young people with the skills to critically engage with content, learn how to spot disinformation and develop methods on how to use the internet safely. Through the program, young digital citizens are empowered to use the internet responsibly and encourage their peers to do the same, and encourages the development of digital literacy skills that "allow young people to gain critical skills and knowledge around online safety that they use to create innovative campaigns that promote safe internet usage and champion their rights in the digital world."<sup>17</sup> These young learners unpack emerging challenges facing young people as well as the exciting opportunities in an increasingly digital world and navigate how best they advance their rights, in line with their evolving capacities and their agency.
19. In 2020, the Web Rangers, supported by MMA developed a **Digital Rights Charter** which seeks to reflect key elements of an achievable digital world for children in which accessibility, safety, and empowerment are core features.<sup>18</sup> A notable component of the Digital Rights Charter related to meaningful access. In which the Web Rangers focused on the following:
  - 19.1. All children should have access to inclusive and appropriate ICT devices that are accessible to children regardless of their differing abilities;
  - 19.2. All children must be afforded meaningful access on an equal and equitable basis, and such access must promote equality and inclusion;
  - 19.3. Children with disabilities must have access to user-friendly and accessible ICT devices; and
  - 19.4. All children must be afforded the opportunity, through their schooling, to participate in digital literacy and skills development programs that equip them with the necessary technical, social, and critical skills to enable them to safely navigate online

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<sup>16</sup> S Mandla et al, 'Luthando's Misadventure with Mis- & Disinformation' (2021) (accessible [here](#)).

<sup>17</sup> For more information, please see [webrangers.co.za](http://webrangers.co.za).

<sup>18</sup> MMA, 'Children's Rights Online: Towards a Digital Rights Charter' (2020) (accessible [here](#)).

spaces.

20. The children, on their own accord, recognised the importance of equitable access and that this must be infused with adequate digital literacy to ensure that they can engage safely online. This illustrates the value of digital literacy as a response initiative to advance access and minimise online harms.
21. **We, therefore, suggest that, as part of the context of meaningful access and online safety for persons with disabilities, that the HRC recognise the significance of enhancing the ability of a child to have appropriate digital literacy skills to address cyberbullying against persons with disabilities and encourage states to work with partners to develop and implement comprehensive digital literacy programs in schools.**

### Reporting disinformation and online harms

22. Advocacy efforts play a role in the fight against disinformation and cyberbullying. An innovative example of this is a disability-accessible platform for the public to report digital harms including disinformation. MMA's Real411 platform is a world-first initiative, bringing together various stakeholders across the media and civil society sectors.<sup>19</sup> Complaints of disinformation and online harms are submitted by members of the public via the online portal, reviewed by experts, and the outcome of the complaint, with an explanation, is published on the Real411 website. The complaints process also includes an appeal process of which former Constitutional Court Justice Yacoob is the appeal judge.<sup>20</sup>
23. To date, we have received thousands of complaints. We submit that these accessible and user-friendly platforms can play an important and meaningful role in the fight against cyberbullying and the spread of harmful disinformation about persons with disabilities. Not only does the system have the benefit of ensuring that action against content can be taken, but the content is assessed according to the same criteria regardless of the platform. In addition, Real411 also helps empower the public to take action.
24. **We, therefore, suggest that platforms such as Real 411 are valuable initiatives that seek to credibly investigate complaints of disinformation and cyberbullying against persons with disabilities and that such mechanisms – are encouraged and supported by platforms and possibly linked to psycho-social support services for victims who wish to report and get support.**

### CONCLUDING REMARKS

25. MMA submits that responses to the cyberbullying of persons with disabilities should include:

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<sup>19</sup> Media Monitoring Africa, 'Real 411: Report Digital Disinformation,' (accessible [here](#))

<sup>20</sup> Justice Yacoob is the first blind Justice of the Constitutional Court of South Africa.

- 25.1. A recognition of the **harm and intersection of cyberbullying and disinformation.**
  - 25.2. Ensuring **that digital literacy is prioritised and made available to all.** It should be built into school curricula, covering a range of issues, and enabling active, informed participation in a digital environment through an equality and inclusion lens.
  - 25.3. Advancement and recognition of advocacy efforts, such as Real 411, as a means to **credibly investigate complaints of disinformation and cyberbullying against** persons with disabilities and have them dealt with efficiently.
  - 25.4. Lastly, **civil society should continue to enable digital activism** and partner with big tech companies and the government to provide research support and assist in identifying responses to cyberbullying and disinformation, to help build and promote a multi-stakeholder approach to digital evils.
26. MMA welcomes and encourages the collaborative and inclusive approach of the HRC in engaging with the questions around cyberbullying and its impact on persons with disabilities. We appreciate the opportunity to provide this submission and remain available to assist the Committee, including by providing further written or oral submissions at the appropriate time.
27. Please do not hesitate to contact us should you require any further information.

**Media Monitoring Africa  
Johannesburg, 2024**