The International Federation of Library Associations and Institutions would like to thank the Special Rapporteur for the opportunity to offer inputs to this call for submissions on privacy rights of children, their independence and autonomy. IFLA welcomes the Rapporteur's initiative to examine and prepare a report on this topic.

As a federation of associations and institutions, IFLA works with libraries worldwide to develop standards, share best practices, raise awareness and inspire action to continue upholding the library field's professional commitment to Intellectual Freedom and user privacy. Drawing on the library field's experiences, we would like to suggest several observations and insights on children's privacy and identity, whether online or offline, in social, educational and recreational spheres; as well as relevant initiatives and good practices in the library field.

Hundreds of thousands of public, school, academic, college and special libraries around the world routinely serve children and young adult users. Privacy is one of the key values of the library sector – as codified, for example, in the IFLA Code of Ethics for Librarians and other Information Workers. This means that privacy and confidentiality of their young users are a crucial consideration for libraries and librarians – from loan history data to physical spaces, public internet access and beyond.

A statement from the IFLA School Libraries section, for example, highlights the various roles of school libraries, one of which is providing a "safe space where individual curiosity, creativity and an orientation toward learning are encouraged and supported and where students can explore diverse topics, even controversial topics, in privacy and safety" (while maintaining legal compliance, naturally).

Children's Privacy and Intellectual Freedom

Libraries' professional commitment to privacy falls within the broader field of intellectual freedom – because privacy is integral to people's ability to exercise their rights to freedom of access to information and freedom of expression. As such, the position that "library users shall have the right to personal privacy and anonymity" is part of the IFLA Statement on Libraries and Intellectual Freedom, and the IFLA statement on Privacy in the Library Environment further notes that this has to do with the ability to access information without a fear of negative consequences.

These rights and ethical norms, naturally, also hold for children's and young adults' privacy as well – both the IFLA Guidelines for Library Services to Children aged 0-18 and the School Library Guidelines include references to the importance of upholding the principles of privacy and access to information/the right to know of young users.

The potential Intellectual Freedom consequences of a loss of privacy on children and young adults are important. For example, a 2017 survey suggests that not only were people less likely to write or speak about some things online when made aware of online surveillance – women and younger respondents were increasingly more likely to experience this "chilling effect".

Alongside the practical evidence, looking at privacy from different theoretical angles can also offer insights on the relationship between privacy and Intellectual Freedom. For example, [Rubler (2014)](#) argues for conceptualising privacy in libraries in light of the Intellectual Freedom commitment not simply as a negative freedom (absence of external constraints on actions, i.e. possible harm or obstacles to intellectual activities arising due to privacy loss), but rather links it to quality of agency - the ability to act autonomously, to have the opportunity to make informed decisions according to ones' values, and form preferences autonomously. For children and young people, this links to value formation, wherein a degree of privacy – in this case in reading habits – affords more autonomy.

Children's privacy and the possible consequences of its loss can be understood within the framework of their Intellectual Freedom rights. As such, children's privacy helps deliver on their rights to access information and their right to freedom of expression.

Children's Privacy and Media and Information Literacy

As information professionals, many libraries are actively raising awareness and promoting skills-building for media and information literacy – the competencies for critically assessing, finding and using information in today's complex information environment. This has an intrinsic link to privacy – including the privacy of children and young adults.

A [2017 report by UNESCO](#), for example, explains that when privacy is understood as implying the protection (or even sometimes restriction of access to) personal information, its relation to broader media and information literacy skills becomes apparent. Information and media competencies empower people to understand the importance of their privacy rights, become aware of commodification of personal information online, understand privacy dangers and benefits in digital environments and make informed choices, ethically use personal information, and more.

A [2018 LSE report](#) also examines how children's privacy relates to their information and media literacy skills. Understanding how information and data is shared, created, used – particularly online – is fundamentally linked to children's privacy skills and understanding. This includes, for example, the links between children's comprehension of their online digital traces, data lifecycles, and digital advertising – and their privacy skills.

Children's broader competencies to find, evaluate, and use information – particularly in today's complex informational ecosystems – can be seen as fundamentally linked to their privacy skills and comprehension. As such, it could be useful to further examine the potential of media and information literacy-focused interventions, both in schools and in community institutions such as libraries, staffed with information professionals, as a tool to support children's rights to privacy.

Good Practices: Interventions That Help Deliver on Children's Privacy Rights

The UNESCO report mentioned earlier also included survey results indicating that not only do youth respondents care about their privacy (with 74% respondents indicating that privacy is important to them) - most (90% of respondents) value self-empowerment, i.e. through acquiring media, information and digital competencies, as a way of ensuring their safety online.

This suggests that that learning opportunities can be an important way to help deliver on children's rights to privacy. Libraries traditionally take an active role in safeguarding users' privacy – including that of younger users – and offering learning opportunities for privacy 'self-defence' online.

[A 2020 study of privacy literacy instruction practices in academic libraries](#) by Hartman-Caverly and Chisholm, for example, describes survey results that offer some insights on the variety of library-based privacy literacy initiatives aimed towards students. These range from single sessions to one-on-one consultations, from standalone workshops to displays or passive programming, to preparing resource guides, and more. Importantly, 42% of library respondents cite student interest as their reason for offering privacy literacy instructions, indicating the demand/interest for such programming.

Public and school libraries also offer a variety of programs and interventions for younger students and children – especially as part of broader digital skills and digital literacy programming. In the 2018 "[Children's Online Privacy and Freedom Of Expression](#)" toolkit, UNICEF points out that digital literacy skills can help children make informed choices about their personal content – what to create and what to share.

As trusted and open institutions, libraries can be well-positioned to deliver such trainings. For example, many libraries around Europe [actively engage with Safer Internet Day](#) – an annual international initiative focused on raising awareness and ensuring that children have the skills to participate in the digital society safely and responsibly. Libraries in [Lithuania and the Czech Republic](#), for instance, offer programs, competitions, workshops and other programs that help build up children's digital literacy and skills to stay safe online.

One of the practical ways to deliver on children's right to privacy is building up their digital skills and literacy. Library-based interventions can help ensure equitable access to such learning opportunities for children.

Children's privacy and children's data

And finally, as institutions that come into contact with children and young adults' data in the course of their everyday work, libraries themselves have developed good practices that ensure the privacy of their users.

This includes, for example, ensuring privacy of use of public computers and public internet connections (such as restarting computers to their basic configuration and erasing previous user session's data after each use - see e.g. the [IFLA Guidelines on Public Access in Libraries](#)); minimising data collection about their users, or pushing third partners involved in service delivery to protest user privacy as well.

The American Library Association's [Library Privacy Guidelines for Students in K-12 Schools](#) and [Library Privacy Checklist for Students in K-12 Schools](#) also offer a series of suggested good practices, such as developing clear and easy to understand privacy policies as well as internal procedures to protest the privacy of students; conducting privacy audits, data encryption, and more.

Good practices and rigorous standards of protecting the privacy and security of children's data are crucial.