



Boys & Girls Clubs
of Canada



Protecting children's privacy online

Written submission to the House of Commons Standing Committee on Access to Information, Privacy and Ethics, on the study of the Personal Information Protection and Electronic Documents Act (PIPEDA), March 2017.

About Boys and Girls Clubs of Canada

Boys and Girls Clubs of Canada is a national charity serving 200,000 young people in more than 625 locations across Canada – approximately 120,000 of the children and youth that walk through our doors live in low-income situations. Boys and Girls Clubs offer programs that inspire, teach, challenge, and respond to local needs and the challenges of preparing young people for their future. This helps young people realize their best potential in a complex world.

Introduction

In a recent opinion editorial (Huffington Post, February 7, 2017), Boys and Girls Clubs of Canada President and CEO, Owen Charters, expressed concern that online marketers are actively collecting children's private information without meaningful consent. This is especially worrying given that children are accessing the internet at younger ages through personalized devices and 'things'. We understand that the ETHI committee has seen this op ed and we'd like to add a few thoughts and recommendations for your consideration.

Our concerns

From a developmental perspective, young children are not able to properly determine the risks associated with sharing private information online. And because children are online and sharing for years before they reach the age of majority, corporations are compiling an extensive profile of Canada's children. We don't think that's right.

Despite the Canadian Marketing Association's code of ethics and the Privacy Commissioner of Canada's guidelines for marketers, the collection of children's private information by corporations is not regulated, nor enforced. This needs to change.

Boys and Girls Clubs across the country make use of social media sites to connect with children, youth, and families. Our National Youth Council for instance, is made up of 10 youth from across the country with whom we engage using online tools such as Facebook. Boys and Girls Clubs have developed programs that introduce young people to coding and provide them with Internet access through tech centres located right in our Clubs. We're doing our part to help bridge the digital gap in low-income communities.

Clubs are facilitating children and youth's access to online environments and we are concerned that Canada has not done enough to ensure that those environments will respect young people's privacy rights.

Our recommendations

In its review of PIPEDA, we call on the government to explicitly include children's privacy rights into the Act. Specifically, we ask the government to:

- 1. Prohibit the collection, use, and disclosure of all personal information from children under the age of 13.**
- 2. Follow the lead of the European Union's General Data Protection Regulation and require parental/guardian consent for access to online services for children aged 16 and under (or a lower age, as long as it is not below 13).**
- 3. Afford children the right to be forgotten when they reach the age of majority – requiring that corporations be required to remove private information immediately, unless the newly adult person gives his or her explicit consent to the continued collection, use, and possible future disclosure of their personal information gathered during their minority.**
- 4. Give the Office of the Privacy commissioner the power to enforce new children's privacy regulations.**