REPUBLIC OF RWANDA

Ministry of ICT & Innovation

Rwanda Child Online Protection Policy

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1. INTRODUCTION

The Internet and associated digital technologies provide opportunities for social and economic transformations that benefit all sections of Rwanda's society, including children. However, the use of digital technologies comes with some known risks and harms for children. The Rwanda Child Online Protection Policy ("the COP Policy") is designed to mitigate against those risks and harms, and to deliver a framework that meets children's needs and fulfils their rights, while enabling them to safely and confidently navigate the digital environment.

Rwanda considers children's rights to be a pillar of public policy, as evidenced in its institutions, policies and laws.[1] Realising children's rights in a digital world involves a broad spectrum of stakeholders, each of whom must act in the best interests of the child.[2] All stakeholders, including government and public agencies; information and communications technology companies (including hardware and infrastructure companies); telecommunication companies; communities and civil society organisations; parents, teachers and children themselves must accept and exercise a shared responsibility in the implementation of this policy, in line with their respective roles and resources.[3] In framing the COP Policy, it has been important to consider the asymmetry of knowledge and access to expertise between those who create technology and those who use it. Comprehensive child online protection is dependent upon stakeholder's partnership, working nationally and internationally.

The COP Policy includes the establishment of a governance framework which will act as a central point for the direction and coordination of all policy areas. The Governance shall coordinate to extend existing domestic regulatory and legislative frameworks to harmonise legislation with global best practice; strengthen the understanding and capacity of law enforcement; furthermore the provision of education, information and training for all stakeholders, including parents and children; establish a high level of data protection, with specific provisions for children; create world-class reporting and takedown mechanisms; and promote positive uses of digital technologies by children. These efforts will build on Rwanda's

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[1] Under Article 1 of the UN Convention on the Rights of the Child, children are generally recognized as persons under the age of 18; in Rwandan law (N°54/2011 OF 14/12/2011), a child is any person under the age of eighteen (18) years old.
[2] Convention on the Rights of the Child, Article 3.
[3] In determining responsibilities, it is important to consider stakeholders' knowledge, resources and capacity, and in particular the imbalance in power between those who create technology and those who use it.

existing strides towards protecting children online and establish the country as a regional leader in COP research and innovation.[4]

The COP Policy reflects the fact that the digital environment is a significant tool for children's education, creativity, self-expression and economic empowerment, and that children's access to the digital environment is both necessary and desirable. It represents the Government of Rwanda's full commitment to the safety and wellbeing of children, the nation's greatest and most precious asset.

2. INTERNATIONAL AND REGIONAL CONTEXT

The digital environment is transnational; therefore, it is important to consider international agreements, standards and guidance relevant to COP. The United Nations Convention on the Rights of the Child (CRC) sets the gold standard for children's rights and applies online just as it does offline. The CRC enshrines children's rights for protection from violence and exploitation, privacy, participation, freedom of expression, and association, among others[5].

The World Summit on the Information Society's (WSIS) Outcomes Document[6] and Tunis Commitment[7] recognise both the role of ICTs in enhancing children's development and the need to protect children from abuse and uphold their rights in a digital world. Similarly, the UN Sustainable Development Goals (SDGs) provide a roadmap for international cooperation and development, and set targets related to education, industry, innovation and infrastructure that will shape children's access to and experiences in the digital environment. The SDGs also call for an end to all forms of abuse, exploitation and violence against children.[8]

As part of the Global Cybersecurity Agenda (GCA)[9] the International Telecommunication Union (ITU) has developed COP Guidelines for policy makers; parents, teachers and educators; children; and – with UNICEF – industry.[10] These Guidelines aim to establish the foundations

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[4] Among other things, Rwanda has a 24/7 Cyber-Security Incident Response Team, a Cyber Forensic and Investigation Laboratory Centre, and Hotlines through the Police and the National Children's Commission.

[5] Convention on the Rights of the Child (1989), http://www.unesco.org/education/pdf/CHILD_E.PDF

[6] World Summit on the Information Society, Outcome Documents (2005) http://www.itu.int/net/wsis/outcome/booklet.pdf

[7] World Summit on the Information Society, Tunis Commitment (2005) https://www.itu.int/net/wsis/docs2/pc3/working/dt12rev5.pdf

[8] For more information about the Sustainable Development Goals, visit: https://www.un.org/sustainabledevelopment/sustainable-development-goals/.

[9] ITU Global Cybersecurity Agenda, High-Level Experts Group, Report of The Chairman, https://www.itu.int/en/action/cybersecurity/Documents/gca-chairman-report.pdf

[10] For the full set of COP Guidelines, visit https://www.itu.int/en/cop/Pages/guidelines.aspx.

for a safe and secure digital environment for Children. The WeProtect Global Alliance, led by the UK Government, also produced a Model National Response to prevent and tackle online sexual exploitation and abuse.[11]

The African Charter on the Rights and Welfare of the Child (ACRWC)[12] and the African Youth Charter (AYC)[13] set out the rights and duties of children.[14] Much like the CRC, the ACRWC and AYC recognise children's protection and participation rights. The African Union's 2040 Agenda for Children aspires for all African children to be protected against violence, exploitation, neglect and abuse, to be given opportunities to share their views in society, and to have access to quality education that integrates digital technology.[15]

The COP policy seeks to build on and manifest all of these standards in the Rwandan context.

3. CHILD ONLINE PROTECTION IN RWANDA

Rwanda has a young population. Children, defined as persons under the age of eighteen[16], constitute nearly half the population[17]. Rwanda is actively seeking to improve access to the Internet and digital technology, to embrace the use of smart technology on a city scale, and to transition government, banking and commercial operations and other service delivery to digital platforms. At the time of policy development, 52.8% of the Rwandan population are online, this is over 25% increase over the previous years[18]. The COP Policy anticipates a time in which all children in Rwanda are online and embodies the need to ensure that they are empowered, protected and their rights promoted in the digital environment in all sectors.

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[11] WeProtect Global Alliance, Preventing and Tackling Child Sexual Exploitation and Abuse: A Model National Response (2015), available at https://www.weprotect.org/the-model-national-response/.

[12] African Charter on the Rights and Welfare of the Child (1990), http://www.achpr.org/files/instruments/child/achpr_instr_charterchild_eng.pdf

[13] African Youth Charter (2006), https://au.int/sites/default/files/treaties/7789-treaty-0033_-_african_youth_charter_e.pdf. The AYC applies to persons aged between 15 and 35.

[14] Rwanda ratified the ACRWC in 2001 and the AYC in 2007.

[15] Africa's Agenda for Children 2040, African Committee on the Rights and Welfare of the Child, https://au.int/sites/default/files/newsevents/agendas/africas_agenda_for_children-english.pdf. See also African Union Assembly adopts 2040 Agenda for Children, International Justice Resource Center (Aug. 14, 2017), https://au.int/sites/default/files/newsevents/agendas/africas_agenda_for_children-english.pdf.

[16] Law N°54/2011 OF 14/12/2011.

[17] According to the latest 2015 UN figures, 52% of the population is under 20 and 42% is under 15. The projection for 2020 is for 49.5% to be under 20. See https://population.un.org/wpp/DataQuery/
See also census data for 2012: http://rwanda.opendataforafrica.org/mlhmqxf/rwanda-census
http://rwanda.opendataforafrica.org/rwedwyc/age-structure-of-population

[18] Rwanda Utilities and Regulatory Authority (RURA), Annual Report 2017-2018
http://www.rura.rw/fileadmin/Documents/docs/report/RURA_ANNUAL_REPORT_2017-2018.pdf

Rwanda has already developed a favourable policy environment for digital technology, children's rights and cyber security, and has taken specific steps to meet some of the challenges However, both the complexity of the digital environment, its changing nature and defining a child's place within this environment require further action to be taken.

Existing initiatives include: Institutionalization like having a dedicated organ in charge of Children (National Children Commission), National children protection instruments like National Children protection policy, Integrated Child Rights Policy, Rwanda Early Child hood Development Policy, National Policy for Child Labour. Other initiatives related to Rwanda's own capabilities include the availability of National Cyber Security Incident Response Team, Digital Forensic Laboratory, Police Toll Free, Laws to facilitate prosecution for cybercrimes, including the advertising of child sexual abuse material (CSAM)[19], Campaigns and Awareness Programmes, Community Policing Programme, International Cooperation Initiatives (e.g., with Interpol and other law enforcement agencies; signatory to coordinated global action to forge partnerships with industry to tackle online sexual abuse). NCC,

4. POLICY RATIONALE

The Internet and digital technologies provide children with an unprecedented range of opportunities to play, learn, innovate and be creative; to communicate and express themselves; to collaborate and engage in society; and to develop 21st century digital skills.[20] Children should be encouraged to develop creative and digital skills, and be empowered to exercise their full range of rights online, in a safe and secure way.

The COP Policy sets out a comprehensive set of policy areas and measures designed to support children online, in an environment where all stakeholders play their part.

The digital environment rests on fast-changing technology that since its introduction, has become extremely powerful in dictating the behaviour of children and young people. Being online gives children access to information, facilitates human contact, and enhances

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[19] See, e.g., Official Gazette no. 14 of June 2012, Article 30.
[20] See OECD, The Future of Education and Skills: Education 2030, The Future We Want, available at
https://www.oecd.org/education/2030/E2030%20Position%20Paper%20(05.04.2018).pdf.

commercial exposure. It is for this reason that Rwanda seeks to establish its requirements of all stakeholders regarding the protection and privileges of child users.

4.1 RISKS AND HARMS

Evidence shows that children face many of the same online risks regardless of geographical location, but there are some specific concerns in countries where the expansion of digital access has happened rapidly and recently. Some harms may only emerge when digital technology has been widely adopted and extensively used. Therefore, it is necessary to consider evidence of harms from other contexts, the specific issues and relative importance of risks as they manifest in the Rwandan context, and to anticipate risks that may emerge in the future.

Risks do not inevitably result in harm, and it is vital to understand the factors that give rise to the probability of harm to children. Risks fall into four broad categories (content, contact, conduct, contract)[21]:

Content risks include: indecent images of children, adult pornography, violent, discriminatory or hateful content, fake news or false narratives, content that promotes risky or unhealthy behaviours.

Contact risks include: child trafficking, discriminatory abuse and hate speech, grooming and exploitation, harassment, radicalisation, blackmail, unwanted sexual advances, sharing the real time location of a child.

Conduct risks include: bullying, sexting, revenge porn, threats and intimidation, reputational damage, impersonation, social humiliation, compulsive use, cybercrime, gambling.

Contract (sometimes called commercial) risks include: data collection for targeted advertising, marketing schemes, fraud, scams, misuse and misappropriation of intellectual property, unfair terms and conditions, and weighted search rankings. This includes commercial drivers which create norms that children are developmentally not able to manage or absorb without harm (e.g., profiling vulnerable users, inaccurate or discriminatory socio-economic

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[21] http://www.safeguardingni.org/sites/default/files/sites/default/files/imce/E-safety%20report%20exec%20summary%20200114.pdf

profiling, automated/semi-automated decision-making and data set training, loss of control of digital legacy/footprint, surveillance by public and commercial institutions).

Harms

The experience of harm changes from child to child on the basis of factors including but not limited to gender, age, family circumstances, socio economic status, and experiences and availability digital technology. Child online protection strategies must be developed in advance to mitigate risks and address harms, and to always consider how products and services may negatively impact the end user, if that user is a child.

5. NATIONAL CHILD ONLINE PROTECTION POLICY

The following Rwanda values shall be embodied and followed as baselines while implementing this policy and conducting any counter COP initiatives:

5.1 VISION

All Rwandan children are empowered to access the digital environment creatively, knowledgeably and safely.

5.2 STRATEGIC OBJECTIVES

- Establish a governance framework to drive and guide COP delivery and enforcement;
- Educate all stakeholders in COP principles, including safety, security, data protection and children's rights;
- Adopt technical mechanisms that safeguard children and support productive and autonomous use of digital technologies by children;
- Position Rwanda as a centre for excellence of COP research, evaluation and innovation
- Promote national, regional and international cooperation on COP;
- Build an iterative process in which COP Policy is continuously reviewed and improved;

5.3 POLICY AREAS FOR CHILD ONLINE PROTECTION

5.3.1 Policy Area: COP Institutional Capabilities

Objective:

To establish a National COP Steering Committee and ~~to~~ establish a Stakeholder Group of experts to cover all areas of the COP Policy, coordinated by the Ministry of ICT and Innovation (MINICT).

Measures:

A) Publish a definitions and language manual: The Ministry of ICT and Innovation will publish a full list of definitions and language that reflect definitions used in international agreements.

B) **Establish a National COP Advisory Committee**: The National COP Advisory Committee will be responsible for policy implementation and development, and will serve as a focal point for national, regional and international cooperation. The Committee will address a broad set of competencies that cover all policy areas, and will supervise implementation and uphold standards.

C) Build a network of COP Champions: Establish a network of COP champions across all domains including, civil society organizations, Internet service providers, Academia, Religious Organizations. Key institutional stakeholders including the National Children Commission (NCC), Rwanda National Police, Rwanda Investigations Bureau, Rwanda Information Society Authority, shall designate a fully resourced desk department with experts in COP. This network will however aim to keep a network of reliable partners from civil society organization, private sector, Telecoms, Internet services providers, security, and international organizations among others.

E) Define performance indicators and evaluation: Each aspect of the implementation plan will have a corresponding expert coordinator with the authority and resources to successfully complete the task envisioned. Key Performance Indicators (KPIs), evaluation mechanisms and

clear reporting structures will be introduced. As the digital environment evolves rapidly, KPIs will require constant review.

5.3.2 Policy Area: Legal and Regulatory frameworks

Objective:

To strengthen and re-align the domestic legal and regulatory regimes related to COP, and to strengthen the capacity and capability of law enforcement agencies.

Measures:

A) Strengthen the capacity of law enforcement agencies. From first responders to judges, all actors in the law enforcement chain must be aware of COP. They will be offered training, including on how COP relates to their particular role, how to understand offending behaviour, and how to provide access to victim support. Shortcomings in enforcement and the judiciary will be identified, and measures will be put in place to increase awareness, reporting and successful prosecution. Cross-sector coordination and collaboration between industry and law enforcement will be encouraged.

B) Strengthen and enforce laws that prohibit COP-related offences. Criminal laws and procedures facilitate the investigation and prosecution of online offences that violate children's right to protection, and will be strengthened and amended in line with international standards and best practices. This will include enhancing sanctions and sentencing frameworks where necessary.

C) Introduce data protection regulations, ensuring that children's data is protected appropriately, collected only where necessary with the high levels of security and care. Such general regulations should include children's data given special category status, requiring higher levels of protection and other safeguards, and the introduction of parental consent for the online collection and processing of younger children's data.

D) Strengthen criminal investigation, prosecution and sentencing for online child sexual abuse[22]: Criminal justice agencies with responsibilities for COP-related offences will be

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[22]Child sexual abuse (CSA) is when a child is forced or persuaded to take part in sexual activities. This may involve physical contact or non-contact activities and can happen online or offline.

trained in COP issues, particularly in respect of online child sexual abuse, with the aim of driving greater prevention, successful prosecution and appropriate sentencing. The capabilities of the Rwanda Computer Emergency and Security Incident Response Team (Rw-CSIRT) and the Police Cybercrime and Investigation Centre shall be reviewed and strengthened to detect, prevent and respond to cyber security threats, specifically those related to COP.

E) Identify and ratify COP-related international treaties & protocols: Building a sustainable eco-system of COP requires a multi-stakeholder approach and participation in a global movement. Rwanda will identify and ratify relevant international and regional protocols and treaties.

5.3.3 Policy Area: COP Response System

Objective:

To establish a coordinated multi–stakeholder framework to tackle online child abuse.

Measures:

A) Establish methods of notice and takedown: Government institutions will work with industry to establish and monitor effective protocols for the notice and takedown of illegal child abuse material (CAM). Establish protocols to ensure, and legislation to permit, local ISPs block access to hosts that fail to take down notified content.

B) Establish process of offender risk management: An effective multi-stakeholder offender management process will be established, drawing upon international standards of good practice. Law enforcement and other criminal justice practitioners will be trained to recognise and investigate offending behaviours. Offender risk management is an essential component of COP, as individuals or groups of offenders can reach large numbers of child victims online.

C) Provide support for child victims: Organisations training practitioners in the mental health, psychology and social work fields who work with vulnerable children must be required to have a basic understanding of COP issues. The capabilities of all One Stop Centres will be strengthened to follow safeguarding and child protection procedures, provide support for victims, and escalate reports of online crimes to the relevant authorities. To be effective,

relevant practitioners must be provided with COP training, training on safeguarding and child protection policies, training on child counselling (to help children process trauma and prevent further victimisation), and training on family counselling (to prevent child victims from being ostracised by family members and being further victimised).

5.3.4 Policy Area: Technical Controls

Objective:

To promote safety-by-design, corporate responsibility and cultural awareness of COP.

Measures:

A) *Introduce corporate responsibility standards:* Industry has a responsibility to ensure that children are afforded protection online. In line with Rwandan values (see section 5.1), businesses will be required show what procedures and special considerations they have undertaken to ensure child safety and respect for children's rights as they extend their online services into Rwanda.

B) *Implement safety, rights by design:* Standards and codes of practice will be developed to require product designers, manufactures and service providers to uphold Rwandan values (see section 5.1) and contribute to children's online safety and security. Among other things, standards and codes of practice will aim to prevent children from seeing harmful or inappropriate content; to protect children's online privacy on the system or device-level; and to address concerns raised by the Internet of Things, connected toys and services with a streaming function

C) *Application of age-rating classification:* Consistent age-rating and classification of commercial content offers a transparent and effective approach to manage content and services accessed by children and may be required for relevant goods and services.

D) *Introduce flagging systems:* Mechanisms to identify and report upsetting or unsuitable content will be required of the service providers, transparent and robust monitoring systems must be in place for all online services. A free public hotline will be available for reporting and accessing specialist support and advice and provision of takedown mechanisms.

E) Ensure protection of children from commercial pressures: Efforts to protect children from commercial pressures will include: providing content filters, promoting safety-by-design, and raising awareness of the context in which children grow up. Products and services that are offered in line with Rwandan values (see section 5.1) may be certified, and action may be taken against purveyors of products and services that violate these values.

G) *Internet surveillance*: A deliberate effort shall be made to conduct surveillance of internet to detect content that is harmful to Children. The content in form of violent, nude and abusive images targeting Children shall be collected and analysed and stored for investigations.

H) Build a database of digital images and cases: The COP institutional stakeholders in Rwanda should work towards building a robust repository system of child abuse images and cases. The system would serve as a foundational tool to monitor whatever happens on internet and link cases to identity both the victims and criminal using Image hash values. The software shall have intelligent capabilities to determine or score the level of percentage for harmfulness of a picture like nudity or violence for use during prosecution & judgment process.

5.3.5 Policy Area: COP Education & Public Awareness

Objective:

To positively promote use of digital technology as a source of entertainment, information and educational content for children in a safe environment and also raise awareness of all COP issues, in order to prevent likely harms for different general public audiences.

Measures:

A) Establish COP Leads and Clubs in schools: There will be an establishment of COP clubs in schools as well as designating Child Protection Leads. Each lead shall be the champion to operate the club and lead to inculcating a culture of safety within the school. They will be responsible for enacting and enforcing child protection policies (including safeguarding procedures) in schools, be the point of contact for concerns relating to child protection and COP, and pass on reported harms to the relevant authorities. Leads should also facilitate intervention plans, to protect children against further harms.

B) Promote edutainment: Promote development of digital content that is entertaining in nature but still educative. This will focus to mainly support creation of content, including peer-to-peer programs, designed to educate through entertainment like games, puzzles that helps children develop digital skills and empowers children.

C) Mainstream COP into digital literacy: A programme of digital literacy will be introduced across the school curriculum and entire general public with a component of COP embodied. The programme will emphasise and encourage the positive, autonomous and creative use of digital technologies by children; clearly define the risks, benefits, and social outcomes of using technology; and will aim to ensure that protective and preventative measures are broadly disseminated, understood and applied.

D) Training on COP Matters: Training for teachers and professional development shall be encouraged to increase their knowledge to teach and monitor Children's safety. COP training must form a mandatory part of teaching degrees, at primary and secondary school level. All teachers must complete mandatory training on COP, be aware of school policy in relation to COP, and deliver COP lessons to students.

E) Design a public awareness programme: Awareness-raising strategies will produce materials that make clear the principles of COP and actions that can be taken to mitigate harms, report offences and seek redress. This information will be provided in simpler terms on the Ministry of ICT and Innovation's webpage. Targeted messages and materials will consider the specific needs of parents and children, with particular attention given to the youngest and most vulnerable children, including those with learning disabilities. Peer-to-peer education is a valuable strategy for children of all ages to get to know their rights and responsibilities online. This programme of public messaging can help children and adults to understand the issues and make wise choices about their online interactions, but is not a replacement for formal education, professional training, safety-by-design or corporate responsibility.

F) Embed COP into Informal education: Online safety education will start in early childhood and develop according to children's changing needs as they grow; specific materials will be produced to guide children of preschool age, caregivers and teenagers. Information will promote positive use of digital technology and consider the needs of all Rwandan children, regardless of gender, age, income or background. Information provided by third parties will be

expected to include the values articulated in the COP Policy and aim to help children of all ages to get to know their rights and responsibilities online. Community groups, youth clubs, families, churches and digital platforms will all be instrumental in driving effective COP education.

5.3.6 Policy Area: COP Research & Development

Objective:

To establish a COP research and innovation hub for the region.

Measures:

A) Establish COP research frameworks: As part of research support facilities provided to researchers, the different scholars shall be encouraged to conduct research projects within the domain of COP. Clear methodologies to mobilize researches in this areas and re-using their finds to inform policy implementation shall be followed.

B) Continued innovations: Research evidence will inform the development of products and services that incorporate safety-by-design; enable the evaluation of COP practice; and provide an understanding of children's online experiences in the Rwandan context.

C) Empower a centre of excellence: Identify and empower one institutions to be the centre of COP matters. An appropriate site shall be identified among existing higher learning institutions to be the main Excellency to COP matters*.*

5.3.7 Policy Area: COP Global Cooperation

Objective:

To collaborate with national, regional and global organizations and players to share best practice.

Measures:

A) Establish formal relationship frameworks (MoU) with regional and global COP communities: Strengthening international cooperation to enhance COP across the globe is critical to guarantee global security. Rwanda will formalise collaborations for joint PPP investments in areas related to cyber-security, COP capacity building, innovation, law enforcement, the justice system and education, among others.

APPENDICES

A. LIST OF ACRONYMS

Acronym	Expansion
ACRWC	African Charter on the Rights and Welfare of the Child
AYC	African Youth Charter
CAM	Child Abuse Material
COP	Child Online Protection
CRC	Convention on the Rights of the Child
CSA	Child Sexual Abuse
CSAM	Child Sexual Abuse Material
GCA	Global Cybersecurity Agenda
ICT(s)	Information and Communication Technology(ies)
ISP	Internet Service Provider
ITU	International Telecommunication Union
KPIs	Key Performance Indicators
MINICT	Ministry of ICT and Innovation
MoU	Memorandum of Understanding
NCC	National Children Commission
OECD	Organization for Economic Co-operation and Development

PPP	Public-Private Partnership	
RURA	Rwanda Utilities and Regulatory Authority	
Rw-CSIRT	Rwanda Computer Emergency and Security Incident Response Team	
SDGs	Sustainable Development Goals	
UN	United Nations9	
UNICEF	United Nations International Children's Emergency Fund	

Strategic Area	Thematic Areas	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	Lead (L) and Co-lead (CL)	Stakeholders	Budget (Rfw)
Institutional Capabilities	**Establish a National COP Advisory Committee:** There will be a national committee comprised of relevant stakeholders to oversee the overall implementation of the COP policy.	●					MIGEPROF (L) & MINICT (CL)	MINALOC, MINIJUST, MINEDUC, MINISPOC, MINIYOUTH, RIB, RNP, NCC, NECDP, NECC, RALC, RURA, RICTA, REB, PSF, CSOs, Any other organization	200,000,000
	Build a network of COP Champions: Establish a network of COP champions across all domains including, civil society organizations, Internet service providers, Academia, Religious Organizations, Media & Entertainment among others	●					MIGEPROF (L) & MINICT (CL),	MINALOC, MINIJUST, MINEDUC, MINISPOC, MINIYOUTH, RIB, RNP, NCC, NECDP, RALC, RURA, RICTA, REB, PSF, CSOs, Religious Organizations, Any other organization	
	Conduct trainings: Identify and conduct trainings to strengthen COP capabilities of key administrations/institutions dealing with child protection and development.	●	●	●	●	●	MIGEPROF (L) & MINICT (CL),	MINIJUST, MINEDUC, RDB, MINECOFIN, PSF, RNP, RIB, RISA RURA, other Stakeholders.	
	KPIs & Evaluation: In attempt to ensure performance, an exercise will be commissioned to establish baseline information by sector, conduct annual reviews and sector specific KPIs.		●	●	●	●	NISR (CL) NCC (L)	MINICT, MINEDUC, PSF, RURA, RBA, RNP, RIB, RISA RURA,PSF, CSOs, Other Stakeholders	

							Lead / Co-Lead	Stakeholders	Budget
Legal & regulatory Framework	**Legal & Regulatory Reviews:** A gap analysis exercise shall be conducted to review existing domestic and international legal and judiciary frameworks in order to strengthen COP enforcements. These can be in areas of Cyber Security, Human Trafficking, Children's Rights, online harms bill and benchmarking international practices.			●	●	●	MINIJUST (L) MIGEPROF (CL)	MINICT, RLRC RURA & other Stakeholders	20,000,000
	Legal and regulatory Capacity Building: A program framework shall be designed to provide training for key institutional actors and enforcement leads to ensure an understanding of COP matters including online risks that result in criminal activities.			●	●	●	MINIJUST (L) MIGEPROF (CL)	MINICT, RLRC RURA & other Stakeholders	
	Strengthen Data Protection Regulations: Introduce data protection regulation that caters for children data privacy along the principles of Privacy and Electronic Communications Regulations to ensure confidentiality, application of emerging technologies among others.		●	●	●	●	NISR (L) & RURA (CL)	MINIJUST, RISA, RIB, RNP & other Stakeholders	
Response System	**COP training program in focused interest groups:** As a response system, a training program shall be designed to up skill segmented groups including teachers and students in schools, professional development among responsible institution, investigators, law enforcers, ISPs, software developers etc.	●	●	●	●	●	NCC (L) RISA (CL)	REB, RDB, RBI, RNP, RISA	300,000,000
	Protection from Commercial Pressure: A responsive mechanism shall be put in place to regulate influencer advertisement by introducing explicit notices, introduce standards based on Rwandan values, issue clear guidelines for all organizations and services operating in Rwanda.	●	●	●	●	●	NCC (L) PSF (CL)	NECDP, RICTA, RURA, RISA, other Stakeholders	

Action						Lead	Collaborators	
Content take-down: A framework shall be established to introduce protocols for removal of materials from internet or other mediums that relate to abuse of Children. Take down procedures shall apply to all Industry operators especially the Internet service providers, Communication Service Providers, entertainment and media industry.		●	●	●		RURA (L) RISA(CL)	RBI, RNP. RMHC, RICTA, PSF,	
Victim Support: As part of supportive role, the identified victims for Child abuse shall be identified, empowered and counselling. The one stop center should provide a range of services that including counselling services, post traumatic disorder management, first aid medical services, laboratory examinations, security protection for the Child victims among others.	●	●	●	●	●	RIB (L) NCC (CL)	MIGEPROF, MOH, NECDP,	
Self-regulation program: Through public awareness, promote a culture rooted in Rwandan values to strengthen a spirit of self-regulation. The Self-regulation works involve actively every player including Children communities, Parents, Teachers, ISPs, Telecoms, Media, Civil society organizations, international organizations among others.		●	●	●	●	RURA (L) RISA (CL)	MINICT. MIGEPROF, RICTA, RHMC, RTV,	
Strengthen Criminal Investigation process: There criminal investigation process should be strengthened by building capabilities across the entire chain of investigation, prosecution and sentencing.	●	●	●	●	●	NPPA (L) RIB(CL)	MINICT. MIGEPROF, MINICT, RNP, All	

Role of Internet Service Providers and Telecoms: It is recommended that RURA works with institutions charged with child online protection initiative to elaborate industry practices for ISPs and CSPs to always provide necessary information and take actions leading to protect Children who have been victimized online by internet users. RURA should enforce this to ISPs and CSPs as a licence obligation qualification,	●	●	●	●	●	RURA (L) RISA (CL)	RICTA, PSF, NCC, NCEDP,	
Publicize Technical controls: Identify a set of technical options available on market designed to control Children exposure to harmful content found online. An engagement with the industry shall be conducted to list like applying to TV controls, Age-rating classification for certain channels, introduce flagging systems, special software in computers distributed for schools etc.	●	●	●	●	●	NCC (L) RISA (CL)	MINALOC, MIGEPROF, MINICT, RHMC, PSF, RNP, RIB,	
Internet surveillance: A deliberate effort shall be made to conduct surveillance of internet to detect content that is harmful to Children. The content in form of violent, nude and abusive images targeting Children shall be collected and analyzed and stored for investigation.	●	●	●	●	●	RBI (L) RURA (CL)	RNP, RISA, RICTA, Other organizations	
Build a database of digital images and cases: The COP institutional stakeholders in Rwanda should work towards building a robust repository system of child abuse images and cases. The system would serve as a foundational tool to monitor whatever happens on internet and link cases to identity both the victims and criminal using Image hash values.	●	●	●	●	●	RIB (L) RISA (CL)	MINICT, MIGEPROF, RURA RISA, NCC, NCEDP, , RICTA	

Education and Public Awareness	**Establish COP clubs in schools**: Mainstream COP affairs into the learning process by establishing clubs in schools, incorporate COP curricula, undertake awareness campaigns led by Children themselves. Ensure understanding of online risks.	●	●	●	●	●	REB (L), RISA (CL)	RURA, WDA, RP, NCC, NECDP, Other organizations	500,000,000
	Promote positive use of Internet: Promote positive internet use (e.g., digital literacy, edutainment & educational content schemes, Create peer-led programs for promoting safe and positive internet use.	●	●	●	●	●	REB (L), RISA (CL)	RURA, WDA, RP, NCC, NECDP, Other organizations	
	Training of professionals: There needs to be a strong emphasis to train professional from all kinds of domains including those in tertiary education, training for school head teachers/teachers, psychologists, counsellors etc.	●	●	●	●	●	MINEDUC (L) MINICT (CL)	MIGEPROF,MINIJUST, , MOH NCC, RISA, RNP, RIB,	
	Specialized training/awareness for parents: A deliberate awareness and training program should be designed for parents about COP matters. More than anyone else, the parents have a high stake in mentoring Children and empowering them to navigate the digital world right from the early age.	●	●	●	●	●	MINALOC (L) MIGEPROF (CL)	MINEDUC, MINIJUST, RBI, RNP, NCEDP, NCC, RURA, RBA, RMHC	
	Messaging for general public: There has to be a generic message designed to educate the public about the COP matters across different for. Opportunity areas might include use of images, establish on government webpages, disseminate messages across communities in Umuganda, Sports days, launch an internet safety media campaign, peer- to-peer campaign among others.	●	●	●	●		MIGEPROF (L) MINICT (CL)	MINALOC, MINEDUC, RIB, RNP, NCEDP, NCC, RURA, RBA, RMHC	

	Activity						Lead/Co-lead	Stakeholders	Budget
Building COP Industry, Research and Development	**Promote Research & Development:** COP issues should be mainstreamed into normal channels of research where different researchers at Universities or students start identifying patterns leading to the intensity of COP harms.		●	●		●	MINEDUC (L), MINICT (CL)	MIGEPROF, Universities, ICT Chamber, NCC, NECDP, RISA	300,000,000
	Promote Innovations: Good research should be complemented by designating efforts to do their own research instead into developing innovative solutions and services that response.		●	●	●	●	MINICT (CL), PSF(CL)	MINEDU, Universities, ICT Chamber NCC, RISA	
	Empower a Centre of excellence: Identify and empower one institutions to be the centre of COP matters. An appropriate site shall be identified among existing higher learning institutions to be the main excellency to COP matters.		●	●	●	●	MINEDUC (CL), MINICT (CL)	MIGEPROF, Universities, NCC, RISA, ICT Chamber	
Regional & International Cooperation	**Ratify and domesticate international treaties**: The COP has got a lot of international charters and call for actions which countries should ratify and conform to. Such treaties/protocols should be identified and signed for compliance.		●	●	●	●	MIGEPROF (L) MINICT (CL)	MINAFFET, MINIJUST,MINIJUST, RLRC, NCC, NECDP, Other stakeholders	200,000,000
	Establish formal collaboration: Institutions and organizations of similar mandate shall be identified to establish formal partnership at both national, regional and international arena. Interest players in COP initiatives.	●	●	●	●	●	MIGEPROF (L) MINICT (CL)	MINAFFET, MINIJUST,MINIJUST, RLRC, NCC, NECDP, Other stakeholders	
								Total budget for 5 years Rfw : **1,520,000,000**	