NATIONAL CHILD ONLINE PROTECTION FRAMEWORK

contents

foreword

Expanding internet access for children and young people offers an open and powerful avenue to acquire information, assert their right to education, innovation, and claim social, economic, and political opportunities for their empowerment. At the same time, these opportunities may increase vulnerability to violence, including cyberbullying, online child sexual exploitation, abuse, and cyberstalking among others.

The Ministry of Communications and Digitalisation through the National Cyber Security Centre/Cyber Security Authority (NCSC/CSA) with the support of UNICEF Ghana, in observing the increased reliance of children on the internet and digital devices especially during the COVID-19 pandemic, has made the security of children online a priority. The collaboration has led to the establishment of a Child Online Protection (COP) Unit with the sole mandate of ensuring a safer, responsible, and sustainable cyberspace that encourages the participation, protection, and promotion of digital literacy among children and young people. The NCSC/CSA in its approach and strategy to secure Ghana's digital ecosystem developed a 5-year National Cyber Security Awareness Programme (NCSAP) dubbed "A Safer Digital Ghana Campaign". The campaign is aimed at targeting four thematic areas namely, Children, the Public, Businesses, and Government. Additionally, the NCSC/CSA has developed the Cybersecurity/Cybercrime Incident Reporting Points of Contact to provide an effective mechanism for children to report suspected and identified cybercrime and cybersecurity incidents in the country to the National Computer Emergency Response Team (CERT-Ghana).

The National Child Online Protection (COP) Framework is aimed at tackling the incidents of Online Child Sexual Exploitation and Abuse including child sexual abuse material, online harassment, and cyberbullying against children, as well as preventing inappropriate collection and possession of children's data by service providers. The Framework includes the WeProtect Global Alliance Model National Response (MNR) with six (6) main themes and twenty-one (21) capabilities.

Impressed by the overwhelming level of commitment and collaboration by all stakeholders and the unflinching support of our development partners, the team at the Ministry is confident that this framework will serve as an effective guide towards joint efforts in ending Online Child Sexual Exploitation and Abuse (OCSEA) in Ghana.

Mrs. Ursula Owusu-Ekuful, MP
Minister for Communications and Digitalisation,
Republic of Ghana

statement

The internet is vast and has the potential to offer limitless opportunities to children and young people when it comes to education and skills development, communication and entertainment. Children learn and access information from various parts of the world, providing them with immense opportunities which eluded the previous generation especially in the Global South, however, these opportunities which seeks to change the life stories of most children come with new challenges to their safety and security online.

Given that the internet is a critical tool for communication and education in today's world, any activity that seeks to undermine the freedom of children online is an affront to their rights. Child online abuse is a national and global concern, and the Cyber Security Authority (CSA) is committed to its role to ensure that children and young people have safe online experiences.

Ghana has shown enormous commitment to the online safety of its children and young people, and this is evident in the passage of the Cybersecurity Act, 2020 (Act 1038) which criminalises various online abuses against children (sections 62-66), the prioritisation of COP issues in Ghana's National Cybersecurity Policy and Strategy is another intervention aimed at addressing current developments and risks related to the activities of children and young people in the cyberspace.

This National Child Online Protection (COP) Framework represents a tailor-made, focused response to the increasing risks children faces on the internet which aligns with international best practices and provides a holistic approach to address the challenges. It also provides the necessary guidelines and tools to all stakeholders involved in protecting children's rights online to ensure the full participation, protection, and promotion of digital rights of children in Ghana.

As a national agency with responsibility over child online protection issues, the Cyber Security Authority is mindful of its mandate to ensure that every child has a safe online experience. We however consider this mandate a shared mandate – involving all stakeholders, including Parents, Teachers, Guardians and Educators, Policy Makers, Industry Players and the Children themselves. The Authority will therefore work closely with all stakeholders including Ghana's international partners for effective implementation of the framework.

We look forward to work with all of you to operationalise this Framework to ensure a safer online experience for every Ghanaian child.

Dr. Albert Antwi-Boasiako
Director-General, Cyber Security Authority,
Republic of Ghana

executive summary

Child Online Protection (COP) is an emerging topical issue in Ghana. The initiative is geared towards the prevention of violence and threats against children through the internet and other mobile technologies through awareness creation, capacity building and local and international cooperation.

As part of the efforts to protect children online, the International Telecommunication Union (ITU) launched the COP initiative in 2008 to solely deal with Online Child Sexual Exploitation and Abuse (OCSEA) and other cyber-related offenses, particularly against children and young people. The scale, severity, and complexity of OCSEA has increased faster than those aiming to tackle the activity can respond. While technology does not cause OCSEA, it enables and facilitates it on a wider scale than before. The rapidly accelerating growth of digital technologies has fundamentally altered the overall child protection landscape. The misuse of these technologies by sexual offenders enables unprecedented access to children, and new capabilities to abuse children on a mass scale. At the same time, bullying, harassment, and other forms of peer-to-peer violence have become a regular feature of the social media platforms that children use to play and socialise.

The transborder nature of the internet means that efforts to protect children must extend to include regional and international collaborations. Children's online safety must become an integral part of cyber and internet policy. Governments worldwide have sought to introduce policies to restrict the circulation of harmful and illegal content to foster digital safety. These steps are intended to encourage more responsible online practices by children and the community. However, a concern is to ensure that the protection of children online does not hinder the capacity of children to take advantage of the opportunities afforded for learning, research, communication, and entertainment. The entire global community acknowledges and appreciates the tremendous benefits of ICT; however, there is a worldwide concern to fight against its adverse use, particularly relating to OCSEA.

A national framework consistent with best practice is imperative to provide a national direction for the protection of children online. As a result, a National COP Framework has been developed to coordinate and regulate COP matters in the country. The Framework is expected to tackle incidents of Online Child Sexual Exploitation and Abuse (OCSEA), online harassment, and cyberbullying against children (across all platforms; social media, mobile, gaming, etc), and prevent inappropriate collection and processing of children's data by service providers (safety by design for all Ghanaian built platforms). It is also intended to guide Government, Industry, Civil Society Organisations, Educators, Parents and other relevant stakeholders to work together within the goal and objective of the Framework to protect children from all forms of online abuse.

Though the Framework refers to the WeProtect Global Alliance Model National Response (MNR) based on the six (6) themes and capabilities for ensuring that children have a safer online experience, it also incorporates elements from the ITU 2020 Guidelines on COP and General Comment 25 of the Convention of the Rights of the Child. The development of the framework is centred on the local needs of children in Ghana.

The realisation of children's rights and their protection in the digital environment requires a broad range of legislative, administrative, and other measures, including precautionary ones. The COP Framework seeks to combine these measures by establishing the legal and institutional framework in line with international human rights standards, whilst remaining relevant, in the context of technological advancement and emerging practices.

As the regulator, the Cyber Security Authority (CSA) is mandated by the Cybersecurity Act, 2020 (Act 1038) to coordinate policies, guidelines and programmes relating to cybersecurity including child online protection among government Ministries, Departments and Agencies (MDAs), schools, ICT sector and cooperate with businesses, civil society, academia and child friendly organizations to realize children's rights in relation to the digital environment at the cross-sectoral, international, national, regional and local levels.

As COP is a collaborative exercise, the CSA will work with relevant MDAs to integrate COP within national child protection policies. The government of Ghana has put in place measures to protect children from risks, including cyberaggression and digital technology-facilitated and online child sexual exploitation and abuse to ensure the investigation of such crimes and provide remedy and support for child victims.

The Framework seeks to ensure the operation of effective child protection mechanisms online and safeguarding policies, while respecting children's rights, in all digital settings. The evolving capacities of children should be a major consideration in addressing the risks and opportunities associated with children's engagement in the digital environment depending on their age and stage of development, while bearing in mind the changing position of children's competence and understanding, which develop unevenly across areas of skill and activity, and the diverse nature of the risks involved whilst exercising their digital rights.

In line with this, the Framework seeks to promote awareness among parents and caregivers through Parents' Forum, awareness creation programmes and development of guidelines to support parents and caregivers in acquiring digital literacy and awareness of the risks to children in order to help them to assist children in the realisation and protection of their rights in relation to the digital environment.

As research will be the backbone of interventions envisaged by the Framework, regularly updated data and research will be crucial to understanding the implications of the digital environment for children's lives, evaluating its impact on their rights and assessing the effectiveness of government interventions. This Framework will ensure the collection of robust, comprehensive data, disaggregated by age, sex, disability, geographical location, ethnic origin, and socioeconomic background.

The Framework will ensure that pre-service and in-service training relating to the digital environment is provided for professionals working at all levels of education, to support the development of their knowledge, skills and practice.

The CSA shall involve civil society organisations working in the field of children's rights and those concerned with the digital environment, in the development, implementation, monitoring and evaluation of laws, policies, plans and programmes relating to children's rights.

The Government as part of its efforts to protect victims will ensure an effective remedy and reparation for OCSEA victims and their parents/caregivers. Services will consider gender, age, level of maturity and the rights and needs of the child, avoiding unnecessary procedures and interviews, to prevent further trauma and to promote the physical and psychological recovery and social reintegration of victims.

This Framework comprehensively deals with COP from issues of privacy to violent and inappropriate content, to online fraud and grooming, sexual abuse and exploitation. Issues of extremism, hate speech, terrorism and suicide are also addressed in this Framework.

In developing this Framework, the CSA in consultation with relevant stakeholders sought to create a flexible and adaptable framework firmly based on international standards. This Framework enables Ghana to meet its obligation in protecting children online.

This Framework addresses leading risks to children online, including harmful and illegal content, harassment, cyberbullying, misuse of personal data, or grooming for sexual purposes and child sexual abuse and exploitation and extremism. Due to the rapid advancements in technology, policies on COP will be updated when required, as new challenges will emerge with the development of technological innovations.

The Framework ends with an implementation plan, detailing the strategies needed to achieve the themes and capabilities of the major international instruments that guided this process.

Introduction

1.0 Introduction

In January 2023, it was reported that Ghana had 68.2% internet penetration rate (23.05 million internet users out of 43.88 cellular mobile connections) and 6.6 million (19.5% of the population) social media users. Clearly, the internet and digitalisation play a major role in the realisation of the country's socio-economic fortunes. Although this development is a good indicator of citizens going more digital and leveraging on the benefits the internet provides, the inherent risks, that is, cyber-attacks and cybercrimes, have become prevalent.

2017 research on child online activities revealed the dangers children on the internet. It indicated that:

- Two (2) out of ten (10) children between the ages of nine (9) and seventeen (17) have received sexual messages in words, pictures, or videos through social network sites,
- Four (4) out of 10 children have seen sexual images online.
- Two (2) out of ten (10) children have met someone face to face that they became familiar with on the internet.
- Four (4) out of ten (10) children do not feel safe on the internet and
- Five (5) out ten (10) children have had upsetting experiences while online.

The research emphasizes that children are most vulnerable online as they are exposed to various cyber threats and attacks by cyber-criminals and online predators. The situation has attracted global attention where countries have shown commitment to the cause of preventing and protecting children from all forms of online abuse.

Exposure to inappropriate or even criminal content can lead children to extremes such as self-harm, destructive, and violent behaviours. Exposure to such content can equally lead to radicalisation or subscription to discriminatory ideas. It is recognised that many children do not abide by the age limitations placed on websites, videos, games and television programmes.

Policies remain essential for the protection of children online. In recognition of this, the Government of Ghana has demonstrated commitment to protect and address the risks related to children's activities online through the signing of conventions and protocols which include but not limited to, the following:

- United Nations Convention on the Rights of the Child
- Convention on Cybercrime (Budapest Convention)
- African Union Convention on Cybersecurity and Personal Data Protection (Malabo Convention)
- ECOWAS Decision on Personal Data Protection
- The African Charter on the Rights and Welfare of the Child

In line with the UN principles regarding children, in 1979, the government of the day established the Ghana National Commission on Children to cater for the general welfare and development of children by promoting the UN Rights of the Child. In 2000, the government upgraded the Commission into a ministry as the Ministry of Women and Children Affairs which is currently known as the Ministry of Gender, Children and Social Protection (MOGCSP). In dealing with OCSEA issues, MOGCSP has worked closely together with the Ministry of Communications and Digitalisation (MoCD), the Ministry of Education (MoE) and the Ministry of Youth and Sports (MOYS), and the Domestic Violence and Victim Support Unit (DOVVSU), and Cybercrime Unit of the Ghana Police Service under the Ministry of the Interior.

Ghana was the first country to ratify the United Nations (UN) Convention on the Rights of the Child (CRC) in 1990. Subsequently, this was domesticated in the Children's Act, 1998 (Act 598). Other child-friendly laws like the Juvenile Justice Act, 2003 (Act 653), the Domestic Violence Act, 2007 (Act 732), the Human Trafficking Act, 2005 (Act 694) and amendments to the Criminal and Other Offences Act have been promulgated to protect children.

With the rights of the child enjoyed in the country, children have minimal inhibitions to assert themselves physically, socially, culturally, and virtually. As we are in a digital age, children have not been left out as ICT is an integral part of the education, socialisation, and recreation for children. Unfortunately, the risks and harms affecting adults on the internet are the same affecting children, making COP a critical national consideration.

The Government of Ghana through the MoCD recognised the importance of protecting children on the internet through the inclusion of COP in its legal and institutional framework to provide national direction on children's rights online.

Ghana's cybersecurity readiness has been ranked 3rd in the African continent behind Mauritius and Tanzania, with a score of 86.69% . According to the previous report of the ITU, Ghana's current score on the metric shows major progress from the previous ratings in 2017 and 2018 of 32.6% and 43.7% respectively. The country's 3rd place ranking in Africa is also a major leap from the 10th and 11th places attained in the previous ratings and projects Ghana among the best in the region and globally which Ghana ranked 43rd. Ghana's commitment to establish and operate a world-class Cyber Security Authority led to the development of Goal 1:25, the short to medium term vision of the Authority to be ranked as the first national cybersecurity institution in Africa and among the top 25 globally. To attain this ambitious goal, COP issues in the country should be tackled holistically and vigorously with all relevant stakeholders. The National COP Framework is the policy document which will align COP issues with the National Cybersecurity Policy and Strategy for effective implementation.

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[1] Digital 2023: Ghana — DataReportal – Global Digital Insights
[2] Risks and Opportunities related to Children Online Practices (2017) by UNICEF-Ghana, in collaboration with the Ministry of Gender, Children and Social Protection and the Ministry of Communications (MoC) now Ministry of Communications and Digitalisation
[3] Global Cybersecurity Index (GCI) of the International Telecommunication Union (ITU) (2021)
[4] Global Cybersecurity Index (GCI) of the International Telecommunication Union (ITU) (2020)

International and Regional Context

2.0 International and Regional Context

The cross-border and transnational nature of the digital environment necessitates strong international and regional cooperation, to ensure that all stakeholders, including businesses and other actors, effectively respect, protect, and fulfil children's rights in relation to the digital environment. The CSA shall cooperate bilaterally and multilaterally with national and international non-governmental organizations, United Nations agencies, businesses and organisations specialised in child protection and human rights in relation to the digital environment. The CSA shall promote and contribute to the international and regional exchange of expertise and good practices and establish and promote capacity-building, resources, standards, regulations, and protections across national borders that enable the realisation of children's rights in the digital environment by all States. Below are international instruments that guided the development of this Framework.

2.1 International Telecommunication Union (ITU) Guidelines 2020

According to the ITU, Child Online Protection (COP) is the holistic approach to building safe, age appropriate, inclusive, and participatory digital spaces and to respond to all potential threats and harms children and young people may encounter online. In 2007, the ITU launched the Global Cybersecurity Agenda (GCA) framework to protect the global cyberspace. The GCA provides five pillars which consist of:

- Legal Measures
- Organisational Structures
- Technical and Procedural Measures
- Capacity Building and
- International Cooperation

International Telecommunication Union (ITU) Guidlines 2020

Legal Measures: A strong and comprehensive child protection legislative framework is in place at the national level to address internet safety issues.

Technical and Procedural Measures: Children and young people communicate using several platforms, so their protection is made paramount by default. It also means proactiveness on the part of providers.

Organizational Structures: Good organizational structures must be in place at the national level to facilitate the infrastructure for a safe and trustworthy digital space.

Capacity building: An effective awareness-raising strategy must be in place at the national level taking into consideration a country's peculiar needs.

International cooperation: The internet knows no boundaries; the COP initiative takes into consideration that online child abuse is a global crime that requires international collaboration.

The Plenipotentiary Conference of the International Telecommunication Union held in Dubai in 2018, reaffirmed the importance of the COP Initiative by acknowledging it as a platform to raise awareness, share best practices, and to provide assistance and support to Member States, especially developing countries, in developing and implementing COP roadmaps. It also recognised the importance of the protection of children online within the framework of the United Nations Convention on the Rights of the Child and other human rights treaties by encouraging collaboration between all stakeholders involved in child online protection. The Conference recognized accessibility for persons with disabilities and persons with specific needs to telecommunication or information and communication technology (ICT) and on the role of the ITU Telecommunication Development Sector (ITU-D) in child online protection.

The ITU in collaboration with UNICEF developed its very first set of COP Guidelines in 2009. To respond to the current trends, an updated set of COP Guidelines was launched in 2020 targeting parents and educators, industry and policymakers. The 2020 Guidelines have been significantly updated and reviewed by experts establishing a broad set of recommendations to protect and empower children in the digital environment.

2.2 General Comment 25 of the United Nations Convention of the Rights of the Child

The United Nations Convention on the Rights of the Child is an international human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children. This treaty was adopted by United Nations (UN) Member States in 1989. Ghana became the first country to ratify the Convention of the Rights of the Child in 1990, later domesticating it into the Children's Act, 1998 (Act 560).

In 2021, the UN Committee on the Rights of the Child adopted the General Comment 25 on children's rights in the digital environment. The objective for the General Comment is for countries to implement the Convention in relation to the digital environment and provide guidance on relevant legislative, policy and other measures to ensure full compliance with their obligations under the Convention and its Optional Protocols in the light of the opportunities, risks and challenges in promoting, respecting, protecting and fulfilling all children's rights in the digital environment.

The Framework is guided by the principles and values outlined in the UNCRC and by extension, the General Comment 25 to the principle on children's rights in the digital environment.

2.3 WeProtect Global Alliance

WeProtect Global Alliance was established by the UK Government in 2014 and relaunched in 2020 as a global multi-stakeholder response to combat child online sexual abuse. WeProtect Global Alliance (WPGA) brings together governments, the private sector, civil society organisations, and international organizations to develop policies and solutions to protect children from sexual exploitation and online abuse. It is a global movement dedicated to ending online-facilitated child sexual exploitation and abuse (OCSEA) on the global agenda and aims to bring together the influence, expertise and resources required to transform how online abuse is dealt with worldwide.

WPGA has produced the Model National Response (MNR) to help countries assess their current response and identify gaps, prioritise national efforts to fill gaps, and enhance international understanding and cooperation.

This comprehensive framework and easy to adapt document take into consideration the scope of all child online abuse-related incidents which consist of six (6) themes namely:

2.3.1 Policy and Governance
- Leadership
- Research and Analysis
- Legislation

2.3.2 Criminal Justice
- Dedicated Law Enforcement
- Prosecutors and Judiciary
- Offender Management Process
- Access to Image Database

2.3.3 Victim Support Service and Empowerment
- End to End Support
- Child Protection Workforce
- Compensations, Remedies, and Complaints arrangements
- Child Helpline

2.3.4 Societal
- Online Child Sexual Exploitation and Abuse (OCSEA) Hotline
- Education Programme
- Child Participation
- Offender Support Systems

2.3.5 Industry
- Takedown Procedures
- CSEA Reporting
- Innovative Solution Development
- Corporate Social Responsibility

2.3.6 Media and Communication
- Ethical and informed media reporting
- Universal Terminology

2.4 Sustainable Development Goals

The Sustainable Development Goals (SDGs) is a set of universal goals that meet the urgent environmental, political, and economic challenges facing our world. The 2030 Agenda for Sustainable Development recognizes that ICTs as a key enabler to attain the SDGs. The SDGs have specific targets for the use of ICTs for sustainable development in education (Goal 4), gender equality (Goal 5), infrastructure (Goal 9 – universal and affordable access to the Internet) and Goal 17 – partnerships and means of implementation. The 2030 Agenda for Sustainable Development addresses various aspects of child online protection in the Sustainable Development Goals (SDGs), SDGs 1, 3, 4, 5, 8, 9, 10 and 16. The COP Framework seeks to build on and implement all these standards in the Ghanaian context.

Child Online Protection (COP) in Ghana
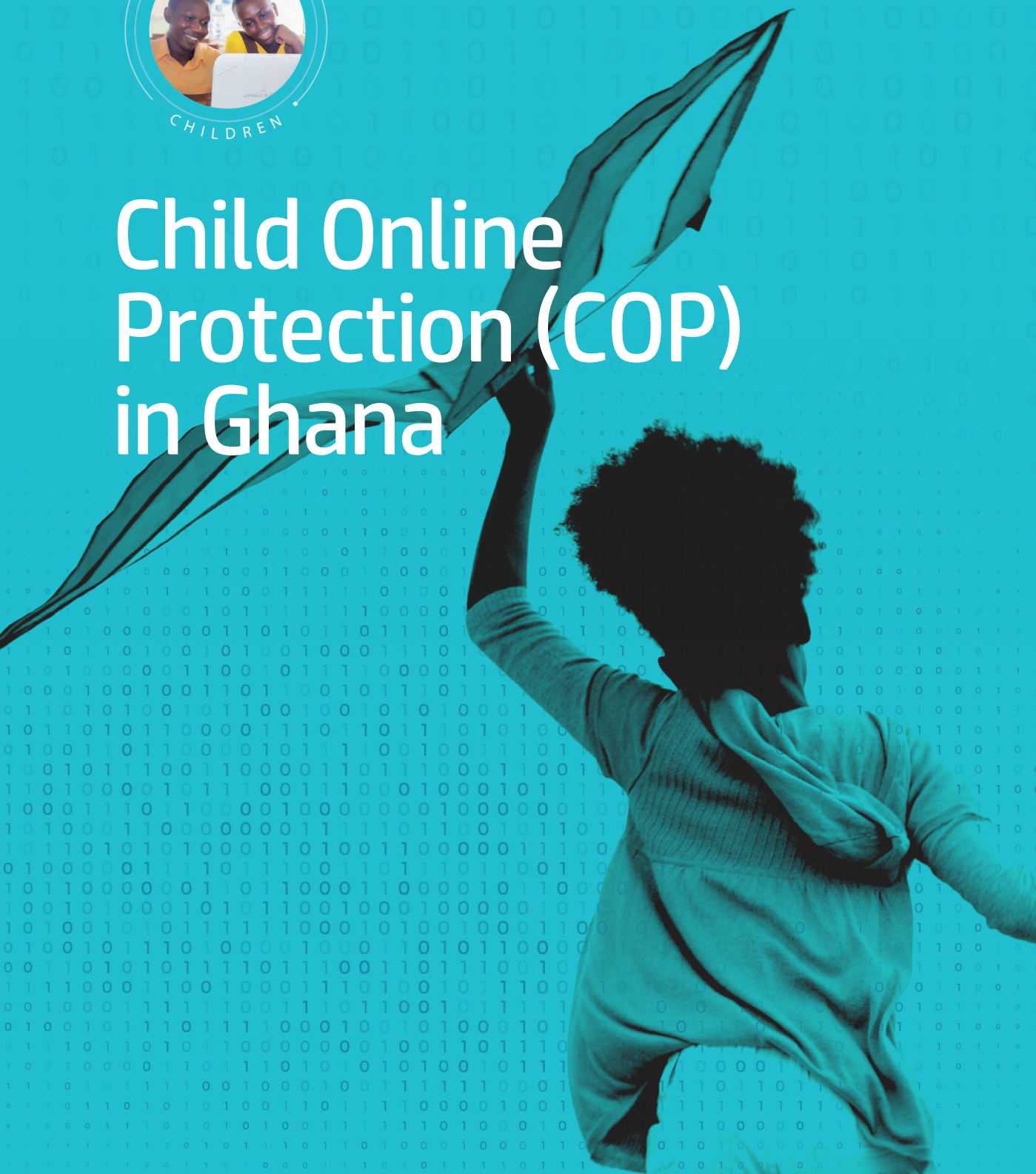
3.0 Child Online Protection (COP) in Ghana

In 2018, the Government of Ghana through the then Ministry of Communications (MoC) now the Ministry of Communications and Digitalisation (MoCD), established the Cyber Security Authority (CSA), as an agency responsible for national cybersecurity regulation. The CSA is mandated to regulate cybersecurity activities in the country; prevent, manage and respond to cybersecurity threats and incidents; promote the development of cybersecurity in the country to ensure a secured and resilient digital ecosystem; establish a platform for cross-sector engagement on matters of cybersecurity for effective co-ordination and co-operation between key public institutions and the private sector; create awareness of cybersecurity matters, and collaborate with international agencies to promote the cybersecurity of the country.

A Child Online Protection (COP) Division was created under the CSA to oversee policy development; build capacity and create awareness on online child safety and related cybersecurity issues; provision of victim support; and research and develop practical tools to help minimise the risks children face online. The COP Division works in collaboration with international and local relevant stakeholders.

To complement efforts in promoting the COP initiative, the Government of Ghana has enacted the Cybersecurity Act, 2020 (Act 1038), which establishes the Cyber Security Authority; to regulate cybersecurity activities in the country; to promote the development of cybersecurity in the country and provide for related matters. Sections 4(j), 62-68 of the Cybersecurity Act, 2020 provides for the protection of children online including indecent images and videos of children, online grooming for purposes of sexual abuse, and cyberstalking of children among others.

The reviewed National Cybersecurity Policy and Strategy prioritises COP issues to address current development and trends related to children and young people's activities in the cyberspace. Findings from the 2017 UNICEF report and the MoCD served as the country baseline for the development of the new COP Framework. The findings revealed that 4 in 10 children have seen sexual images at least once during the past year. Nearly a quarter of all surveyed children received such messages on their phones with the majority indicating that they felt uncomfortable, shy, or embarrassed being exposed to these pornographic images. The same study showed that 2 in 10 children have met someone face-to-face whom they first got to know on the internet; 25% of them were upset by this meeting. About half of all the surveyed children expressed difficulty talking with their parents/guardians/caregivers about such exposures to sexual images.

The need to make the online space safer for children and young people has assumed national prominence, triggering stakeholder meetings and consultations around the topic. Other efforts to improve COP culminated in the development of the National Framework for COP which was led by the MoC in August 2016. The updated version of the National COP Framework has been informed by the ITU COP Guidelines (2020), Convention on the Rights of the Child (CRC) General Comment 25 and the 2020 WeProtect Global Alliance's Model National Response to OCSEA while reflecting on the COP provisions in the Cybersecurity Act, 2020 (Act 1038).

Following its establishment, the MoCD through the CSA launched a National Cybersecurity Awareness Programme dubbed 'A Safer Digital Ghana'. The key focus of the programme was to raise awareness of cybercrime and the need to improve Ghana's cybersecurity readiness among Children, the Public, Businesses, and the Government.

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[7] *UNICEF, Risks and Opportunities Related to Child Online Practices Report (2017)*

The Cybercrime/Cybersecurity Incident Reporting Points of Contact (POC) was launched in 2019 as part of national efforts to provide avenues for the reporting and proper handling of cyber alerts, cyber incidents, and suspected vulnerabilities. The POC consists of six (6) activated digital platforms namely, phone call, SMS, WhatsApp, Email, online form, and the CSA Ghana app.

The Internet Watch Foundation (IWF) Child Online Protection Reporting Portal has also been operationalised by the CSA to enable reporting and takedown procedures of images and videos of illegal content of children and young people encounter online.

3.1 The National Child Online Protection Framework Rationale

The Framework is developed in line with the Cybersecurity Act, 2020 (Act 1038), CRC General Comment 25, the 2020 version of ITU Guidelines and the WeProtect Global Alliance Model National Response (MNR). The Framework is the rallying point for all COP actors to implement COP interventions, as well as monitoring and evaluation of COP for government, industry players, Civil Society Organisations (CSOs), educators, and other stakeholders. Strategies have been developed in this framework to challenge the shame and stigma of victims and survivors suffer through advocacy, awareness creation and educational initiatives.

3.2 Target Group

CSA will bring together all the key stakeholders and players to focus on developing and implementing a national initiative around making the internet a safer place for children and young people. This Framework will be used by all the relevant stakeholders with an interest in online child protection. In implementing this Framework, the CSA will engage with these stakeholders in particular:

- Government Ministries, Departments and Agencies
- Law enforcement
- Department of Social Welfare and Community Development
- Internet Service Providers (ISPs) and other Electronic Service Providers (ESPs)
- Mobile phone network providers
- Public Wi-Fi providers
- Relevant hi-tech companies
- Parent and Teacher associations
- Children and young people
- Child protection and other relevant NGOs
- Academic and research community
- Owners of Internet cafés and other public access providers
- Online gaming and betting centres

4.0 National Child Online Protection Framework

The Framework shall take the following as baselines in the implementation of the identified strategic areas.

4.1 Goal

The overarching goal of this Policy is to ensure a secure, responsible, and sustainable cyberspace that encourages the participation, protection, and promotion of digital literacy among children. This goal will be pursued through its broad objectives, which are based on lessons from the consultative meetings, achievements and challenges outlined in the preceding chapters and sections of this document; and will be guided by principles outlined in the following sections.

4.2 Objectives

The objectives of the Framework are to:

- Establish a governance framework to drive and guide COP development and implementation.
- Establish a legal framework for the investigation, apprehension, and prosecution of offenders of cybercrimes related to children.
- Identify key stakeholders and their respective roles in the provision of victim and offender support.
- Establish technical infrastructure that enhances information sharing, safeguards children, and supports the productive use of digital technologies.
- Create safe online information, education, and communication materials to enhance cyber hygiene practices among children and young people.
- Promote research development in COP to understand the current trends of risks and opportunities.

4.3 Guiding Principles

The following principles provide a lens through which the implementation of all other rights under this Framework should be viewed, serving as a guide for determining the measures needed to guarantee the realization of children's rights in the digital environment:

- Non-discrimination;
- Best interests of the child;
- Right to survival and development;
- Right to protection from violence, abuse, and exploitation;
- Right to be heard (participation);
- Evolving capacities of children; and
- Strong partnerships, collaboration, and linkages with other formal and informal sectors including the private sector.

Strategic Areas for Child Online Protection Framework
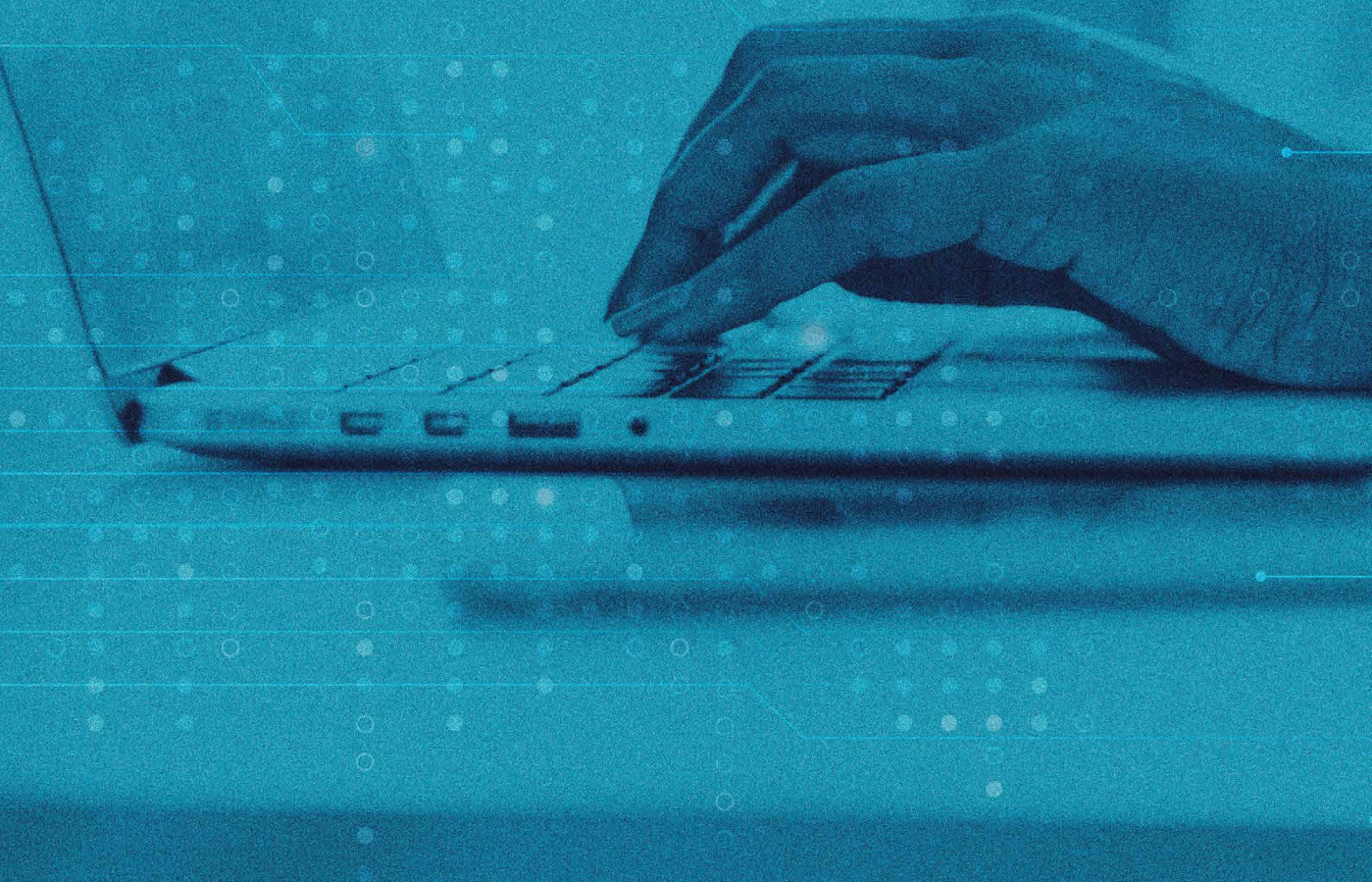
5.0 Strategic Areas For Child Online Protection Framework

This section outlines strategic areas the Cyber Security Authority will oversee and enforce through institutional arrangements. The Strategic Areas were developed out of the situational analysis and the policy context in Ghana. It also presents respective focus areas and strategic measures on actions to be carried out under each area.

5.1 Strategic Area: COP Policy and Governance

5.1.1 Objective

To establish a high-level national commitment through coordinated collaboration and partnership with all sectors whose operations border on child protection to oversee the implementation of the National COP Framework spearheaded by the CSA.

5.1.2 Measures

5.1.2.1 Leadership

CSA is mandated to promote the protection of the rights of children online. The COP division of the CSA is responsible for the the development, implementation, monitoring and evaluation of laws, policies, plans and programmes relating to COP. The COP Division will be the focal point for national, regional, and international cooperation, working closely with government agencies, national and international human rights institutions, and civil society organisations to cover children's rights in the digital environment and to receive, investigate and address complaints from children and their representatives. To achieve this, CSA will do the following:

- Lead in the roles of coordination, networking and facilitation of all strategic measures outlined in the Framework.
- Provide technical guidance and back up support to other institutions/ sector ministries to promote COP analysis and planning.
- Strengthen links between Government, Non-Governmental Organizations (NGOs), Civil Society Organizations (CSOs) and the private sector in mainstreaming COP in relevant policies, plans and frameworks.
- Establish policy review and reform structure to keep pace with current trends on COP.
- Review, map out, develop strategic partnerships around COP laws and policies across all sectors, and monitor their enforcement by the approved institutions and agencies.
- Coordinate a rigorous monitoring and evaluation system that will promote new learning around trends and concepts of COP from relevant sectors and disseminate to all for implementation.
- Strengthen partnerships with disability responsive organisations to address the special issues and concerns of Children with Disability (CWD) in Ghana.

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[8]Section 4(j) of the Cybersecurity Act, 2020 (Act 1038)

5.1.2.2 Research and Analysis

The CSA will ensure that nationally coordinated research and analysis is conducted to provide intelligence and empirical evidence on the state of child online exploitation, threats, vulnerabilities, risks, and response in the country, as well as the collection of robust, comprehensive data, disaggregated by age, sex, disability, and geographical location. Research and analysis will identify new or emerging trends and patterns of CSEA which will enable the development of effective policies, interventions and opportunities to safeguard children, and disruption opportunities to prevent offending. Intelligence and evidence-led policy and practice will ensure that activity is clearly prioritised against areas where the worst harm is being caused to children and the most significant capability gaps have been identified. In addition to the above, CSA shall:

- Engage with and elicit views of academics and scholars of universities and the research community who have a professional interest in and knowledge of the social and technical impact of the internet.
- Engage with the non-governmental organization (NGO) community for their expertise and information in providing services to children, parents, carers and educators to promote online safety.

5.1.2.3 Legislation

The digital environment can open new ways for armed groups designated as terrorists or violent extremists, to recruit and exploit children to engage with or participate in violence. The CSA shall ensure that legislation prohibits the recruitment of children by terrorists or violent extremist groups. Investigation and prosecution of cybercriminals in line with the Cybersecurity Act, 2020 (Act 1038) will be enforced across the country. The CSA in collaboration with relevant stakeholders will develop a user-friendly version of the COP provisions in the Cybersecurity Act, 2020 (Act 1038) to educate and create awareness.

The CSA shall regularly review and, where necessary, update its legal framework to support the full realisation of the rights of the child in the digital environment. The comprehensive legal framework shall address preventive measures; prohibition of all forms of violence against children in the digital environment; provision of effective remedies, recovery and reintegration; the establishment of child-sensitive counselling, reporting and complaint mechanisms; and accountability mechanisms to fight impunity.

5.2 Strategic Area: COP Criminal Justice

5.2.1 Objective

To strengthen the domestic legal and regulatory regimes and improve the capabilities of law enforcement agencies.

5.2.2 Measures

5.2.2.1 Dedicated Law Enforcement Agencies

To ensure effective investigation and prosecution of OCSEA and cybercrimes, the government has set up the Cyber-Crime Unit, as a division of the Ghana Police Service. The CSA will also train police in districts throughout the country to effectively deal with COP cases in the districts. CSA shall:

- Assist the Police develop an overall strategy to help make the Internet safer for children and young people.
- Train Officers to conduct investigations into internet related crimes against children, having the right level of technical knowledge and access to forensic facilities to extract and interpret data obtained from computers or the internet.
- Establish clear mechanisms to enable reporting of COP incidents or concerns.

- Channel hotlines from other agencies to CSA Point of Contact as a collation point of all COP cases.
- Ensure international cooperation between law enforcement agencies around the world and Interpol.
- Invest in training for law enforcement, prosecutorial and judicial authorities in the methods used by online criminals to perpetrate crimes.
- Invest in acquiring and maintaining forensic facilities in the regions of Ghana to obtain and interpret forensics evidence from digital devices.

5.2.2.2 Prosecutors and Judiciary

The CSA shall address the ways in which the use of digital technologies may facilitate or impede the investigation and prosecution of crimes against children and take all available preventive, enforcement, and remedial measures. The CSA, through international cooperation shall ensure that the judiciary and prosecutors are given relevant training to build their capacity to effectively handle COP cases.

5.2.2.3 Establish 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. A system to manage and rehabilitate child sex offenders will be developed to limit their ability to cause further harm to children. This will give authorities a transparent and consistent framework through which they can manage the risk posed by child sex offenders in the community. To ensure the best interest of school going child offenders are considered, CSA together with stakeholders may consider non-prosecutorial measures in penalising them.

5.2.2.4 Access to Image and Biometric Database

Ghana will establish a national database of offenders created and linked to INTERPOL's International Child Sexual Exploitation (ICSE) database to improve the efficiency and effectiveness of law enforcement agencies in identifying offenders. The COP institutional stakeholders would work towards building a robust repository system of child abuse images, biometrics and cases. This enhances the ability of law enforcement and other appropriate organisations to monitor offenders' activities effectively and share information efficiently and securely.

5.2.2.5 Implementation of Data Protection and Digital Rights for Children

The CSA in collaboration with the Data Protection Commission (DPC) shall ensure that data protection legislation respects children's privacy and personal data in relation to the digital environment. Where consent is sought to process a child's data, CSA shall ensure that consent is informed and freely given by the child or, depending on the child's age and evolving capacity, by the parent or caregiver, and obtained prior to the processing the data. Where a child's own consent is considered insufficient and parental consent is required to process a child's personal data, the CSA shall require that organizations processing such data verify that consent is informed, meaningful and given by the child's parent or caregiver.

The CSA shall consider that risks may be enabled through the design and use of digital technologies, for example, by revealing the location of a child to a potential abuser. In recognition of those risks, the CSA shall require an approach integrating safety-by-design and privacy-by-design and ensure that parents and caregivers are fully aware of the risks and available strategies to support and protect children.

5.3 Strategic Area: COP Victim Support Service and Empowerment

5.3.1 Objective

To establish a coordinated multi-stakeholder framework for children to have access to services that support victims' thorough investigation and prosecution of cybercrime.

5.3.2 Measures

5.3.2.1 End to End Support

The CSA will engage professionals who are trained and experienced in supporting child online abuse victims to put in place a fully integrated and planned end-to-end system to support victims through investigation, legal proceedings, and beyond. In many instances, acts of violence against children are committed by other children. In such situations, restorative approaches will be pursued to repair the harm done, while preventing the criminalisation of children.

5.3.2.2 Child Protection Workforce

The CSA will collaborate with relevant stakeholders to establish a Child Protection Workforce to support and cater for children during investigation and prosecution of cases. The CSA will ensure that the Ghana Police Service (GPS), Ghana Education Service (GES), Children's Department, Department of Social Welfare, CSOs, and other relevant institutions are given specialised training in COP to provide coordinated victim support. Organisations training practitioners in 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 trauma care and psycho-social support for victims, and escalate reports of online crimes to the relevant authorities. Procedures will be put in place to ensure victims can access support services through the Integrated Social Services (ISS). CSA shall ensure that universal and systematic child protection mechanisms are in place that require all those working with children (social welfare, health, schools etc.) to identify, respond and report incidents of abuse and harm that occur online.

5.3.2.3 Compensation, Remedies, and Complaints Arrangements

The CSA shall ensure that appropriate and effective remedial judicial and nonjudicial mechanisms for the violations of children's rights relating to the digital environment are widely known and readily available to all children and their representatives. Services will consider gender, age, level of maturity and the rights and needs of the child, avoiding unnecessary procedures and interviews, to prevent further trauma and to promote the physical and psychological recovery and social reintegration of victims. Appropriate reparation includes restitution, compensation, apology, correction, removal of unlawful content, access to psychological recovery services or other measures.

5.4 Strategic Area: COP Societal

5.4.1 Objective
To ensure that children are informed of COP whiles parents, educators, and childcare professionals are equipped to keep children safe.

5.4.2 Measures

5.4.2.1 Child Online Protection (COP) Hotline
The Government through the CSA is to ensure that the COP hotline and all the helpline services created are linked to the law enforcement and child protection agencies to facilitate an efficient and effective response to COP offenses reported by the public.

5.4.2.2 Education Programmes

The CSA shall ensure that pre-service and in-service training relating to the digital environment is provided for professionals working at all levels of education, to support the development of their knowledge, skills and practice. An online portal will be developed to provide easy access to advice, support and resources categorised by age, for practitioners working with children, the children themselves and the wider public.

The CSA shall ensure that parents and caregivers have opportunities to gain digital literacy, to learn how technology can support the rights of children and to recognise a child who is a victim of online harm and respond appropriately. Special attention shall be paid to the parents and caregivers of children in disadvantaged or vulnerable situations. CSA shall:

- Educate children on age-appropriate digital literacy to benefit from technology, free from harm.
- Allow children to develop critical thinking skills that will help them to identify and understand the good and bad sides of their behaviour in the digital space.
- Provide social and emotional learning concepts within online safety education to support students' understanding and management of emotions to have healthy and respectful relationships, both online and offline.
- Introduce digital literacy in the school curriculums.
- Train educators, parents, and caregivers to have suitable knowledge and skills to resolve child online protection related issues.

5.4.2.3 Child Participation

According to the UNCRC, children have the right to comment or give recommendations on government policies related to children. Ethical and effective participation of young people include, increased buy-in from children and young people which enhances the credibility of services and decision-making; new suggestions for innovation and reform based on the experience of services users and a built-in process of feedback that can contribute to service improvement on an ongoing basis.

5.5 Strategic Area: COP Industry

5.5.1 Objective

To facilitate industry engagement in developing solutions to prevent and tackle OCSEA to enable the public to proactively report OCSEA offenses.

5.5.2 Measures

5.5.2.1 Notice and Take-down Procedures

The CSA will ensure that the hotline and all the helpline services created are linked to the industry to facilitate expedited response in situations that may require the service of the industry to block or remove OCSEA content. The CSA will collaborate with the Internet Watch Foundation (IWF) and INHOPE to takedown OCSEA content.

5.5.2.2 Online Child Abuse Reporting

There is statutory protection in place to allow industry players to report OCSEA fully and effectively, including the transmission of content to law enforcement agencies. Industry players are to put in place processes and allocate resources with COP-trained staff to enable the timely identification and reporting of online child abuse incidents to the CSA. Below are some measures.

- Mechanism to identify, block and remove abuse of children online, taking all services relevant to their organisations.
- Mechanisms for reporting abuse of an online service or for reporting objectionable or illegal behaviour online, for example to a national hotline, should be widely advertised and promoted both on the Internet and in other media.
- Links to report abuse mechanisms should be prominently displayed on relevant parts of any website that allows user generated content to appear.

5.5.2.3 Innovative Technological Solutions

Industry players are to develop innovative technological solutions while promoting safety by design and providing content filters to enhance existing approaches to prevent and tackle OCSEA. The CSA will engage with industries to establish standards and codes of practice 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 (IoT), connected toys and services with a streaming function. In addition, industry players are to share their knowledge and skillset with other related stakeholders to enhance collective efforts in reducing OCSEA issues. Products and services that are offered may be certified, and action may be taken against purveyors of products and services that are harmful to children.

The CSA shall take measures, including the development, monitoring, implementation and evaluation of legislation, regulations, and policies, to ensure compliance by businesses with their obligations to prevent their networks or online services from being used in ways that cause or contribute to violations or abuses of children's rights, including their rights to privacy and protection, and to provide children, parents and caregivers with prompt and effective remedies.

5.5.2.4 Commercial Advertising and Marketing

The digital environment includes businesses that rely financially on processing personal data to target revenue-generation or paid-for content, and such processes intentionally and unintentionally affect the digital experiences of children. This Framework shall ensure the best interests of the child is a primary consideration when regulating advertising and marketing addressed to and accessible to children. Sponsorship, product placement and all other forms of commercially driven content should be clearly distinguished from all other content and should not perpetuate gender or racial stereotypes.

This Framework shall prohibit by law the profiling or targeting of children of any age for commercial purposes based on a digital record of their actual or inferred characteristics, including group or collective data, targeting by association or affinity profiling. Practices that rely on neuromarketing, emotional analytics, immersive advertising and advertising in virtual and augmented reality environments to promote products, applications and services shall also be prohibited from engagement directly or indirectly with children.

5.5.2.5 Corporate Social Responsibility

Industry players are to incorporate child online safety into appropriate corporate policies, procedures, and processes to ensure adequate measures are put in place to identify, prevent, and mitigate OCSEA. Businesses will be required to show what procedures and special considerations they have undertaken to ensure child safety and respect for children's rights as they provide online services in Ghana. The CSA shall also encourage businesses to promote public information and accessible and timely advisories to support children's safe and beneficial digital activities.

5.6 Strategic Area: COP Media and Communication

5.6.1 Objective

To leverage the media and communications capabilities to raise awareness among the public, professionals, children, and policymakers and deter offenders to reduce OCSEA incidents.

5.6.2 Measures

5.6.2.1 Ethical and Informed Media Reporting

The CSA in collaboration with child protection partners shall educate the media in ensuring ethical, informed, and balanced reporting of OCSEA with the victim's dignity and rights always respected to prevent stigmatisation. Professional codes of conduct set by news media and other relevant organisations should include guidance on how to report digital risks and opportunities relating to children. Such guidance should result in evidence-based reporting that does not reveal the identity of children who are victims and survivors.

5.6.2.2 Universal Terminology

To avoid inconsistent use of OCSEA terminologies which can lead to differing responses, legislation interpretation, and understanding of online abuse issues, there will be the adoption of universally agreed terminology relating to OCSEA to enable information and ideas to be communicated rapidly and legibly amongst all stakeholders.

5.7 Strategic Area: Special Protection Measures

5.7.1 Objective

To ensure that COP issues that are not specifically addressed in the WeProtect Global Alliance MNR are addressed in the Framework.

5.7.2 Measures

5.7.2.1 Children with Disabilities

Children with different types of disabilities, including physical, intellectual, psychosocial, auditory and visual disabilities, face different barriers in accessing the digital environment, such as content in non-accessible formats, limited access to affordable assistive technologies at home, school and in the community and the prohibition of the use of digital devices in schools, health facilities and other environments. CSA shall ensure that children with disabilities have access to content in accessible formats and remove policies that have a discriminatory impact on such children. CSA shall provide awareness-raising campaigns, training and resources for children with disabilities, their families and staff in educational and other relevant settings so that they have sufficient knowledge and skills to use digital technologies effectively.

5.7.2.2 Online Facilitated Child Trafficking

Considering Government's obligations to investigate, prosecute and punish trafficking of persons, including its component actions and related conduct, the CSA shall support relevant state institutions to create awareness and update anti-trafficking legislation to prohibit online-facilitated recruitment of children by criminal groups.

5.7.2.3 Extremism and Other Cyber Offences Related to Children

The CSA shall ensure that appropriate legislation is in place to protect children from crimes that occur in the digital environment, hate speech, identity theft, internet influenced suicide, terrorism and to ensure that crimes in the digital environment are investigated and prosecuted. The CSA shall also require a high standard of cybersecurity, privacy-by-design and safety-by-design in the digital services and products that children use, to minimise the risk of such crimes.

5.7.2.4 Online Games

Online gaming enables children to fulfil their fundamental right to play, make friends online and develop new skills, however, abundance of evidence indicates that left unmonitored and unsupported by a responsible adult, online gaming platforms can pose risks to children, from gaming disorders, financial risks, collection and monetization of children's personal data, to cyberbullying, hate speech, violence, and exposure to inappropriate conduct or content, and grooming using real, computer generated or even virtual reality images and videos depicting and normalizing the sexual abuse and exploitation of children.

Parents, guardians and educators who spend the most time with children should be educated in digital literacy to understand the online environment and be able to protect children and teach them how to protect themselves. The CSA will provide guidance to parents, teachers and caregivers on parental guidance and age-appropriate information on online games. In addressing the compulsive and excessive use of the internet, self-generated sexual content and other internet disorders:

- Schools shall reach out to parents and guardians through PTA meetings to create awareness of the risks and the many positive possibilities which new technologies present.
- Parents and carers shall be consulted to obtain their consent from ISPs and ESPs when children are downloading apps, accessing sites and making online purchases.
- Parents and caregivers shall be trained to use device settings, technical tools (such as filtering programmes) and child protection apps and settings that can help.
- Parents and caregivers shall be trained to use services to screen out unwanted material or block unwanted contacts and use mechanisms to manage their children's devices, allocating time, apps and services and manage online purchases.
- Train teachers, parents and caregivers to recognise the signs of abuse and harm of children and to report same.

6.0 Implementation Matrix

The following constitutes Strategy & Action Plan that Ghana seeks to implement towards achieving these themes. Timelines and responsibilities are presented for the strategies and actions. Timeframes are defined as Short-term (0-1 year), Medium-term (2-3 years), and Long-term (3-5 years).

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
1.	Policy and Governance	Leadership	The COP Division of the CSA will play a coordinating role while working closely with relevant MMDAs including non-governmental organisations, industry players and relevant stakeholders. Multi-sectorial approach to engage, document, disseminate and evaluate COP programmes while enforcing cybersecurity regulations on COP. International Relations on sub-regional, regional and international bodies mandated to work in COP. Engage with children, parents/ caregivers, educators and industry players on COP.	Database of NGOs and all institutions working on COP. Receive annual reports from all relevant stakeholders. Provide direction and focus areas on COP. Provide guidelines for training, child offender support, victim support, prosecution and other related COP matters. Regularly engage relevant actors in the ecosystem of online risks and harms to prevent children from being exposed to risks. Develop common metrics to measure child online safety.	CSA CSOs MDAs Non-Governmental Organisations International partners	Short term
		Research, Analysis and Monitoring & Evaluation	The CSA will conduct research on its own and in collaboration with research institutions and experts to ensure the availability of current and reliable data to inform policies and programmes to address COP issues. Align the implementation plan with other broader child protection- related programmes.	Engage with the Ghana Statistical Service (GSS) and other government agencies to include the collection and documentation of sex-disaggregated data on COP in Ghana. Conduct periodic surveys, research and situational analysis with relevant stakeholders on cybercrime and cybersecurity issues related to children and young people.	CSA Research Institutions CSO's Academia Ghana Statistical Service, MDAs Non-Governmental Organisations International Partners	Short – Medium term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
			Integrate COP Indicators into existing National Surveys (Multiple Indicator Cluster Survey (MICS), Demographic and Health Surveys (DHS) Ghana Living Standard Survey (GLSS). Capacity building for COP staff on Research, Analysis and Monitoring & Evaluation of COP Programmes.	Develop a Monitoring & Evaluation framework to measure the outcome of the COP research implementation. Collect data during routine activities e.g., sensitisation/ awareness creation sessions, reports and complaints sent via the COP PoCs, CID and other service providers. Comparative analysis of data from relevant international and global studies to access progress of work. Disseminate widely research findings on COP to inform policy formulations and programming.	CSA Research Institutions CSO's Academia Ghana Statistical Service, MDAs Non-Governmental Organisations International Partners	Short – Medium term
		Legislation	The CSA in consultation with relevant ministries and stakeholders will facilitate the continuous review of existing legislation, implement research recommendations and the enactment of new laws where necessary.	Review relevant laws and recommend amendment when required. Contribute towards the development of the COP provisions for the Regulations to Act 1038. Amend laws to fill any gaps in the existing laws.	CSA Office of Attorney-General CSA Board Non-Governmental Organisations Development Partners MDAs	Short – Medium term
2.	Criminal Justice	**Dedicated Law Enforcement**	Strengthen specialized units within the Ghana Police Service and the CSA with the necessary expertise, skills, processes, and tools to conduct and coordinate OCSEA investigations and collaborate with international law enforcement to move investigations forward across borders.	Support the training of the law enforcement agencies particularly the Cyber Crime Unit of the Ghana Police Service on digital forensics and other techniques to aid in the prosecution of COP cybercriminals.	CSA DOVVSU CID	Short – Medium term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
			Build capacity of other law enforcement officers to address COP cases in the districts and regions.	Support the training of the law enforcement agencies particularly the Cyber Crime Unit of the Ghana Police Service on digital forensics and other techniques to aid in the prosecution of COP cybercriminals. Support collaboration between the Ghana Police and the CSA. Provide in-service training for investigators and prosecutors of different police stations. Establish National Center for Missing and Exploited Children (NCMEC) database within the CSA. Facilitate the inclusion of Child Online Protection course in law enforcement training curriculum. Establish cybercrime desk in all regional police offices with an investigator to manage the unit.	CSA DOVVSU CID	Short – Medium term
		Judiciary and Prosecutors	Build the capacity of judges, prosecutors, and other relevant staff in COP by ensuring child-friendly court processes that address the needs of child victims using more age-appropriate procedures and tools. Capacity Building for COP staff in forensics investigation, electronic evidence, monitoring and evaluation of the work of the Judiciary and Prosecutors of COP cases.	Train the judiciary and prosecutors to gain in-depth knowledge and understanding of COP and electronic evidence to ensure justice for victims. Ensure that child friendly courts are used when prosecuting COP cases.	CSA Office of Attorney-General Judicial Service The Ghana Police Service MDAs	Short term
		Offender Management Process	Have effective measures in place to ensure supervision of child when in custody.	Develop a database of COP convicted offenders. Research into trends for offending and re-offending.	CSA Ghana Psychological Council	Medium term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
			Develop systems in place for the management of child offenders and provide alternate ways of prosecution and sentencing. Capacity building for COP Staff of CSA in Offender Management.	Explore non-prosecutorial punishment for child offenders. Develop rehabilitation mechanisms for child victims. Develop strategies to reduce the demand for CSAM.	Ghana Prisons Service Ghana Police Service Judicial Service	Medium term
		Access to Image and Biometric Database	The CSA will engage with stakeholders to develop, maintain and update the Database. Develop capacity building workshops for COP staff on the database management.	Develop and implement the national database of COP offenders and its integration into the International Child Sexual Exploitation (ICSE) sites.	CSA INTERPOL CID	Long term
3.	Victim Support and Empowerment	**End to End Support**	Develop age-appropriate procedures, systems and services to prevent further trauma, promote the physical and psychological recovery and social reintegration of victims. Capacity building for COP staff of CSA to identify COP victims and survivors, roll out innovative interventions of rehabilitation and reintegration. The health care service for COP victim shall be covered by the National Health Insurance Scheme shall include children's mental health and wellbeing. Health care institutions shall carry out mandatory reporting of abuse. Train health care professionals to be suitably equipped and knowledgeable to detect child online abuse.	Develop procedures, guidelines, and measures required for effective end-to-end child support in a Victim Support Framework including wrap around and restorative services. Develop a database of organisations and government agencies to provide victim support for children. Clean devices of victims of spyware and other harmful apps at CSA. Develop, coordinate, and regularly monitor and evaluate victim support frameworks. Facilitate inter sectoral dialogues and actions on the promotion of legal aid and services for COP. Strengthen and equip agencies to effectively address violence against children and child online abuse. Engage with National Health Insurance Authority to provide coverage for child victims in need of medical care.	CSA ISS members DOVVSU Ghana Police Service Ghana Health Service CSO's MDAs Non-Governmental Organisations Development Partners Faith Based Organisations Ghana Education Service National Health Insurance Authority	Medium term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
		Child Protection Workforce	Develop modules on COP and integrate into existing curriculum and manuals for training identified institutions that render child protection related services to children e.g., the Police, Judiciary, Social Welfare, NGOs, GES, Media etc. Include sessions on COP into the routine in-service training programmes for CSA staff, Ghana Police Service, Ghana Education Service (GES), Department of Children, Department of Social Welfare, CSOs and other relevant institutions. Invest in appropriate training for professionals working within social services to provide online and offline support.	Organise COP training for the CSA staff, Ghana Police Service, Ghana Education Service (GES), Department of Children, Department of Social Welfare, CSOs and other relevant institutions. Follow up on training and education impacted to determine effective use of the knowledge acquired. Develop guidelines for service providers for COP. Build capacity of the various counselling units in schools on child online protection.	CSA CSOs MDAs Non-Governmental Organisations International Partners Parents and guardians Commission on Human Rights and Administrative Justice (CHRAJ)	Short term
		Compensation, Remedies and Complaints Arrangements	Collaboration with stakeholders to establish modalities needed to facilitate compensation, remedies, and complaints arrangements. Build capacity of COP staff of the CSA on Compensation, Remedies and Complaints Arrangement to develop systems and procedures on them.	Provide parents and children with child-sensitive and age-appropriate information in child-friendly language on their rights and on the reporting and complaint mechanisms, services and remedies available to children. Develop compensation packages and remedies in Prosecution Framework.	CSA CSOs MDAs Non-Governmental Organisations Development Partners Judicial Service	Medium
4.	Societal	**Child Online Protection (COP) Hotline**	Continuous stakeholder engagements on how to provide rapid response to victims. Capacity building on effective handling and management of hotline by COP Staff of the CSA.	Establish a point of contact to facilitate the reporting of COP related issues. Develop guidelines on referral system and interventions.	CSA CSOs Ministries Government Agencies Non-Governmental Organizations International Partners	Long term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
		Education Programmes	Identify key stakeholders to develop COP digital literacy materials. Integrate COP awareness creation programmes into existing campaigns e.g., Ghanaians Against Child Abuse (GACA) and Safe Schools Programme including developing a digital literacy package for pre-tertiary schools that would be aligned with the school curriculum. Collaborate with GES on how to incorporate cybersecurity in the pre-tertiary school curricula.	Develop age-appropriate educational materials for COP awareness creation. Collaborate with relevant stakeholders to develop digital literacy materials for primary, Junior High Schools (JHS) and Senior High Schools (SHS). Organise national, regional and district cybercrime/ cybersecurity sensitization and awareness campaigns. Organise COP quiz competitions for senior high school children. Train parents/guardians and educators on cyber hygiene. Organise Parents Forum Develop fun and educative awareness creation programmes.	CSA CSOs Ministries Government Agencies Development Partners Faith Based Organisations Parents, Guardians, Caregivers and Educators. PTAs	Medium term
		Child Participation	Involve children in national, regional and district stakeholder consultations. Identify relevant children and youth groups to solicit their views/inputs. Have enhanced engagements with children on the responsible use of the internet.	Invite selected groups of children to participate in COP fora, workshops, and meetings. Develop a child friendly version of the COP Framework to facilitate understanding for young people.	CSA GES CSOs	Short term
5.	Industry	Notice and Take-down Procedures	Develop guidelines for notice, take-down, blocking and removal of child abuse materials. Develop capacity building workshops for COP staff on notice and take-down procedures.	Develop partnership with industry players, procedures and processes with timelines on notice, take-down, blocking and removal of child abuse material.	CSA ISPs Industry Players MDAs Non-Governmental Organisations Development Partners	Short term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
		Online Child Sexual Exploitation and Abuse (OCSEA) Reporting	Develop procedures and guidelines for reporting OCSEA cases. Provide reporting mechanisms to report issues and concerns whilst providing timely responses to reports with information about actions taken.	Develop and publish reporting process and procedures. Develop a mechanism to provide readily understood means for reporting illegal content found on the Internet. Display links to report abuse prominently on relevant parts of any web site that allows user generated content to appear. Develop national processes to ensure all CSAM found in Ghana are channelled to a centralised, national resource that has legislative powers to direct companies to remove content.	CSA Office of Attorney General MDAs Non-Governmental Organisations International Partners	Short term
		Innovative Solution Development	Develop innovative ways of tackling OCSEA and CAM. National and international industry players shall work to raise awareness of the issues around child online safety. Industry shall adopt a safety by design approach to products, services and platforms, recognising safety as a core objective. Capacity building for COP Team on technical systems.	Encourage businesses to provide innovative ways to protect children online. Develop digital and innovative solutions to ensure efficient information and statistics gathering. Organise COP innovation workshops and review meetings to share best practices. Develop a database of innovators to filter content. Provide age-appropriate family friendly tools to protect children online. Provide proactive ways to detect, block and report abuse. Invest in relevant tools to prevent platforms being exploited. Ensure parents and carers are consulted to obtain their consent when children are downloading apps, accessing sites and making online purchases.	CSA Industry Players CSOs MDAs Development Partners	Short term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
		Corporate Social Responsibility (CSR)	Strengthen CSAs relationship with corporate organisations and industry players to include COP in their CSR. Build capacity of COP staff on CSR and innovative ways in getting industry players in supporting COP.	Ensure a legal regime that backs CSR in COP. Identify and map out companies who will undertake CSR. Assist companies to develop COP programmes based on priority areas. Incentivise companies who undertake CSR in the area of cybersecurity. Organise stakeholders meeting. Extend CSR to content and app developers.	CSA Industry Players Private Sector App Developers Content Developers	Short - Medium term
6.	Media and Communica-tions	**Ethical and Informed Media Reporting**	Capacity building programme for the media including editors, bloggers, heads of programmes, community information centres and reporters. Compile a database of media personnel to disseminate communication materials, information and other COP related information. Capacity Building on ethical and informed media reporting for COP Team.	Organise training workshops and COP awareness programme for media houses and social media influencers. Have periodic media sessions or statements on trends and progress made. Ensure Quality Assurance of COP information in the media. Create COP ambassadors among media houses, social media influencers and celebrities to promote awareness on COP. Periodic reports to name and shame reporters responsible for unethical reporting of COP related incidents An annual award for best COP reporter to be instituted.	CSA National Media Commission The Media Media CSOs Bloggers Community Information Centres Social Media influencers Ghana Journalists Association	Short term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
		Universal Terminology	Review of documents on universally agreed COP terminology and develop glossary for key terminologies. Build Capacity of COP Team on developing terminology to suit the Ghanaian context.	Compile definitions of key terminologies. Localization of content to reflect our setting and culture with collaborations with linguistics expert, and institute of languages. Periodically review terminologies to reflect local trends. Develop local names for terminologies in different Ghanaian languages.	CSA CSOs MDAs Non-Governmental Organisations Development Partners Linguistics Department of University of Ghana	Medium term
7.	Special Protection Measures	**Children with Disabilities (CWD)**	Ensure that children with disabilities have access to content in accessible formats. Remove policies that have a discriminatory impact on children with disabilities. Capacity building of COP staff of CSA to understand threats, vulnerabilities, and threats online for children with disabilities and how to address them effectively.	Conduct awareness-raising campaigns for CWD. Develop training tools and resources for CWD. Review and promote laws that protect children with disabilities online. Develop reporting channels for CWD.	CSA Department of Children, MOGSCP, CWD CSOs MMDAs MDAs	Short - Medium term
		Online-Facilitated Child Trafficking	Create awareness and update on anti-trafficking legislation to prohibit online-facilitated recruitment of children. Capacity building of COP staff of CSA to learn trends and ways to combat online-facilitated child trafficking	Engage with relevant stakeholders to review legislation on collaborating on online-facilitated child trafficking. Sensitisation programmes and advisories developed on online facilitated child trafficking. Map out and monitor current trends in human trafficking in Ghana.	CSA Anti-trafficking CSOs MoGSCP Ghana Police Service Industry players Ghana Immigration Service MDAs MMDAs	Long term

S/N	Theme	Capabilities	Strategies	Action	Stakeholders	Time Frame
		Extremism and Other Cyber Offences	Ensure appropriate legislation is passed to protect children from extremist offenses and crimes in the digital environment. Capacity Building for COP Team of CSA on online extremism targeted at children.	Hold consultative meetings with relevant stakeholders. Conduct survey on extreme behaviour among young persons. Attend capacity building programmes. Develop capacity building programmes for relevant stakeholders	CSA Anti-Terrorism Organisations CSOs Industry Players Development Partners MMDAs MDAs	Short - Medium term
		Online Games	Provide guidance to parents, teachers and caregivers on parental guidance and age-appropriate information on online games. Capacity Building on Online Games for COP team of the CSA.	Develop age-appropriate guidelines for online games. Hold consultative meetings with relevant stakeholders. Make presentations at PTA meetings to create awareness of the risks and the many positive possibilities which new technologies present. Organise Digital Parents Forum. Parents and caregivers shall be trained to use device settings, technical tools (such as filtering programmes) and child protection apps and settings that can help. Train teachers, parents and caregivers to recognise the signs of abuse and harm of children and to report same. Ensure that online safety materials are made available in either written form or produced using other media and in local languages to be more inclusive.	CSA Industry players Software Developers Parents/ Caregivers, Educators, Children MDAs	Short - Medium term

7.0 Monitoring & Evaluation

Against specific indicators per the thematic areas within the COP framework. Key indicators would be selected for the thematic areas and set forth in biennial operational plans to be developed. The NCSC/CSA together with key stakeholders will then establish appropriate milestones and targets for each of the indicators. Continuous monitoring of the indicators will occur under the leadership of the NCSC/CSA.

In addition, a review of the COP Framework will occur every five years to examine progress made and assess whether the strategies are still relevant.

In practice, the M&E strategy shall involve:

➜ Annual updates (from institutions or organizations identified and playing specific roles).

➜ Mid-year review Learning and Sharing Meeting of COP Stakeholders.

➜ Annual Planning and Reflection Meeting of the Stakeholders within the COP ecosystem.

8.0 Conclusion: Child Online Protection Beyond 2025

The Framework acknowledges that protecting children and young people from OCSEA is paramount to child online safety and plays a key role in encouraging the participation, and promotion of digital literacy among children and young people. The strategies and their respective actions point outlined in the document are to address Ghana's unique challenges pertaining to OCSEA and other forms of online abuse in the next five years. Within the timeframe stipulated, the Government of Ghana will commit to invest and allocate resources based on specific national needs in priority and strategic areas of the Child Online Protection initiative.

The Framework feeds into the mission and vision of the National Cybersecurity Policy and Strategy and the object of the Cybersecurity Act, 2020 (Act 1038) in the fulfilment of the protection and safety of children and young people in cyberspace. While some of the strategies are completely achievable within the timeframes allocated, given the allocation of right resources, the formulation and implementation of other strategies is likely to go beyond 2025.

9.0 Acknowledgement

The development of this document will not have been possible without the commitment and collaboration of a number of key stakeholders. Appreciation goes to the Sector Minister, Hon. Ursula Owusu-Ekuful, for her exceptional leadership in championing Ghana's cybersecurity development particularly her dedication to the child online protection course. Our gratitude to first Steering Committee members inaugurated by the then Ministry of Communications for the initial work done and providing a direction and foundation on which this current document was developed.

The Ministry of Communications and Digitalisation also expresses its appreciation to UNICEF for their valuable contributions, support, and commitment to the country's child online protection course through partnership on the development and implementation of initiatives and programmes covering child online protection in addition to the development of the COP Framework document. The Ministry is also grateful to Ghana's cybersecurity development partners on child online protection including the International Telecommunications Union, the WeProtect Global Alliance, the Internet Watch Foundation, and Council of Europe, for their support and valuable contributions.

Ghana's domestic stakeholders involving governmental and non-governmental stakeholders continue to play critical roles in the development of national interventions to mitigate cybercrime and cybersecurity. The Ministry of Gender, Children and Social Protection, Ministry of Education, Ghana Education Service, National Commission for Civic Education, Parents and Teachers Associations, constituting the governmental actors are appreciated for their contribution to the development of this document with their varying perspective from their respective fields that are majorly children centric. A number of non-governmental stakeholders comprising representatives from industry, academia, professional associations, and civil society groups contributed to the review of the document particularly Child Online Africa. The Ministry is indebted to all these institutions for their continuous commitment towards improving Ghana's cybersecurity readiness.

The Ministry of Communications and Digitalisation expresses its appreciation to all the staff of the Cyber Security Authority for leading the development of this important production towards the protection of children online for a secure and resilient digital Ghana. Finally, the Ministry is grateful to the Ghanaian public for their keen interest and contributions towards the development of a National Child Online Protection (COP) Framework which seeks to guide child online protection matters for the next five years.

Annex 1: Acronyms

Table 2: Table of Abbreviations and Description

Abbreviation	Description
ACERWC	African Committee of Experts on the Rights and Welfare of the Child
AU	African Union
BOG	Bank of Ghana
CAM	Child Abuse Materials
CHRAJ	Commission on Human Rights and Administrative Justice
CID	Criminal Investigations Department
COP	Child Online Protection
CSOs	Civil Society Organisations
CSA	Cyber Security Authority
CSAE	Child Sexual Abuse Exploitation
CSAM	Child Sexual Abuse Material
CWD	Children with Disabilities
DOVVSU	Domestic Violence and Victims Support Unit
DPC	Data Protection Commission
EOCO	Economic and Organised Crime Office
ECOWAS	Economic Community of West African States
GACA	Ghanaians Against Child Abuse.
GCA	Global Cybersecurity Agenda
GES	Ghana Education Service
GoG	Government of Ghana
GPS	Ghana Police Service
ICT	Information Communication Technology
ICT4AD	Information Communications Technology for Accelerated Development
ITU	International Telecommunication Union
IWF	Internet Watch Foundation
ICMEC	International Centre for Missing and Exploited Children
INTERPOL	International Criminal Police Organisation
MDAs	Ministries, Departments and Agencies
MMDAs	Metropolitan, Municipal and District Assemblies
MNR	Model National Response
MoE	Ministry of Education

Abbreviation	Description
MoGCSP	Ministry of Gender, Children and Social Protection
MoJAGD	Office of the Attorney-General and Ministry of Justice
NCA	National Communications Authority
NCCE	National Commission for Civic Education
NCSAP	National Cyber Security Awareness Programme
NCSC	National Cyber Security Centre
NCSIAC	National Cyber Security Inter-Ministerial Advisory Council
NCSTWG	National Cyber Security Technical Working Group
NSCS	National Security Council Secretariat
NSB	National Signal Bureau
NGOs	Non-Governmental Organisations
NYA	National Youth Authority
SDGs	Sustainable Development Goals
Telco's	Telecommunication Sector
UNCRC	United Nations Convention on the Rights of the Child
UNICEF	United Nations Children's Fund
WSIS	World Summit on the Information Society

Annex 2: Glossary

Child is any person under the age of eighteen (18).

Child sexual abuse also takes on an online dimension when, for instance, acts of sexual abuse are photographed or video-/audio-recorded and then uploaded and made available online, whether for personal use or for sharing with others. Each repeated viewing and/or sharing of such recorded material constitutes a new violation of the rights of the child.

Child sexual abuse material consists of a recording, usually in still or video form, which depicts a child engaged in explicit sexual activity.

Child abuse material refers to material which depicts or describes, such that any reasonable person would regard as being offensive or inappropriate for the consumption of children:

CHILD ABUSE IMAGES: images of children reflecting abuse – sometimes incorrectly referred to as child pornography.
Child Cyber enticement means conduct, or an attempt or conspiracy to commit such behaviour, constituting criminal sexual abuse of a minor, sexual exploitation of a minor, abusive sexual contact of a minor, sexually explicit conduct with a minor, or any similar offence under the law of Ghana.

Cyber Grooming refers to a series of acts that facilitate cyber-enticement such as actions deliberately undertaken to befriend and establish an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity with the child.

Cyber-harassment commonly refers to the intimidation, repeated or otherwise, of one individual by another or by a group, perpetrated through or utilising electronic means.

CYBER-STALKING: refers to the use of information and communication technology, particularly the internet to track, lure or harass an individual, group of individuals or organisation.

Cyberbullying refers to any harassment that occurs via the internet, cell phones or other devices to tease, harass, threaten, intimidate, and spread rumours or defamatory message on a child, with the specific intent to disgrace, embarrass, cause harm, or intimidate the person, especially with the intention to hurt or offend the victim.
Harmful online content is a broad category of content that includes any online material that can influence children negatively.

INAPPROPRIATE ONLINE CONTENT FOR CHILDREN: This refers to any online content that can impact negatively on the morality of children.

Online Sexual Abuse can be any form of sexual abuse of children which has a link to the online environment. Thus, online sexual abuse can take the form of, for instance, sexual molestation and/or harassment through social media or other online channels.

Solicitation of children for sexual purposes refers to an intentional proposal, through information and communication technologies, by an adult, to meet a child who has not reached the age of 18, to commit sexual abuse or produce child pornography where this proposal has leads to a meeting.

Safety-by-design focuses on identifying and preventing potential safety risks in the development of products and systems. It ensures safety in product and system development from the onset.

Privacy-by-design is a method of planning and implementing a system and architecture that fully supports individual rights and protects people's data whiles safety by design is applying safety principles to platforms, it requires that products are designed in the best interest of their users, setting safety and security defaults to the strongest option with transparency and control.