Comments of

The Center for AI and Digital Policy

to the

Eastern Republic of Uruguay

in response to the

Public consultation and multi-stakeholder participation on girls, boys and adolescents, digital environments and artificial intelligence

The Center for AI and Digital Policy (CAIDP) welcomes the opportunity to respond to Eastern Republic of Uruguay's request for comments on the Public consultation and multi-stakeholder participation on girls, boys and adolescents, digital environments and artificial intelligence.[1] CAIDP commends Uruguay for strengthening coordination between institutions and guiding possible public actions for the rights protection of girls, boys and adolescents in the digital environment. Uruguay has ratified the Convention on the Rights of the Child (CRC).[2] CAIDP recommends grounding this approach in the CRC and its Optional Protocols, together with the UNESCO Recommendation on the Ethics of Artificial Intelligence, the OECD AI Principles, and the Universal Guidelines for AI.[3]

CAIDP Recommendations

1. Prohibit manipulative, addictive, exploitative, and abusive AI practices.
2. Protect minors' data, communications, privacy, and autonomy.
3. Establish oversight, remedies, literacy, and participation.

[1] Eastern Republic of Uruguay, Public consultation and multi-stakeholder participation on girls, boys and adolescents, digital environments and artificial intelligence (23 Jun. 2026), https://plataformaparticipacionciudadana.gub.uy/processes/participacion-ninos-ninas-adolescentes-entornos-digitales

[2] United Nations Treaty Collection, *Convention on the Rights of the Child* (20 Nov. 1989), ch. IV.11, Uruguay ratified 20 Nov. 1990, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11&chapter=4&clang=_en

[3] UNESCO, *Recommendation on the Ethics of Artificial Intelligence* (23 Nov. 2021), https://unesdoc.unesco.org/ark:/48223/pf0000381137; OECD, *Recommendation of the Council on Artificial Intelligence* (22 May 2019, as amended), https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0449; The Public Voice, *Universal Guidelines for Artificial Intelligence* (2018), https://www.caidp.org/universal-guidelines-for-ai/.

About CAIDP

CAIDP is the largest independent nonprofit AI policy research and education organization, with a global footprint across 130 countries and a network of more than 2,000 experts.[4] CAIDP's mission is to ensure that AI and digital policies promote a better society, more fair, more just, and more accountable – a world where technology promotes broad social inclusion based on fundamental rights, democratic institutions, and the rule of law. CAIDP provides expert guidance on AI policy to governments and international organizations, including UNESCO, OECD-GPAI, the Council of Europe, G7 and G20, and the European Parliament.[5]

CAIDP has previously submitted statements to the Agency for Development of Electronic Government and Information Society (AGESIC) of Uruguay for having incorporated recommendations for the public consultation process into Uruguay's National AI Strategy 2024–2030 [6]. Additionally, CAIDP submitted a statement to the government of Uruguay to sign and ratify the Council of Europe AI Treaty[7].

CAIDP urges Uruguay to fulfil its obligations under the CRC and its Optional Protocols and to ratify and implement the Council of Europe Framework Convention on Artificial Intelligence[8] to strengthen child-rights impact assessments, independent oversight, and access to effective remedies.

Additionally, CAIDP Uruguay implement the UNESCO's Guidance on AI and Children[9] along with the commendable progress on implementation of the findings of the UNESCO RAM. The 2026 CAIDP AI Index records Uruguay's completion of UNESCO's Readiness Assessment Methodology (RAM) and cites UNESCO's confirmation of progress in implementing the

[4] CAIDP, https://www.caidp.org/

[5] CAIDP, *Statements*, https://www.caidp.org/statements/

[6] CAIDP, *CAIDP Update 6.48 – AI Policy News* (16 Dec. 2024), https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-update-648-ai-policy-news-dec-activity-7274415679728975873-fI4o; CAIDP, *Artificial Intelligence and Democratic Values: CAIDP AI Index 2026* (2026), Uruguay, p. 1638, https://www.caidp.org/reports/caidp-index-2026/.

[7] CAIDP, Statement to the government of Uruguay to sign and ratify the Council of Europe AI Treaty (27 Mar. 2025), https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-ai-treaty-uruguay-march-27-2025-activity-7311194771677425667-yAsL

[8] Council of Europe, The Framework Convention on Artificial Intelligence (5 Sep. 2024), https://www.coe.int/en/web/artificial-intelligence/the-framework-convention-on-artificial-intelligence

[9] UNESCO, Guidance on AI and Children (Dec. 2025), https://www.unicef.org/innocenti/media/11991/file/UNICEF-Innocenti-Guidance-on-AI-and-Children-3-2025.pdf

Recommendation on the Ethics of Artificial Intelligence.[10]

CAIDP further recommends that educational AI systems not be deployed without prior assessments of their potential impact on children's rights, including the risk of unlawful processing of minors' data.[11] In particular, CAIDP suggests that public authorities conduct child-rights impact assessments[12] and independent reviews before procuring or deploying educational AI systems, publish summaries of these assessments, provide training for teachers and public officials, and establish accessible complaint and remedy mechanisms. Consequently, CAIDP urges schools to conduct periodic reassessments whenever an AI system's design, context, or use changes.

Prohibit manipulative, addictive, exploitative, and abusive AI practices.

AI systems can intensify exploitation, harassment, privacy violations, and psychological risks through pervasive data collection, subliminal techniques designed to deceive, manipulate, mimic human relationships, maximize engagement, synthetic intimate imagery, unsafe conversational interactions, and child-accessible AI products.[13] "Nudify" apps available in mainstream app stores are used to create non-consensual intimate images of children, sometimes by their peers, and AI-generated sexual content fuels the sextortion of children.[14]

---

[10] CAIDP, *Artificial Intelligence and Democratic Values: CAIDP AI Index 2026* (2026), Uruguay, pp. 1651–1652, https://www.caidp.org/reports/caidp-index-2026/, *Consolidated Report on the Implementation by Member States of the 2021 Recommendation on the Ethics of Artificial Intelligence* (2025), https://unesdoc.unesco.org/ark:/48223/pf0000396134.

[11] CAIDP, Statement to China's National Cybersecurity Standardization Technical Committee (TC260) on its proposed Guidelines for the Safety of Cybersecurity Technology and Artificial Intelligence Technology in Applications Involving Minors, https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-china-ai-guidelines-minors-16-august-activity-7494757774451712001-B3KV

[12] CAIDP, Statement to United Nations Office of the High Commissioner for Human Rights (OHCHR) in response to its Global Call for Inputs on Child Rights and Safety in the Digital Environment, pursuant to Human Rights Council Resolution 56/6 (30 Oct. 2026), https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-un-ohchr-child-safety-30-oct-2026-activity-7521778214092853248-YsvY

[13] *See,* CAIDP, *Comments to Child Safety in Companion Chatbots — CAIDP supports AB 2023 and SB 1119* (15 Jun. 2026), https://www.caidp.org/california/; CAIDP, *Statement for the Record: Hearing to Examine STOP SCAM ACT, U.S Senate Judiciary Committee* (11 Mar., 2025), https://www.linkedin.com/posts/caidp-sjc-stop-csam-act-march-11-2025-ugcPost-7305415016038477827-ksym/; CAIDP, *Statement to OHCHR on Child Rights and Safety in the Digital Environment pursuant to Human Rights Council Resolution 56/6* (30 Oct. 2026), https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-un-ohchr-child-safety-30-oct-2026-activity-7521778214092853248-YsvY

[14] UNICEF, *Guidance on AI and Children 3.0* (2025), https://www.unicef.org/innocenti/media/11991/file/UNICEF-Innocenti-Guidance-on-AI-and-Children-3-2025.pdf

More than 8,000 AI-generated child sexual abuse images and videos were identified in 2025.[15] Chatbots that simulate companionship can foster dependency and fail children in moments of crisis. AI is also entering toys. The FoloToy Kumma teddy bear, marketed for children aged 3 to 12, told testers where to find knives and pills, explained how to light matches, and discussed sexual fetishes.[16] Children's images and personal data are scraped into the datasets used to train these systems.

CAIDP recommends binding safety-by-design duties addressing harmful features and foreseeable misuse, supported by independent assessments.[17] To complement these guardrails CAIDP urges Uruguay to prohibit subliminal techniques in AI systems commensurate to the prohibited practices set out in the EU AI Act because many advanced AI tools are general purpose and marketed to both adults and children.

CAIDP further recommends targeted safeguards against discriminatory outcomes, technology-facilitated gender-based violence, and the creation or misuse of synthetic sexual imagery, recognizing that girls may face disproportionate harm from gender-based abuse[18] and non-consensual sexual deepfakes.

Protect minors' data, communications, privacy, and autonomy.

CAIDP urges Uruguay to strengthen safeguards for children's personal data, communications, privacy, and autonomy in AI-enabled environments.

CAIDP recommends that Uruguay prohibit the use of minors' conversations to train or refine AI systems[19], except where strictly necessary for child safety and subject to appropriate safeguards. CAIDP further recommends requiring privacy and safety by design, data minimization, privacy-preserving age assurance, child-rights impact assessments, algorithmic

[15]Independent International Scientific Panel on AI, *Preliminary Report of the Independent International Scientific Panel on AI*, (July 2026), https://www.un.org/independent-international-scientific-panel-ai/sites/default/files/2026-07/en_Preliminary%20Report_.pdf

[16]CAIDP, *Statement for the Record: Innovation with Integrity: Examining the Risks and Benefits of AI Chatbots, U.S. House Energy and Commerce Committee* (17 Nov, 2025), https://www.linkedin.com/posts/caidp-house-commerce-ai-chatbots-nov-ugcPost-7396611675031879680-MeSr/

[17] Ibid

[18] Human Rights Council Advisory Committee, Technology-facilitated gender-based violence and its impact on women and girls (22 Jul. 2026), https://docs.un.org/en/A/HRC/63/66

[19] CAIDP, Statement to China's National Cybersecurity Standardization Technical Committee (TC260) on its proposed Guidelines for the Safety of Cybersecurity Technology and Artificial Intelligence Technology in Applications Involving Minors, https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-china-ai-guidelines-minors-16-august-activity-7494757774451712001-B3KV

transparency, and independent oversight[20]. These measures would help ensure that AI systems respect children's privacy and autonomy rather than exploit their personal information or vulnerabilities.

Establish oversight, remedies, literacy, and participation.

CAIDP recommends that Uruguay build on its digital-inclusion initiatives to ensure that AI supports children's learning, creativity, communication, access to information, and participation while respecting their rights, safety, privacy, freedom of expression, and autonomy. However, without comprehensive safeguards in place, the risks outweigh the benefits.[21] In particular, CAIDP suggests strengthening digital citizenship and age-appropriate AI literacy through Ceibal and schools, enabling children and adolescents to understand AI's limitations and risks, recommendation systems, their digital rights, and how to critically assess information in AI-influenced environments and seek redress when harmed. CAIDP further recommends providing teachers with the training and resources necessary to guide these discussions and ensuring that children, families, educators, and other stakeholders participate in decisions concerning the use of AI in education.

CAIDP further recommends that Uruguay strengthen institutional accountability and access to justice by establishing an independent AI supervisory body empowered to assess risks, monitor and evaluate deployed systems, publish findings, investigate complaints, and suspend or terminate harmful deployments[22]. Developers and deployers should be held accountable for the impacts of their systems and required to provide effective remedies when harm occurs. CAIDP also recommends establishing accessible complaint mechanisms, clear implementation deadlines, and regular public reporting to ensure effective enforcement. Children and their guardians should have access to understandable explanations, meaningful

[20] Ibid.

[21] Burns, M., Winthrop, R., Luther, N., Venetis, E., & Karim, R., A new direction for students in an AI world: Prosper, prepare, protect (2026), Brookings Institution, https://www.brookings.edu/wp-content/uploads/2026/01/A-New-Direction-for-Students-in-an-AI-World-FULL-REPORT.pdf

[22] CAIDP, Statement to China's National Cybersecurity Standardization Technical Committee (TC260) on its proposed Guidelines for the Safety of Cybersecurity Technology and Artificial Intelligence Technology in Applications Involving Minors, https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-china-ai-guidelines-minors-16-august-activity-7494757774451712001-B3KV

participation, and timely redress[23], ensuring that AI serves children's best interests and supports their rights and well-being.

Closing Remarks

We thank you for considering our contributions. We welcome the opportunity to engage and discuss these recommendations in further detail.

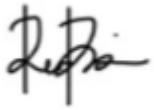
Sincerely,



Marc Rotenberg
CAIDP Founder &
Executive Director



Merve Hickok
CAIDP President



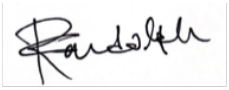
Ren Bin Lee
Policy Group Associate



Ruoyi Lu
Policy Group Lead



Waridah Makena
CAIDP Policy Group
Member



Christabel Randolph
CAIDP Associate Director



Sreya Francis
Policy Group Member

[23] CAIDP, A Call to the Republic of Kazakhstan to Request Observer Status on the Council of Europe Steering Committee for New and Emerging Digital Technologies (CDNET) and Sign and Ratify the International Treaty on AI, Human Rights, Democracy, and the Rule of Law (8 Oct. 2026), https://www.linkedin.com/posts/center-for-ai-and-digital-policy_caidp-kazakstan-ai-treaty-8-october-2026-activity-7513368771252703233-v-yi