

HELSINKI CONSULTATION WORKSHOP REPORT

# #ai4children

# Background

As part of the Artificial Intelligence (AI) and Child Rights Policy Project, UNICEF, in partnership with the Government of Finland, is hosting a series of workshops around the world to gain regional perspectives on AI systems and children. These conversations will help UNICEF develop a policy guidance on how to promote children's development in AI strategies and practices.

The first workshop was held in Helsinki, Finland, on 26 November 2019, with participants from Finland, Norway, Sweden, Estonia, the United Kingdom and Turkey. Various sectors were represented, including UNESCO, the UN Technology Innovation Lab, LEGO, Turkcell, Vodafone, PwC UK, the Alan Turing Institute, Children's Commissioner for England, and academics from a range of European universities. The Helsinki workshop [agenda](#) and information from the [kick-off workshop in New York](#) in June 2019, provide further background.

The half-day workshop was opened by Jarmo Sareva, Ambassador for Innovation, Ministry of Foreign Affairs, Finland, and Jussi Kivipuro, Development Director, UNICEF Finland. Ambassador Sareva highlighted Finland's ongoing commitment to ethical AI. Finland is actively supporting the recommendations in the report of the UN Secretary-General's [High-level Panel on Digital Cooperation](#). Ambassador Sareva confirmed that as part of these efforts, Finland is proud to partner with UNICEF to ensure the realization of child rights in the digital sphere.

Taking place on the 30<sup>th</sup> anniversary of the Convention on the Rights of the Child, Mr. Kivipuro reminded the group how much has been achieved for children since 1989, and how the authors of that remarkable document could not have imagined the extent to which AI would begin to shape children's lives. He noted that the workshop was the start of a journey to determine whether, in the future, children will own their identity and data or whether it will be owned by someone else; whether children get to utilize wonderful digital products or whether they are the product themselves.

Since most attention around AI is on government policies and industry implementations, the workshop participants were asked to use these lenses to provide feedback on the draft UNICEF principles for AI and child rights, challenges to more child-friendly AI policies and practices, and suggested topics and format for the AI policy guidance as detailed below. In many cases the feedback from a government or business perspective could easily apply to the other.

## Principles for AI and child rights

After reviewing the [draft Principles for AI and Child Rights](#), the workshop group provided feedback on the following principles:

## PROTECT AND NURTURE CHILDREN'S DATA AGENCY

### Consider children's age and their ecosystem

- Children's ownership of their data conjures questions as to how data should be gathered for AI-related purposes, and at what age. In the digital world, data gathering of a child can begin before birth. As children grow, we must recognize that their data changes as well.
- It is necessary to consider the agency of children within their own ecosystem, but we should also consider the influence and responsibility of parents, educators, and caregivers, amongst others, on how children's data is collected and processed.

### Reflect on children's responsibility

- It is important to note that age can be an imprecise proxy for developmental stages. The Convention on the Rights of the Child states that, "Children's levels of understanding are not uniformly linked to their biological age" and that "Maturity is difficult to define."
- The Principles place too much of the responsibility on children. For example, how can a child understand how to own data?

### Clarify key terms and the impact of AI on children

- Data agency is a relatively unclear term and may confuse the policy guidance audience. The Principles should also clarify what is meant by the term "data". For instance, does it refer to created data, inferred data, or biometric data?
- The impacts of AI systems on children must be made clear, as well as what is needed to ensure that the effects are not harmful.

## ENSURE TRANSPARENCY, EXPLAINABILITY AND ACCOUNTABILITY FOR CHILDREN

### AI design and development

- Product transparency should be designed from the start by user interface and user experience specialists.
- Accountability does not only lie with the creators of AI systems, but could also include procurement, regulators, etc.
- Explainability is a broad concept that in practice needs to be audience-specific and appropriate.
- Equally, transparency requirements differ by stakeholder (i.e. child, parent, teacher, social worker, etc.)

## PRIORITIZE EQUITY AND INCLUSION OF CHILDREN

### Equal participation of children is essential

- It is not apparent where children's voices are reflected in the Principles – this needs to be made clearer.



PARTICIPANTS DISCUSS THE CHALLENGES TO CHILD-FRIENDLY AI SYSTEMS  
(CREDIT: BETTINA KOEBLER)

# Challenges to more child-friendly AI policies and systems

## GOVERNMENT PERSPECTIVE

### Government AI policies and strategies are not more ethical or child-focused (yet) because...

- Children are not considered a priority stakeholder and are seen as politically weak. As a result, children and their advocates are not invited to participate in the AI strategy development process.
- The rapid speed of AI development makes it difficult for research, policy, and advocacy to keep up with the potential AI implications. Research and evidence are strongly needed to make AI's impact on children real for governments. Without this evidence, the required policy development will lag behind.

### Government AI systems are not implemented in a more ethical or child-friendly way (yet) because...

- The necessary AI expertise and data sets are lacking.
- The quality of the existing data is poor.
- Governments are structured in a very siloed way and more collaboration between different government departments and disciplines is needed.

## BUSINESS PERSPECTIVE

### Companies' AI codes of conduct and policies are not more ethical or child-focused (yet) because...

- It is challenging to ensure the appropriate responsibility of all actors across the AI delivery chain.
- AI systems are complex and require a certain level of comprehension. This may mean that some companies avoid deep engagement. This can also create barriers to transparency in the development process.
- There is a lack of understanding around the impact of AI systems on children. A much more nuanced understanding of what constitutes healthy development in a digital environment is needed.
- Catering to different child developmental stages is a major overhead expense in product development and research. High costs can also prevent companies from fully exploring the opportunities of what AI can offer.
- A lack of regulation and standardization for companies makes it difficult to navigate the AI space in a child-friendly approach.
- Finding the safe-versus-interesting balance for digital products is challenging. It is important to keep children safe, but not over-protect them in a way that limits their freedom of expression or interaction with their peers.

### Companies' AI systems are not implemented in a more ethical or child-friendly way (yet) because...

- Companies have limited incentives or motivations to consider the rights of children, especially when they are not customers.
- From a 'risk' perspective, users' data is often hidden to all except the core development teams. This means it can be hard to manage overall data collection and processing with AI systems.
- Ethical guidelines are often at the box-checking level. They are not practical and sometimes they do not change developer behavior, especially when few people read them.
- There is a lack of communication between sectors. As with government entities, business leads, data scientists, and engineers often operate in silos.

# Suggested topics for the AI policy guidance

## GOVERNMENT PERSPECTIVE

### For suggested topics for the guidance, we prioritize government policy and practice to...

- Find a balance between systemic protections and enablers – which governments can help develop and oversee – versus those that each person is responsible for. The creation of additional safeguards should be a shared responsibility and not only rest on children.
- Create policy labs for the development of new services and enable prototyping in real-life settings.
- Be more proactive in co-designing the development of services with children.

- Highlight the holistic ecosystem needed to make the most of AI systems, including technology access, AI literacy and data pools.
- Place an emphasis on vulnerable groups of children to ensure inclusion and equity.
- Prepare children for a changing digital world and the future workforce by teaching critical thinking, empathy, creativity and social and emotional skills - not just technical skills. AI literacy for children and those in their ecosystem should start as early as possible. The focus should be on educating children on their rights and digital citizenship. Training should be grounded in narrow AI and specific use cases versus general AI.
- Include a section on incentives and changes needed to implement the guidance. For example, tax incentives for companies, international regulations, funding for the best ideas to promote ethical AI, an AI award for ethical AI, child-friendly AI system certifications, etc.
- Analyze the excessive use of digital technologies due to AI-fueled algorithms and dark patterns. How can the issue of 'technology addiction' be addressed (for example, through changing business models, self-regulation, parental involvement, etc.)?

## BUSINESS PERSPECTIVE

For suggested topics for the guidance, we prioritize business policy and practice to...

- Explore the issue of consent for different child age brackets.
- Examine children's use of adult online platforms. How should systems that use AI differ between age groups? How should age be a key variable?
- Design with children. They need to be seen as active agents in AI, not as passive stakeholders.

# Suggestions for the format of the AI policy guidance

The policy guidance would be most useful in these formats...

- A general summary followed by sections specific to different stakeholders across the 'end to end' process (i.e. policymakers, data scientists / analysts, designers, developers, children, etc.)
- Practical and succinct guidelines with specific requirements, bolstered by examples and use cases.
- A simple checklist to accompany key sections.
- Measurable requirements, if possible.
- A living document with resources and definitions that can be updated over time. Multimedia could accompany the document.
- A child-friendly format to make it clear that children were consulted in the formation of the guidelines.

# Next steps

UNICEF will host several more workshops to gain other regional perspectives on AI and children's issues. Through this consultative process we will develop a draft policy guidance, to be released in June 2020. If you are interested in getting involved in this project, please contact Steven Vosloo at [svosloo@unicef.org](mailto:svosloo@unicef.org).

Helsinki Consultation Workshop Report

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