#DigitalDecade4YOUth: Making Europe's *Digital Decade* fit for children and young people

Targeted Consultation with the Research Community on the revision of the BIK Strategy

Fields marked with * are mandatory.

About this consultation

As part of the policy making process to support **Europe's digital transformation** by 2030, the European Commission initiated a comprehensive consultation process with children, young people, parents and carers, teachers and educators, and other stakeholders from across the European Union on the priorities they see to **promote, protect, respect and fulfil children rights in a digital world**. Public consultations have already taken place on the EU Strategy on the Rights of the Child, the EU Strategy for a more effective fight against CSAM and the Digital Principles, which have included targeted questions on the challenges for online safety.

The purpose of this consultation is to seek the views of the **research community**, in particular researchers with expertise in the study of children's use of digital technologies and experiences of the digital environment. The aim of this targeted consultation is to collect expertise and views on needs, gaps and emerging risks impacting on children's well-being, online confidence and resilience in order to identify new actions and ensure synergies and coordination at European, national and international level.

In this survey, we invite researchers to contribute through open text responses on key policy areas such as:

- the digital literacy and skills needed to best equip children, and
- emerging challenges and risks and measures required to make the digital environment a better place for European children and young people, and
- policy for the digital environment.

Please note, in this survey we are specifically referring to children and young people up to the age of 18. We would very much welcome links to relevant research, evidence and case studies in the responses to the questionnaire.

The responses will contribute, along with input from other stakeholders including children and young people, to the new **Better Internet for Kids (BIK) Strategy** to be adopted in 2022.

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* In which country are you based? If your country is not listed, please select 'Other' from the bottom of the list and type your country name in the box below.

Other (please state below)

Other (if your country is not listed above):

Text of 1 to 20 characters will be accepted

Switzerland

* Would you be interested in participating in a workshop on Tuesday, 26 October 2021 to discuss the findings of this consultation to be held during the month of October.

YesNo

If yes, please supply a contact email address.

20 character(s) maximum

Section 1: Opportunities and Benefits

What are the main barriers to ensuring all children and young people enjoy high quality, safe and secure access to the digital environment?

Research has shown that there are many barriers to ensuring all children and young people enjoy high quality, safe and secure access to the digital environment, from cyber-grooming, body-shaming, cyber-bullying, access to adult content, techno-addiction etc. etc. In this response to the EU Survey I would like to focus on one particular aspect that has transformed children and youth digital environment over the last few years: the rise of AI systems which are based on deep learning, gather large quantities of personal data and profile children for a variety of purposes: to judge and assess their educational skills (personalized learning technologies), their health (health tracking technologies) or their entertainment choices (social media, virtual assistants etc.etc.). Whilst many of these technologies, can bring important opportunities -especially in terms of addressing children's special needs, developing health plans, encouraging active participation at school, playfulness, interactivity and social skills at home – there are many barriers and challenges that come from this AI driven digital environment which expose children to the following problems:

• An unprecedented amount of collection of personal data and loss of privacy

• The constant exposure to algorithmic profiling - on the basis of data traces collected from within their daily life – and hence to algorithmic bias, error and unaccountability

• The use of technologies (e.g. virtual assistants) that are not designed or targeted for them. This does not only imply exposure to non age-appropriate needs, designs and content but also interaction with data environments that challenge some of the effectiveness of regulations such as COPPA or the GDPR aimed at protecting minors.

In discussing these barriers in this response I base myself on the findings of the 3 year project on children's data rights, and on the following reports:

Barassi (2020) "The Human Error in AI and Question about Children's Rights." White Paper On Artificial Intelligence – A European Approach to Excellence and Trust. EU Comission, 2020. http://childdatacitizen. com/cdc/wp-content/uploads/2020/06/The-Human-Error-in-AI-and-Children-Rights_Prof.-Barassi_Response-to-AI-White-Paper-.pdf.

Barassi V. and Scanlon P (2019) Voice Prints and Children's Rights, Response to OHCHR Call for Submissions on the General Comment on Children's Rights in Relation to the Digital Environment – 15th of May, 2019 http://childdatacitizen.com/cdc/wp-content/uploads/2019/05/Voice-Prints-and-Childrens-Rights. pdf

Barassi, V. (2018). Home Life Data and Children's Privacy [Call for Evidence Submission Information Commissioner's Office]. Goldsmiths University of London. http://childdatacitizen.com/home-life-data-childrens-privacy/

What evidence is there regarding trends in children and young people's progress along the "ladder of opportunities", i.e., moving from passive consumption towards active participation, creative activities and digital citizenship?

Al agents can bring important opportunities for youth and children. This is particularly true if we consider for instance the rapid growth in use of voice operated AI technologies. These technologies - could have a fundamental impact on enabling youth and children to progress along the 'ladder of opportunities' in the digital environment. For instance they can be seen as widening participation in many different ways: they foster active participation, playfulness and access to a wide variety of educational content. For example, research has shown that voice recognition technologies can lead to important opportunities for literacy, learning and widening participation for special needs children. These opportunities have long been noted. In 1999, Raskind and Higgins (1999) conducted a study of children aged 9 to 18 with learning disabilities and concluded that speech recognition compensated for poor writing skills and also assisted students in reading and spelling. In 2006, Adams (2006) explored the benefits of speech recognition technologies for literacy in both children and adults, and discussed the importance of bringing voice recognition to the classroom to foster reading fluency and engagement. Other scholars have shown how these machines can be a real support for children with special needs, such as autism (Cabibihan et al., 2013). In one of the largest studies of its kind, conducted in 2020, researchers at the University of Southern California placed a social robot in the homes of 17 children with autism for a month, using AI technologies focused on personalised learning, and found not only that these robots were able to achieve significant levels of support and interaction, but also that - after a month spent in a child's company - they were able to predict by 90 per cent whether or not the child was interested in a specific piece of content. In a different part of the world, in Armenia, researchers tested the benefits of a robot called Robin in a children's hospital and found that, after interacting with Robin, patients experienced not only an increase in appetite but also in emotional well-being (Kart, 2020). The case of voice operated Als is a vivid example of how these technologies can lead to important benefits in children' s lives and society as a whole, and the same can be said about other AI driven technologies used for personalized education or health profiling. However there are many challenges that we are faced with.

Adams, M. (n.d.). Technology for Developing Children's Language and Literacy: Bringing Speech Recognition to the Classroom. Joan Ganz Cooney Center at Sesame Workshop.

Cabibihan, J.-J., Javed, H., Ang, M., & Aljunied, S. M. (2013). Why Robots? A Survey on the Roles and Benefits of Social Robots in the Therapy of Children with Autism. International Journal of Social Robotics, 5 (4), 593–618. https://doi.org/10.1007/s12369-013-0202-2

Kart, J. (2020, June 17). Robin The Robot Comforts Kids In Hospitals, Can Help With Covid-19. Forbes. https://www.forbes.com/sites/jeffkart/2020/06/17/robin-the-robot-comforts-kids-in-hospitals-can-help-with-covid-19/

Raskind, M. H., & Higgins, E. L. (1999). Speaking to read: The effects of speech recognition technology on the reading and spelling performance of children with learning disabilities. Annals of Dyslexia, 49(1), 251–281. https://doi.org/10.1007/s11881-999-0026-9

What are the key emerging issues impacting on children's health, well-being and self-efficacy when they go online? What steps are needed at the policy level to foster better outcomes for young people?

see above and below

What initiatives may be needed to ensure that children with special needs enjoy the benefits of the digital environment?

Research, as mentioned above, has demonstrated the positive impact of AI driven technologies for children with special needs. Yet much more work is needed in this regard and we need new, research based initiatives which study AI driven tech for children with special needs. This research should be used to create research-led, privacy by design technologies that are safe and designed in the best interest of the child and youth. It is important though that these initiatives do not embrace a techno-solutionist stance, that they are critically aware of issues such as digital divide, and do not see these technologies as taking the place of broad publicly funded interventions in education, learning or health.

What evidence is available regarding the potential or the impact of new and emerging technologies on online opportunities and benefits for children and young people?

There is outstanding research out there that focuses on children's digital practices. The following projects and research hubs are an excellent example of this: EU Kids Online, Toddlers and Tablets, Net Children Go Mobile, the Connected Learning Research Network, Children's Digital Media Centre. All these different and interconnected research projects show us that, when we think about technologies, children cannot be lumped together with adults as part of the wider population, but their digital experiences, needs and concerns matter in their own right (Livingstone, 2009). The author of this response has focused primarly on the issue of children's data rights, Al technologies and algorithmic profiling. The findings of her project can be found on the http://childdatacitizen.com project website and in the book Child Data Citizen: How Tech Companies are Profiling Us from Before Birth (MIT Press, 2020).

Barassi, V. (2020). Child Data Citizen: How Tech Companies are Profiling Us from Before Birth. The MIT Press.

Livingstone, P. S. (2009). Children and the Internet: Great Expectations, Challenging Realities (1 edition). Polity.

Considering the importance of multistakeholder cooperation in the area of positive online experiences for children, who should lead (EC/MS/industry/others), how can it be best supported and by whom?

Multistakeholder cooperation in the area of positive online experiences for children is of pivotal importance, especially when it comes to educating them on the functioning of AI systems, algorithmic profiling and other important aspects that define our data environments. Yet much work needs to be done to make sure that business and policy initiatives are in fact research-led and open to critical and independent research perspectives. More partnerships between academics, policy makers and companies are needed, and more collaborations should be established.

Section 2: Digital Literacy and Skills

What are the most important skills and competences needed by the youngest users to enjoy safe and secure access and experience of the digital world?

There are many issues that emerge as children and youth interact with AI agents, and they need to develop the appropriate skills and competences to enjoy a safe and secure experience of these technologies, for example, they need to develop:

• Knowledge of Complex Data Environments: Although research (Stoilova et al., 2019) has shown that children have an understanding of data privacy, and the youth is showing a greater awareness of the

importance of data privacy and digital citizenship on social media, children and youth have still very little awareness of how AI agents use data, how algorithmic profiling happens, and some of the complexities of our data environments.

Understanding of AI communication - When we think about children's and youth interactions with Voice-Operated AI agents, one of the most important main skill and competence that needs to be taught to them to guarantee a secure experience is the ability to talk and think about their 'relation' to AI communication. Several studies published in the last decade have focused on the idea of trust, showing that children and youth very often build trusting relationships with voice-operated AI systems who learn from them and interact with them. The problem we face is that - as noted by Stower et al. (2020) in their analysis of no less than 424 research articles on trust between children and social robots - there is no agreement among researchers on how to understand children's trust in social robots. At the moment, therefore, as a society we still do not have a clear idea of the relationship between children and artificial intelligence. What we do know is that children interact with these machines and create a certain kind of relationship. And that this interaction is not necessarily positive for children. In the collection of research articles published by Mascheroni and Holloway (2019) there are many examples of this ambivalence between positive and negative aspects when we think about interconnected toys; a chapter by Marsh (2019) even shows how sometimes connected toys can create real phobias in children. Children and youth need to develop critical skills to reflect on their relationship with AI communication. This skill can be essential also to overcome another fundamental problem of the interaction between children and AI agents. In fact, as noted by Khan because "these machines can be conceptualised as both social entities and objects, children could dominate them and reify a master-servant relationship, and this could lead to harmful developmental outcomes' (Khan et al., 2012). This negative aspect of the relationship between children and virtual assistants has been understood by several tech-businesses. In fact, both Google and Amazon already in 2018 started asking children to use magic words ("thank you", "you're welcome") to urge them to be educated with virtual assistants. While this may seem like a solution to try to address the downsides described by Kahn et al. (2012), we really need to ask ourselves what are the implications of the fact that we are teaching our children to treat AI objects as if they were semi-human, with emotions and empathy. In his article, Elgan (2018) gives the example of a jar of peanut butter: if a child cannot open a jar of peanut butter, it is likely that they will say "come on, open up!", but it does not occur to us to ask the child to be nice to the jar or to say "please". So why, Elgan wonders, should we require children to say 'please' to a virtual assistant, given that it is an inanimate object itself? Again a critical understanding and awareness of AI communication is key in enabling children and youth to have a secure experience.

• Technological awareness: Children need to develop a clear understanding of the difference between interacting with technologies and platforms that are targeted and designed for them or with platforms that are designed and targeted at adults. For instance, on a daily basis children may be interacting with virtual assistants and their skills (which are not designed or targeted for them such as Aexa or YouTube not for kids). Understanding the difference between interacting with child-friendly technologies and adult-centered ones is a priority in the new digital environments.

Elgan, M. (2018, June 24). The case against teaching kids to be polite to Alexa. Fast Company. https://www.fastcompany.com/40588020/the-case-against-teaching-kids-to-be-polite-to-alexa

Kahn, P. H., Gary, H. E., & Shen, S. (2013). Children's Social Relationships With Current and Near-Future Robots. Child Development Perspectives, 7(1), 32–37.

Mascheroni, G., & Holloway, D. (2019). The Internet of Toys: Practices, Affordances and the Political Economy of Children's Smart Play. Springer International Publishing.

Stower, R., Calvo-Barajas, N., Castellano, G., & Kappas, A. (2021). A Meta-analysis on Children's Trust in Social Robots. International Journal of Social Robotics.

What does research tell us about children and young people's skills in personal data management? Are there particular gaps which require education and training reinforcement?

Over the last two years we have seen the emergence of new and important research on children and youth data literacy and how they negotiate with the question about data privacy. (Stoilova et al., 2019). Yet as I have discussed in different publications, including my latest book Child Data Citizen: How Tech-Companies are Profiling Us from before Birth (MIT Press, 2020) the problem goes well beyond personal data management, and children need to understand the ways in which the data technologies that they use (social media, apps, games etc.) actually use their data. This awareness is essential for them to critically reflect on the type technologies that they decide to use, maybe leading them to favor more privacy oriented technologies over others. More education and training is needed in this regard.

Barassi, V. (2020). Child Data Citizen: How Tech Companies are Profiling Us from Before Birth. The MIT Press.

Stoilova, M., Nandagiri, R., & Livingstone, S. (2019). Children's understanding of personal data and privacy online – a systematic evidence mapping. Information, Communication & Society, 0(0), 1–19. https://doi.org /10.1080/1369118X.2019.1657164

What are the implications of new and emerging technologies (e.g., AI, extended reality, gaming etc.) for digital literacy and skills education and training?

All this response focuses on Al agents. (see above in relation to skills and training)

What can research tell us about the most effective ways to deliver online safety education and training in formal and informal education settings?

n.a. to my research

What are the most important skills needed to enhance children's participation and digital citizenship skills?

n.a. to my research

What gaps exist, in your view, in current awareness raising activities and topics?

There are two fundamental gaps that exist in my opinion when it comes to raising awareness of the current digital environment:

Lack of education of the complexity of our data environments - Much of current awareness activities

are focused on finding specific solutions: e.g. how to protect your privacy; how to manage your personal data; how to be a good digital citizen on social media; how to protect yourself from cyberbullying or online predators. Although important these activities often miss out on educating children and youth the complexity of our data environments, for instance how data is collected and used to profile individuals, the role of data brokers, the implications of cross-national data sharing exchanges,

• Lack of education on the use of AI systems. Eg. how machines learn from our data, how algorithmic profiling actually works and how our societies are increasingly reliant on algorithmic-decision making and the exploitation of personal data from schools to hospitals, governments, etc. etc.

Do you have any other observations on the subject of digital literacy and skills?

no

Section 3: Creating a safer environment

What can the research tell us about vulnerability, risks and potential online harms experienced by younger users (i.e. aged 13 and under)? What are the main gaps from a policy point of view?

The use and interaction with AI agents hold much promise and opportunities for children, they can advance literacy, widen participation and access to information; they can also foster, creative interaction, playfulness and exploration for children. Yet in the current digital environment these technologies pose a threat to children because of a lack of transparency with the regard to the use of their personal data. AI agents rely on a business model that is extraordinarily complex and involves an incredible plurality of companies and agents that process children's personal data. The data collected from AI agents in the home (toys, virtual assistants, IoT etc) will end up as part of the modern exploitative business models within the data brokering ecosystem. However, the ways in which companies gather, archive and sell home data or the ways in which they profile, sort and classify their users (including children) is still unknown because of the secrecy of algorithms (Pasquale, 2016) and the practices of data brokers in general (FTC, 2014).

Debates about the privacy implications of AI home assistants and Internet of Things focus a lot on the the collection and use of personal data. Yet these debates lack a nuanced understanding of the different data flows that emerge from everyday digital practices and interactions in the home and that include the data of children.

In 2018, in order to reflect on the complexity of home data, I came up with the term 'home life data' in a report that I submitted to the Information Commissioner Office in the UK and was signed by Gus Hosein, the Executive director of Privacy International and supported by Jeff Chester the director of the Centre for Digital Democracy in the US (Barassi, 2018). In the report I argue that home hubs do not only collect personal data but different types of data. These different types of data include the following categories, which I revised and updated following the report:

Household data – Home hubs and smart technologies collect a wide variety of household data from shopping lists to energy consumption and gather key information on families' behaviors, choices and routines (including the ones of children).

Family data – Home hubs gather a lot of family data which refers to family socio-economic background, family history, ethnicity, religion, social and political values, medical conditions etc.

Biometric data - Most Virtual Assistants and smart technologies rely on the gathering of biometric data

(voice recognition or facial recognition) that can be mapped to unique users, including children.

Situational data – Al technologies to function need to gather situational data of the individual and the family. They need to be able to answer questions such as what room belongs to whom? They need to be able to register changes in family members or changes in circumstances etc.? Conflicts and tensions? Etc. The fact that companies can gather all these different forms of data implies not only that they have the potential to harness highlight contextual data from children but also to integrate this data with biometric information. The privacy implications of technologies that can integrate context and biometrics are immense. Being profiled on the basis of home life data can lead to all sorts of implications not only on children's right to privacy (UNCRC, Article 16), freedom of expression (UNCRC Article 13) and freedom of thought (UNCRC, Article 14) but also on their right to non-discrimination (UNCRC Article 2), best interest (UNCRC Article 3) and optimum development (UNCRC Article 6). (Barassi and Scanlon, 2019) So far however, we do not have policy and regulations that address the problem.

Barassi V. and Scanlon P (2019) Voice Prints and Children's Rights, Response to OHCHR Call for Submissions on the General Comment on Children's Rights in Relation to the Digital Environment – 15th of May, 2019 http://childdatacitizen.com/cdc/wp-content/uploads/2019/05/Voice-Prints-and-Childrens-Rights. pdf

Barassi, V. (2018). Home Life Data and Children's Privacy [Call for Evidence Submission Information Commissioner's Office]. Goldsmiths University of London. http://childdatacitizen.com/home-life-data-childrens-privacy/

What evidence is there of emerging trends or patterns of use by children that may give rise to privacy concerns. What are the main gaps from a policy point of view?

See above

What evidence exists regarding challenges experienced by children and young people arising from how digital services, products and platforms are designed?

There are two main problems that emerge from the current digital environment. On the one hand children are often exposed to tech designs and algorithmic logics that are repurposed for them, but are originally conceived for adults (see for instance YouTube for Kids, Messanger for Kids, Instagram for Kids) and hence are not designed in their best interest and lead to adult-centred processes (e.g. image obsession, techno-dependency etc.) which can be harmful for children. On the other hand children use home hubs and smart technologies that are targeted at adults but that thet encounter (Montgomery, 2015) in everyday life, and that collect their personal data. These technologies challenge some of the effectiveness of regulations such as COPPA or the GDPR to protect children's privacy in the automated home and expose them to non age-appropriate environments

What are the main risks and challenges faced by children and young people with regard to commercial communication, consumer or contract risks?

Data gathering and profiling are the main risks, see above for in-depth explanations

What can the research tell us about new risks for children and young people in the area of peer-to-peer communications and/or self-generated content?

n.a. to my research

What can research tell us about the needs of victims of online abuse and harm?

n.a. to my research

What evidence is there of effective preventative measures regarding perpetrators of online abuse and harm?

n.a. to my research

Do you have any other observations on priorities regarding new risks and potential harms faced by children and young people in the digital environment?

In the interaction with AI agents, one of the main risks brought about by this new digital environment lies in the misuse of children's data and the practice of algorithmic profiling. Other risks include the fact that these technologies are full of cultural preconceptions or prejudices, the so-called 'biases'. Of course, this 'discovery' is not new and does not only refer to AI, but to all computer systems. As early as 1996, Friedman and Nissenbaum (1996) identified three types of biases in computer systems: pre-existing biases (inherent in the humans who design computer systems and in the cultural context that influences the design); technical biases (the scarce resources and technical limitations that often characterise the development of computer systems); and emergent biases (society is constantly evolving, so technologies designed in a specific time and cultural context may become biased in a different time and context).

Children interact with domestic technologies that are full of cultural and social biases, so we need to think about what kind of values these technologies can transmit to our children. These questions come to the fore when we consider how technologies like Alexa and Google Assistant are designed to encourage and facilitate consumption. Examples of how these technologies incentivise consumption can be found in the numerous articles published in the United States in which the story is told of children who had bought various consumer goods - without their parents' permission - using virtual assistants. Yet, when we think about the cultural values of these technologies we are not only talking about how virtual agents are designed to encourage consumption, but also about other deeper cultural values and preconceptions. A good example is The Smart Wife: Why, Siri, Alexa and Other Smart Home Devices Need a Feminist Reboot, by Jenny

Kennedy and Yolande Strengers (2020), where it is clearly shown how the choice of the female voice in many smart technologies is not accidental, but dictated by centuries of cultural prejudices about the role of women as "assistants".

Friedman, B., & Nissenbaum, H. (1996). Bias in Computer Systems. ACM Trans. Inf. Syst., 14(3), 330–347. https://doi.org/10.1145/230538.230561

Strengers, Y., & Kennedy, J. (2020). The Smart Wife: Why Siri, Alexa, and Other Smart Home Devices Need a Feminist Reboot. The MIT Press.

Section 4: Policy for the digital environment

What can research tell us about the most effective policy measures to date in protecting children from harmful online content?

n.a. to my research

Can the evidence show which policy measures have not worked well to date in protecting children from harmful online content?

n.a. to my research

Is there evidence available of what is working well/not working well with regard to mitigation measures to protect children from illegal content, contact and conduct, including from child sexual abuse and exploitation?

n.a. to my research

Considering the importance of multistakeholder cooperation in creating a safer environment and protecting children and young people from online challenges and risks, who should lead (EC/MS/industry/others), how can it be best supported and by whom?

See answer above about relation between independent research, academia and policy makers

Do you have any other observations regarding policy priorities and new measures needed to promote promote, protect, respect and fulfil children rights in a digital world?

I believe much more should be done to protect children's privacy. In the first place I believe we need a policy change; we need to design regulations that take into account the complexity of our current data environments; regulations that are actually able to address three main problems when it comes to children's data privacy:

1. The Coercion of Digital Participation (Barassi, 2019). We need regulations that move beyond the discourse of individual choice and individual responsibility, and actually hold businesses and organizations accountable for the technologies and data collection practices that they use. Regulations like the GDPR or the California Consumer Privacy Act 2018 stress the fact that businesses and organizations need to make their data collection practices transparent and provide consumers with the possibility to opt out or be forgotten. Yet these regulations are very difficult to implement, and the main focus of such policies is on families 'right to know' and 'right to complaint'. Families often do not have a choice, and in the majority of cases they do not have the time or resources to file complaints. These regulations are thus doing a disservice to families and children. A radical change in this area is needed. Regulations should abandon the focus on transparency and individual responsibility. What they should do is enforce 'privacy by design', and make sure that 'opt-out models' are replaced with 'opt-in models'.

2. Aggregated Profiles. A lot of children's personal data is collected, stored and processed through adult profiles or aggregated household profiles (e.g.: on social media, or home technologies), which do not have to abide to children's data privacy regulations. All the children's data, which is collected through these technologies should be deleted and not processed. New regulations should make sure that children are not be judged or profiled on the basis of the families and collectives they are brought up with, and household profiling should not be allowed.

3. The role of data brokers and the creation of unique ID profiles. The world of data brokers, data sharing agreements and digital profiling is extraordinary complex and impossible to grasp. We need to start investing in public and independent research that tackles their practices and provides useful tips on how we can regulate the sector. We also need to start challenging business models that do not understand the fallacy of algorithms when it comes to human profiling, and that stereotype and discriminate individuals on the basis of a false promise.

Barassi, V. (2019). Datafied Citizens in the Age of Coerced Digital Participation. Sociological Research Online. https://doi.org/10.1177/1360780419857734

Privacy Statement

IMPORTANT NOTICE – Please read this privacy statement carefully.

By ticking the box below, you confirm that you have read and agree to the **privacy statement** which explains the processing of your personal data in the context of this this BIK Strategy Revision targeted stakeholder consultation activity - online survey and workshop which is carried out as part of the Better Internet for Kids (BIK) Phase 4 project.

I accept the privacy statement as outlined above.

Contact

Contact Form