

FEEDBACK ON UNICEF DRAFT POLICY

GUIDANCE ON AI FOR CHILDREN

Knowledge Centre
Data & Society

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1. Introduction

This report contains the feedback following a consultation organised by the Flemish Knowledge Centre Data & Society (KCDS) on the White Paper on Artificial Intelligence (AI) issued by the European Commission (EC) in February 2020. The KCDS focuses on the interplay between data, AI and society. It enables socially responsible, ethical, and legally appropriate implementations of AI in Flanders.

The KCDS aims to enable Flemish companies, policymakers, regulators, and citizens to achieve the greatest social and/or economic benefits of AI. It brings together diverse representative organisations/stakeholders and facilitates the creation of tools, advice, and recommendations. It comprises three existing research centers: [imec-SMIT \(Vrije Universiteit Brussel\)](#), [imec-MICT \(Ghent University\)](#) and [the Centre for IT & IP Law \(KU Leuven\)](#). [The Flemish Department on Economy, Science and Innovation](#) funds the initiative.

2. General remarks

The KCDS fully agrees with the Unicef guidelines and formulates the following remarks:

- The report rightly states that children should be involved in AI policy, and in the design and development process of AI. The KCDS fully supports this recommendation but proposes to extend the participation process to include parents and teachers (even in the case of AI not intended for educational purposes). The contributions of these two stakeholders can also be very valuable for the policy and design process of AI.
- The use of AI systems in education is an important current topic. Governments should be aware of the importance of educating children and young people about AI from an early age. The report contains a recommendation to use AI systems in education when appropriate. There should be sufficient evidence that AI has added value, and the use of AI should not pose a risk. The latter condition is a rather broad and vague formulation, which can cover a wide range of issues.

The KCDS would like to add that if AI is used in education, it should unconditionally support the educational process (the process in which the pupils acquire knowledge and skills) and it should have a pedagogical added value. Moreover, technology must not undermine the child's agency (the ability to make free choices and self-regulation) and its development.

- Encouraging and stimulating cooperation between businesses and educational institutions is an important recommendation. One element that should be emphasised more explicitly is the inclusion of educational institutions and especially teachers. The added value of AI in education will not only be created by technology, but also depends on the extent to which teachers are able to work with technology.

That is why it is important that teachers are invited in the design process of AI technology for educational purposes.

- The recommendation on data agency is fairly general. The recommendation could be deepened by, for example, encouraging service providers using AI, such as social media platforms or application providers, to adapt their data protection policies as soon as a substantial number of their users are children.
- The description of the recommendation 'Follow a responsible data approach for the act of data for and about children' lacks in clarity. The KCDS recommends a clearer formulation, more specifically that the right to data protection should not impede access to AI. The right of participation must therefore continue to be guaranteed.

3. Concluding remarks

In this report the Knowledge Centre Data & Society provided feedback on the Policy Guidance on AI for Children Draft, issued by Unicef in September 2020. We believe that a coordinated supranational approach to the many benefits and challenges created by AI-systems is necessary. We look forward to the publication of the revised report and hope to further collaborate on establishing a proper (regulatory) framework on AI.