

# Informing Age-Appropriate AI: Examining Principles and Practices of AI for Children

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## ABSTRACT

AI systems are becoming increasingly pervasive within children’s devices, apps, and services. However, it is not yet well-understood how risks and ethical considerations of AI relate to children. This paper makes three contributions to this area: first, it identifies ten areas of alignment between general AI frameworks and codes for age-appropriate design for children. Then, to understand how such principles relate to real application contexts, we conducted a landscape analysis of children’s AI systems, via a systematic literature review including 188 papers. This analysis revealed a wide assortment of applications, and that most systems’ designs addressed only a small subset of principles among those we identified. Finally, we synthesised our findings in a framework to inform a new “Code for Age-Appropriate AI”, which aims to provide timely input to emerging policies and standards, and inspire increased interactions between the AI and child-computer interaction communities.

## CCS CONCEPTS

• **General and reference** → **Surveys and overviews**; • **Human-centered computing** → **HCI theory, concepts and models**; **Empirical studies in HCI**.

## KEYWORDS

AI for children; age appropriate design; systematic literature review

### ACM Reference Format:

Ge Wang, Jun Zhao, Max Van Kleek, and Nigel Shadbolt. 2022. Informing Age-Appropriate AI: Examining Principles and Practices of AI for Children. In *CHI Conference on Human Factors in Computing Systems (CHI '22)*, April 29-May 5, 2022, New Orleans, LA, USA. ACM, New York, NY, USA, 29 pages. <https://doi.org/10.1145/3491102.3502057>

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CHI '22, April 29-May 5, 2022, New Orleans, LA, USA

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ACM ISBN 978-1-4503-9157-3/22/04...\$15.00  
<https://doi.org/10.1145/3491102.3502057>

## 1 INTRODUCTION

AI algorithms are starting to play a variety of roles in the digital ecosystems of children - being embedded in the connected toys, apps and services they interact with on a daily basis [3, 140]. Such AI systems provide children many advantages, such as personalised teaching and learning from intelligent tutoring systems [50, 110], or online content monitoring and filtering algorithms that proactively identify potentially harmful content or contexts before they are experienced [81, 137]. AI systems in games and entertainment services provide personalised content recommendations [56], while social robots power the interactive characters in ways that make them engaging and human-like [33, 80]. Going forward, AI systems will, in all likelihood, become altogether even more pervasive in children’s applications simply due to their sheer usefulness in creating compelling, adaptive, and personal user experiences [9]. Such systems also could play a role, for instance, in making systems more inclusive and accessible, as researchers explore ways systems might be made sensitive and adaptive to children’s specific needs and abilities [1, 27]. Yet, despite its enormous potential, the use of AI comes with new kinds of risks, some of which were of particular concern for children. Examples include potential bias against certain groups [39, 69], that cause systems to treat those in different socioeconomic or ethnic groups differently might psychologically or socially impact children disproportionately in their formative years [3, 140]. Similarly, inscrutability and unpredictability could inadvertently cause children to be exposed to harms in content filtering systems in ways that were difficult to anticipate or predict, such as those crafted by malicious adversaries [3]. Moreover, children are among those at greatest risk of privacy-related harms due to the fact that data collected about them could affect them throughout the lifetimes they have yet to live [4].

Yet, understanding the ways that AI-systems are being used in systems for children, and their harm and impact is still a new and emerging area of investigation. On one hand, there exists a growing body of literature (including research findings, codes of practice, and proposed legislation) characterising such AI harms across many kinds of applications (e.g. the White House’s Guidance for the Regulation of Artificial Intelligence [8], and the EU’s proposed Artificial Intelligence Act [13]); and on the other, there is a complementary body of literature focusing on risks to *children*, which similarly includes primary research, proposed policies, and codes of practice, such as the UK ICO’s Age Appropriate Design

Codes [4] and the UNICEF's AI policy for children [140]. These diverse efforts have created a confusing outlook for designers and practitioners to create concrete and safe designs for children.

This paper examines the intersection of these two areas, and situates these regulatory developments against recent research and development of AI for children, with the aim of contributing an understanding of what sorts of AI design principles are relevant to children in systems available today. We first compare frameworks describing principles for ethical, safe, and trustworthy AI, with those for age-appropriate design for children, identifying significant areas of overlap and ten common principles that we interpret in the context of child-centred AI. To see how these principles relate to existing AI systems for children, we conduct a landscape analysis through a systematic literature review of AI systems for children, constructing a high-level overview of key systems and their characteristics, including their target audience, application domains, computational methods used, and kinds of data processed. We further identify, for each reviewed AI system, their theoretical and empirical groundings, involvement of multi-stakeholder, and evaluations methods, and mapped these against the design principles outlined by the existing frameworks. The contributions of this paper are three-fold: 1) drawing a clarification of the overlaps among the leading regulatory efforts for safe and ethical AI for children, 2) providing a landscape analysis of AI systems for children, and 3) a synthesised framework to inform a new "Code for Age-Appropriate AI", which aims to provide timely input to emerging policies and standards, and inspire increased interactions between the AI and child-computer interaction communities.

Our analysis enabled us to gain an increased clarity of existing AI regulatory frameworks and the practical design landscape of current AI systems for children. We found the implementation of the ten regulatory design principles are often localised to a small subset overall, and largely within particular AI applications for children. Furthermore, we also noted that various aspects of the designs of current systems were grounded in, or guided by, theoretical and empirical work from specific application domains, which are not covered in the existing regulatory frameworks. This mismatch between the regulatory frameworks and existing implementations raises the open question about future approaches for developing child-specific AI regulatory frameworks: whether a framework across all application domains is needed, and if so, how this may present an opportunity for bringing together domain-specific expertise to ensure a multi-dimensional safeguarding of children in future AI systems.

## 2 BACKGROUND

### 2.1 AI for Children: Scope and Definition

To establish the scope of our investigation we first aim to define what we mean by "AI for children". Starting with "AI", the OECD's *Recommendation of the Council of Artificial Intelligence* defines AI systems as "machine-based systems that can, given a set of human-defined objectives, make predictions, recommendations, or decisions that influence real or virtual environments" [148]. This definition is cited by the proposed EU *Artificial Intelligence Act* (EU-AIA) [13], as well as the 2020 UNICEF *Policy Guidance for AI for*

*Children* [140] and offers a convenient definition that remains independent of particular implementation or application. With respect to "AI system", however there is some divergence among common use; some papers use the term "AI system" to mean the particular algorithm or subsystem that enables a particular AI-associated capability (e.g. learning, inference, or recommendation), while others consider a broader context, namely those components that enable a specific application-specific capability (e.g., voice recognition, face recognition, video content recommendation). In other contexts, an "AI system" refers to end-user systems that have such capabilities embedded within them (e.g. intelligent tutoring systems [62]). In this paper, we adopt the latter two, considering both the specific capabilities and entire end-user systems as AI systems.

With respect to "for children", the aforementioned UNICEF policy guidance identifies three potential scopes: systems that were explicitly designed *for children* (but not necessarily have to be used by children), systems that *children interact with* (not specifically designed for children but could be accessed by them), and most broadly, systems that may *impact children* [140]. In this paper, we focus primarily on systems designed for children, as we see this as the best starting place for discussing what it means by better AI design *for children*.

### 2.2 HCI Research on Designing AI for Children

The recent roadmap of the Child-Computer Interaction SIG [22] identifies AI for children as one of the key emerging areas of research, as children may perceive such technology differently from adults. This critical time of change calls for some immediate, deep thinking about future design of AI for children, to ensure their safety and their experience of fairness. However, the roadmap also acknowledged that we do not yet have a good understanding of the way children comprehend the function of AI-based technology and the implications of these technologies on their lives and behavior. A growing body of research has been carried out by the HCI community regarding how AI-based technologies or systems are perceived by children of different age or background. For example, Williams et al [144] engaged with pre-school children to assess their perception of an AI-based social robot and their learning outcomes. One of the key questions explored by the community is how children connect with the non-living, AI-based systems, which may have a physical representation [83, 107, 126] or sometimes not necessarily [90, 147]. AI and fairness are also explored, e.g. Skinner et al [128] involved children from disadvantaged background to explore their perception of the fairness of AI-aided library system, and Hitron et al [66] evaluated how children may be capable of interpreting machine learning building blocks. These increasing understandings indicate a great need of carefully approaching the design of AI systems for children, as children's inclination of regarding these systems as part of their natural habitat and children of different background may be exposed to particular risks or unfairness from their early childhood.

Although there has not yet been extensive discussion in the HCI literature about designing AI for children in general, the HCI community has extensive research expertise regarding designing with/for children [45, 54, 133], and contributed many individual

examples of human-centred systems for children that have AI-associated capability, across a variety of application domains – from teaching and learning, to online safety, to entertainment and beyond. For instance, the application of sensing children’s classroom interaction or attention has been widely explored and AI-based technologies are deemed to provide more adaptive or personalised learning support [44, 70, 122]. Although the focus of these approaches is to improve children/students’ learning experiences or outcomes, the implications of deploying such technologies in the learning context have been less considered. AI has also been often explored to support children with various degrees of disability [91, 100] or learning difficulties [55, 59]. Although these developments focused on achieving better user experiences through AI technologies, they have provided less systematic thinking regarding how best to design AI systems for children, e.g. respecting their best interests or age-specific needs etc.

In fact, research around design principles on AI for children is still at its infancy [10]. Nevertheless, there has been some exciting work focusing on specific applications and design principles for specific domains. For instance, Saxena et al.’s [123] research on algorithms used with the U.S. children welfare system, through a systematic literature review, argued for more “context-aware” systems rather than purely “risk-based ones”. Erel et al. conducted a series of interviews with children to identify how to better design AI-enabled smart-home technologies in children’s bedrooms settings, and they found that children wanted technologies to support them emotional needs, not just for utility purposes [49]. Frauenberger et al took a theory-driven approach to develop methods for co-designing ‘future’ smart objects with autistic children [55]. In a recent report published by KidRec2020, a “good” recommender system for children is proposed to be with resources that foster learning, user-centered, engaging, and ethically sound and supports children’s rights [82]. These domain-specific research marks the first step towards a more systematic thinking on how to design more age-appropriate AI for children.

### 3 ANALYSIS OF FRAMEWORKS ON AI AND FRAMEWORKS FOR CHILDREN

There has been increasing effort made on attempts to regulate for more responsible AI. Regulatory frameworks have emerged that attempt to systematically characterise risks relate to AI technologies and establish methods by which risks might be identified and mitigated. A UNICEF review of 20 national AI strategies in 2018 has shown that very little attention has been explicitly given to safeguarding the rights of children in an algorithmic-oriented economy and society [10]. Meanwhile, a separate branch of work has focused on more specifically guiding AI (or digital) technologies for children. The two branches of work were separate but related, and sometimes they touched on similar topics but in different ways. There is therefore this confusing smorgasbord of different frameworks and guidelines relating to somewhat overlapping concerns. This can make it difficult for designers and practitioners to effectively establish concrete design suggestions and standards [3]. In order to gain some clarity on how these two sets of framework developments relate to AI systems for children, we present a review comparing the two.

#### 3.1 Data Collection and Analysis

Three AI regulatory frameworks are selected for this purpose as they are the only ones across the world with (or close to) regulatory powers at the time of writing:

- **EUAIA** - *The EU Artificial Intelligence Act* [13]: In 2021, the EU proposed artificial intelligence (AI) regulation that applies to any company that develops or wants to adopt machine-learning-based software with EU market exposure. It sets up a series of escalating legal and technical obligations depending on whether the AI product or service is classed as low, medium or high-risk.
- **GRAIA** - *A White House Memorandum on “Guidance for Regulation of Artificial Intelligence Applications”* [8]: In 2020, the White House issued a memorandum providing guidance to federal agencies to consider when developing regulatory approaches to artificial intelligence (AI) applications.
- **ATI** - *Alan Turing Institute’s Guide for the responsible design and implementation of AI systems in the public sector* [85]: Although not strictly with regulatory status, this framework is recommended by the UK government as an important guidance on the ethics and safety in the development and implementation of AI tools [5].

Apart from the AI frameworks, we also include three leading frameworks on regulating and guiding AI/digital technologies for children, two of which as legally-binding documents:

- **UNICEF** - *Policy guidance on AI for children* [140]: In 2019, the UNICEF developed a draft policy guidance on AI for children. This document remains a voluntary guidance for self-enforcement at the moment, and aims to promote children’s rights in government, whilst informing private sector AI policies and practices, and raising awareness of how AI systems can uphold or undermine these rights.
- **AADC** - *Age Appropriate Design Code* [4]: In 2020, the UK ICO published its final Age Appropriate Design Code – a set of 15 standards that online services should meet to protect children’s privacy. The legally-binding document sets out the standards expected of those responsible for designing, developing or providing online services that are likely to be accessed by children.
- **UNCRC** - *General comment No. 25 (2021) on children’s rights in relation to the digital environment* [7]: In 2021, the UN Committee on the Rights of the Child officially launched their new General Comment No. 25 on Children’s rights in relation to the digital environment. The adoption of this General Comment signals the first time that children’s digital experiences are mentioned within the UN Convention on the Rights of the Child (CRC) as a **legally-binding** statement.

We applied a qualitative analysis process to these six frameworks. Each framework can be organised in different ways, by subsections, principles or chapters, which provides a broad indication of their structures. The first author read through each subsection/chapter to identify specific and distinctive principles (similar to ‘themes’ in the thematic analysis [32] methodology) discussed in each framework. We recognised that these principles may be named and defined differently in each regulatory framework. By reading through the definitions from each framework and consulting our in-house legal

scholar, we consolidated the diverse definitions and terminologies across the different frameworks into 10 common principles, with different degrees of engagement of children's issues. Three co-authors then reviewed and discussed the principles, drawing on their experience on responsible AI research and regulations of children's technologies. For each identified common design principle, we then concretely identified and extracted the issues specifically around children (Figure 1).

### 3.2 Ten Design Principles

The purpose of this analysis is to identify how two sets of framework developments overlap and how child-specific AI are being currently discussed. Our result shows that (see Figure 1) although there are overlaps amongst the frameworks from various legislation background, limited consideration has been given to child-specific challenges and needs from the AI frameworks. This is in line with the previous UNICEF AI strategy review [10]. However, in our review, we see much more explicit attention has been given to safeguarding the rights of children in the more recent frameworks for regulating digital environments for children, which are largely missing in general AI regulations.

**I. Fairness and non-discrimination.** It is recognised that there can be different ways to characterise or define fairness in the design and use of AI systems. The ATI proposes that the *principle of discriminatory non-harm* should be a minimum required threshold of fairness - requiring designers and users of AI systems to ensure that the decisions and behaviours of their models do not generate discriminatory or inequitable impacts on affected individuals and communities (p15. [85]). This also corresponds to one of the fundamental principles outlined in the EUAIA for prohibiting any systems that may involve “*detrimental or unfavourable treatment of natural persons or whole groups that is disproportionate or unjustified*” (p44. [13]). Although ATI makes an explicit mention of “*parents and guardians*” (p72. [85]), EUAIA and GRAIA make no specific mention. The UNICEF urges explicitly to “*support marginalized children*” and suggests to “*develop datasets so that a diversity of children's data are included*” and to “*eliminate any prejudicial bias against children*” (p30. [140]). The UNCRC makes a similar request to the state parties to ensure that “*all children have equal and effective access to the digital environment*”, regardless of their “*sex, disability, socioeconomic background, ethnic or national origin, language or any other grounds*” (p2. [7]).

**II. Accountability.** The principle is defined in the ATI as built upon two sub-components: the answerability - “*to establish a continuous chain of human responsibility across the whole AI project delivery workflow*”, and “*auditability*” - “*able to justify the answers to questions of how the designers and implementers of AI systems are to be held accountable*” (p24. [85]). The EUAIA is the only general AI framework that emphasises the importance of extra attention paid to systems that could be assessed by children, in particular, the importance of impact assessments (p9. [13]). Both the UNICEF and UNCRC urge for “*constant review, update and refine to integrate child rights*” (p34 [140]). In the AADC, a series of data protection impact assessments (DPIAs) are set for auditing and mitigating possible risks to the rights and freedoms of children. The DPIAs are “*a key part of service providers' accountability obligations under the*

*GDPR*” (p28. [4]), and help service providers to effectively assess and document their compliance.

**III. Sustainability.** Sustainability is formally defined in ATI as “*designers and users of AI systems should remain aware that these technologies may have transformative and long-term effects on individuals and society*” (p26. [85]), and usually refers to “*environmental sustainability*” (p36. [13]) in EUAIA. However, when put under child-specific context, the concept is contextualised by UNICEF as systems that have long-term effects on children, supporting their “*long term development and well-being*” (p28 [140]). The UNICEF calls for “*prioritising AI systems that can benefit children, and make use of existing well-being frameworks and metrics as a primary success criterion*” (p28 [140]). Similar statements are also found in AADC and UNCRC. Specifically, the UNCRC mentions how special attention should be paid to “*the effects of technology in children's earliest years of life, and to support relationships with parents and caregivers, which is crucial for “shaping children's cognitive, emotional and social development*” (p3. [7]).

**IV. Transparency.** This principle is defined in the GRAIA as allowing “*non-experts to understand how an AI application works*”, and “*technical experts to understand the process by which AI made a given decision*” (p6. [8]). As for child-specific transparency, all three children frameworks brought forward the idea of using *child-friendly language* to improve the understandability of information given. The UNICEF also discussed the importance of enabling “*caretakers of children and those around them*” to understand how systems would have impact on children (p33 [140]). The AADC adds on to the principle by suggesting making the information “*easy to find and accessible for children*” (p38 [4]). The UNCRC further urges to provide children with “*training opportunities on how to effectively articulate the AI systems*” (p10. [7]).

**V. Privacy.** All three AI frameworks urge providers and developers to respect for users' privacy, some through *technical means* as *pseudonymisation, or encryption where anonymisation may significantly affect the purpose pursued*” (p48. [13]). The frameworks also emphasised on “*improper consent of collected data, and improper handling of personal data*” (p5. [85]). As for child-specific data privacy, the AADC made extensive effort on regulating data practices for children, including “*default privacy settings on systems that could be access by children*”, retaining only “*the minimum amount of children's personal data that is needed*”, and not sharing personal data of children if can “*reasonably foresee that sharing with third parties could lead to detrimental effects on children*” (p7. [4]). The UNCRC also mentions that “*any digital surveillance of children should not be conducted routinely, indiscriminately or without the child's knowledge*” (p13. [7]).

**VI. Safety/Do No Harm** Here safety refers to the “*accuracy, reliability, security and robustness*” of an AI system (p30. [85]), and that “*developers should prioritise the safety and the mental and physical integrity of people when deploying AI applications*” (p11. [13]). As for the children frameworks, the Safety of AI is contextualised with children's unique characteristics. The UNICEF explicitly elaborates that “*children are biologically and psychologically distinct from adults, and more importantly “can use digital services and apps in unanticipated ways”*” (p32. [140]). This requires AI systems to put in special considerations on the specificities of children when ensuring the safe use of AI.

COMMON PRINCIPLES	CHILD-SPECIFIC CONSIDERATIONS					
	AIA	GRAIA	ATI	UNICEF	AADC	UNCRC
<b>1.Fairness &amp; Non discrimination</b>	–	–	"parents and guardians should be treated fairly"	"Support marginalised children" "Develop diverse child datasets" "Eliminate prejudicial bias"	–	"All children to have equal access" "prevent discrimination of the basis of sex, disability, ethnic..."
<b>2.Accountability</b>	"Specific assessments on systems could be assessed by children"	–	–	"Review, update and develop AI-related regulatory frameworks" "Mechanisms for redress"	"DPIAs"	"Regular audits and accountability measures"
<b>3.Sustainability</b>	–	–	–	"Support children's long-term development and well-being"	"Support children's physical, psychological and emotional development"	"Special attention on the effects of technology in children's earliest years of life"
<b>4.Transparency</b>	–	–	–	"Use child-friendly language" "Support caregivers to understand"	"Information easy to find and accessible for children" "a child-friendly way"	"support and training opportunities on how to effectively articulate the AI system"
<b>5.Privacy</b>	–	–	–	"A responsible data approach" "Promote children's data agency" "Privacy-by-design"	"Default privacy settings on services could be assessed by children" "Data minimisation" "Do not disclose children's data"	"Any digital surveillance of children should not be conducted without the child's knowledge"
<b>6.Safety/Do not Harm</b>	–	–	–	"Children can use digital services and apps in unanticipated ways"	–	–
<b>7.AI for safeguarding /Protect from Harm</b>	"Develop AI to address crimes against children"	–	–	"Leverage AI to protect children"	"AI to protect children from potential harms"	"Protect children from harmful and untrustworthy content"
<b>8. Exploitation and manipulation</b>	"AI could exploit vulnerabilities of children"	–	–	"Continuously assess and monitor AI's impact on children"	"Do not use children's data in ways that are detrimental to their wellbeing"	"Extra attention on systems that affect or influence children's behaviour or emotions"
<b>9.Ensure inclusion of and for all</b>	–	–	–	"Ensure all children can use AI regardless of age, gender, geographic and cultural diversity" "Support child participation"	"Agency that allow children to form their own views and have them heard"	"Promote means for children express their view, and support for children to participate on an equal basis with adults"
<b>10.Meet developmental needs</b>	–	–	–	"AI informed by the unique developmental stage of children"	"Appropriate for children's use and meet their development needs"	"Consider the evolving capacities of children"

**Figure 1: Ten common principles derived from a thematic analysis of the 6 frameworks for trustworthy and ethical AI (EUAIA, GRAIA, ATI), and age-appropriate design (UNICEF, AADC, UNCRC). The child-specific considerations for each identified principle mentioned in each guidance are indicated. The cells in light grey indicate that the principle has been discussed for the broad population but not for children specifically; The cells in white indicate no discussion about that principle in that framework at all.**

**VII. AI for safeguarding/Protect from Harm** This principle states that AI systems should be designed and applied to proactively (and semi-automatically) protect users from harms, be they online and offline. This principle is extensively brought up in the frameworks for children; the AADC, for instance, notes down a list of potential harms that AI systems could protect children against, including "physical harm, online grooming, access to harmful or inappropriate content, excessive screen time" etc (p30. [4]). The UNCRC further elaborates on how the digital environment can include "gender-stereotyped, discriminatory, racist, violent, pornographic and exploitative information" (p9. [7]). The UNCRC urges for development of AI systems that could protect children from these harmful and untrustworthy content, and ensure their right to freedom and expression under sufficient protection.

**VIII. Avoidance of exploitation and manipulation in targeting and personalisation** Both sets of frameworks discuss the application of AI to data-driven personalised targeting techniques and the potential harms such techniques could have when applied in various contexts. For instance, the EUAIA explicitly prohibits AI systems that target individuals to cause *physical or psychological*

*harm*, including systems that *deploys subliminal techniques beyond a person's consciousness or exploits their vulnerabilities in order to materially distort a person's behaviour* (p12. [13]). UNICEF urges for "continuous assessment and monitoring on AI's impact on children", especially for those involving personalised targeting, even while the same AI systems may be beneficial to other groups (p32. [140]). The UNCRC also calls for increased scrutiny of AI systems that could "affect or influence children's behaviour or emotions" (p11. [7]). Apart from these, the AADC lists some concrete examples of behavioural manipulation to avoid, including "using personal data in a way that incentivises children to stay engaged, such as offering children personalised in-game advantages", nudging children to continue to play or keep engaging by "suggesting that children will lose out if they don't", or profiling children's personal data to "make inference about them by exploiting their vulnerabilities" (p46. [4]).

**IX. Ensure inclusion of and for all.** This principle is defined in ATI as "encourage all voices to be heard and all opinions to be weighed seriously and sincerely" (p10. [85]), and is more often brought up in the children frameworks. The UNICEF argues for ensuring the "diversity amongst those who design, develop, collect and process data,

*implement, research, regulate and oversee AI systems*”, and supporting the *“meaningful child participation, both in AI policies and in the design and development processes”* (p28. [140]). The AADC also encourages *“agency that allow children to form their own views and have them heard”* (p24. [4]). Similarly, the UNCRC requires state parties to *“promote means for children express their view, and support for children to participate on an equal basis with adults”* (p3. [7]).

**X. Meet developmental needs.** The UNICEF states that “the developmental stages and different learning abilities, need to be considered in the design and implementation of AI systems” (p6. [140]). The term “developmental stage” is also stressed in the UNCRC. The framework encourages state parties to respect the *“evolving capacities of children as an enabling principle that addresses the process of their gradual acquisition of competencies, understanding and agency”* (p4. [7]). The AADC gives some explicit examples on how “developmental needs” could be achieved under the context of transparency. Systems are required to *“tailor the content and presentation of the information according to the age of the user”*, the framework also argues against a *“one-size-fits-all”* approach that does not recognise that children have different needs at different stages of their development (p39. [4]).

## 4 LANDSCAPE ANALYSIS OF AI SYSTEMS FOR CHILDREN

In Section 3, we have distilled ten common design principles from the AI and child-specific frameworks. But what about existing AI systems for children? How are things done in practice? A systematic literature review is conducted to identify how AI has actually been applied for children; and whether, and how these principles were addressed in existing systems developed for children.

To achieve this, we followed the methods used in previous literature reviews [1, 135]. We started with identifying a group of keywords to be used for the literature search, the sources for our literature search, and the inclusion/exclusion criteria.

### 4.1 Data Collection and Analysis

**Data Collection.** The unit of analysis for this literature review was peer-reviewed articles in CS-related venues. The aim was to identify articles that described the design or evaluation of AI systems intended for use by children. At the start, we experimented with different keywords combinations related to our research topic, and we identified the final set of keywords which gave us the best matching set of literature for further analysis.

We used and combined the following primary and secondary terms for our search. The primary terms were “application” or “system” or “AI” or “artificial intelligence” or “algorithm”. The secondary terms were “child” or “children” or “kid” or “teens” or “teenager”. The primary and secondary terms were combined and searched in abstracts. We carried out the same search queries in ACM digital library and IEEE Xplore. These two libraries are defined to be the most relevant databases as our purpose was to focus on the technical details of each AI applications. We chose to focus on literature that was published over the last 10 years. Applications of AI for children is a fast-changing area, and so are the regulations in this space. However, research and discussion around it have started

since 2011 when UNICEF published its ‘Save the Children: Children’s Rights and Business Principles Report’ [141], emphasising children’s fundamental rights when designing for them. Therefore, we believe 10 years is a reasonable time span to reflect on both the more recent practices as well as the more established AI practices and their underlying design ideologies. We only included full peer-reviewed research papers. This resulted in 870 papers from ACM digital library and 1027 papers from IEEE Xplore. We then conducted a more thorough manual elimination process to only selected the papers that were specifically describing an application of AI for children in detail. Our screening criteria is as follows:

- Publications that’s about AI systems for children - here we used OECD’s definition for AI systems as “machine-based systems that can, given a set of human-defined objectives, make predictions, recommendations, or decisions that influence real or virtual environments” [148].
- Publications that engaged in a technical discussion about how AI systems have been designed and evaluated in different parts of children’s everyday lives.

The first author carried out the manual screening throughout all the search results by skimming through each of the papers. Out of the 1897 collected papers, 483 of them did not talk about a specific application/system developed for children, 702 of them were not AI-enabled, another 341 of them did not engage in a technical discussion, 157 papers were found to not have done evaluation process for the introduced AI system, and another 26 papers were found not to be full papers. The final dataset was scrutinized by both the first and second author together to reach consensus. This yielded 188 papers (87 papers from ACM, 101 papers from IEEE) for our study.

**Data Analysis.** We then conducted an analysis on the final filtered set of papers, addressing our two research questions: R1). *Deriving an AI landscape* - How AI technologies have been applied for children, and R2). *Mapping the AI landscape with frameworks* - Whether and the means through which researchers addressed the principles identified in Section 3.

Specifically, for R1, we contextualise the AI landscape through a broad taxonomy of 1). *target audience* - age and recruitment purpose of children, 2). *application domains of AI* - the domains in which AI technologies have been applied for children, 3). *the computational methods used*, and 4). *the data processed across application domains of AI*.

For R2, we tried to identify whether and the means through which researchers addressed the design principles in Section 3. Here, we used the Human-Centred Algorithm Design framework (HCAD) as a lens to help us identify such *means*. The HCAD proposed three human-centred design strategies for designing algorithmic system, namely: theoretical, participatory and speculative [28]. We draw from these three strategies to guide our analysis on the *means* of existing AI systems for children: 5). *theoretical/empirical groundings* - if and what kind of theoretical/empirical groundings were considered, 6). *multi-stakeholder involvement* - if and how stakeholders, including children themselves and those around them, were involved, 7). *speculative engagement* - if and how designers used



speculative methods [47] to understand needs and attitudes to technologies, and finally, 8). *evaluation* - what and how evaluations were made. Guided by this categorisation, we read through all 188 papers from each domain and for each paper, generated codes under each of the four categories of *means* mentioned above. The codes were then mapped to the ten framework design principles. For example, a paper was considered to have addressed the principle of *fairness & non-discrimination* if it, for instance, conducted an *evaluation* of system bias ([code: evaluation:bias]) or used some empirical or theory-led findings to mitigate a specific fairness issues in its design ([code: empirical/theoretical: fairness]). See Appendix B for a complete codebook.

During the coding process, the first author and the second author independently coded 11% of the collected papers (20 papers) and reached consensus on an initial codebook. The first author then used that initial codebook to code for another 21% of the collected papers (40 papers). All co-authors were consulted to resolve ambiguous codes to reach consensus on a final codebook. The first author then continued to code the rest of the papers.

## 4.2 AI Landscape: A High-level Overview on AI systems for Children

Here, we present the results of our landscape review of AI technologies in systems for children, conducted via a systematic literature review. Our objective was to generate a high-level analysis of how AI in systems for children were being applied, including *target audience*, *application domains of AI*, *computational methods used*, and *types of data processed*.

**4.2.1 Target audience.** The review of papers from the past ten years showed that an extensive number (84 papers out of 188) of AI systems were developed for the children, without specific target user groups (Table 1). On the other hand, there still have been various types of AI systems developed specifically for children of different age groups and of different needs. The most represented age groups among the reviewed papers were preschoolers (2-5) and young children (6-12), whereas fewer systems have been targeted at infants (0-1) or teens (13-18). In terms of children with special needs, a considerable number of paper (23 papers) aimed at developing AI systems for children with physical special needs, which includes children with speech/hearing impairment (12 papers), children with visual impairment (1 paper), children with motor disabilities (7 papers), and children with other health issues (3 papers). Even more papers targeted children with developmental special needs (40 papers), among which more than half of them were dealing with children with Autism Spectrum Disorder (25 papers). Other papers include children with learning disabilities (2 papers), depression (2 papers), and mental disorders (8 papers). Apart from special needs of these two categories, another 6 papers focused on children under social disadvantages including being put under the welfare system (4 papers), from low income families (1 paper) and under social risks such as bullying (1 paper).

**4.2.2 Application domains of AI and computational methods used.** In this section, we discuss how AI technologies have been applied for children under a variety of different contexts. We organised

Age	Nr.	Special Needs	Nr.
0-5 (Preschoolers)	22	physical special needs	23
6-12 (Young children)	19	developmental special needs	40
13-18 (Teens)	6	socially disadvantaged	6
Unspecified	141	Unspecified	119

**Table 1: Target user groups for the reviewed papers. See Table 5 in Appendix for a detailed summary of target users in the reviewed papers with paper references.**

the applications of AI into 9 domains along *personalised tutoring/intervention*, *medical diagnosis*, *harms & safety*, *social robotics*, *personalised entertainment*, *public services*, *speech recognition*, *emotion recognition* and *age recognition*. An application of AI is often built up upon multiple computational methods. We believe by reporting the specific methods in addition to the application domains, our landscape analysis would provide readers with a more comprehensive overview on how AI has been applied in children’s everyday lives - in what application domains that AI is used and their underlying technologies. Therefore, we introduce these computational methods jointly with the application domains of AI. The computational methods were organised along *classical machine learning*, *deep learning*, *reinforcement learning*, *inferential statistics* and *rule-based models* (Figure 2).

Here *classical machine learning* refers to algorithms that parse and learn from data, and make informed decisions based on what it has learned (e.g. supervised learning, unsupervised learning) [74]; *deep learning* refers to those structures algorithms in layers to create an “artificial neural network” that can learn and make intelligent decisions on its own [61]; *reinforcement learning* is a type of machine learning technique that enables learns through trial and error, by using feedback from its interaction with the environment [136]; *inferential statistics* make use of data analysis to infer properties of an underlying distribution of probability. Its main difference with machine learning is that instead of making predictions, its main purpose is to infer about the relationships between variables [89]. Finally, *rule-based systems* apply human-made rules to store, sort and manipulate data [64].

As shown in Figure 2, the most dominant application domain of AI for children was *personalised tutoring/intervention* systems (35%) - with 27 papers on AI systems of pure educational purpose such as generating personalised learning contents for children e.g., [18, 105, 129] or assessing children’s learning outcomes e.g., [131, 132]; 14 papers on AI systems that support physical well-being of children e.g., [65, 150]; and another 26 papers on AI systems that support cognitive development, such as scheduling personalised strategies to promote children’s physical/cognitive development e.g., [42, 103, 110]. Classical machine learning methods were found in the majority of these applications (45%), followed by deep learning (15 papers) and rule-based systems (17 papers).

The second most dominant area of AI for children was the *medical diagnosis* systems (22%), with 36 papers making early diagnosis of disabilities and cognitive disorders, and the remaining 6 papers identifying children at risk of diseases. A striking amount of work (21 out of 36 papers) has been done specifically for early diagnosis of autism spectrum disorder (ASD) e.g., [98, 99, 153]; and other

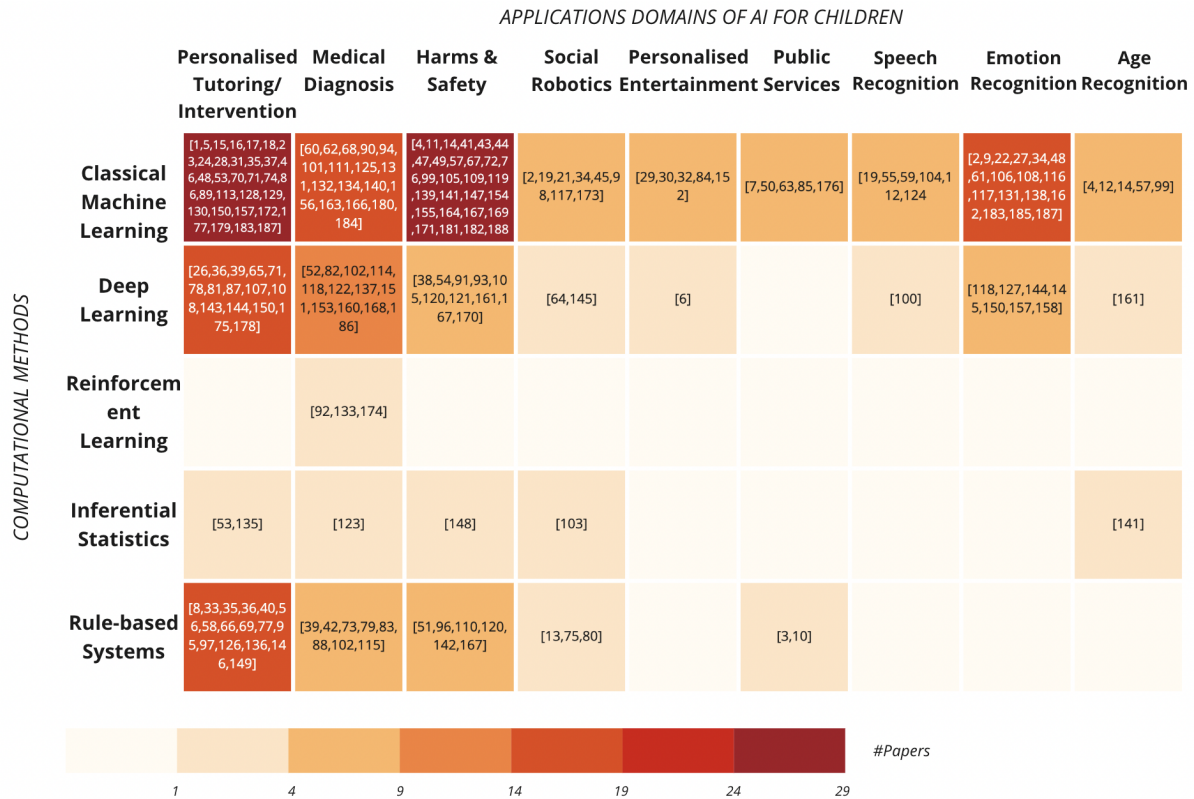


Figure 2: Application domains of AI and Computational Methods Used (See Appendix A for the complete paper list)

work includes identifying early signs of disorders such as speech disorder e.g., [24, 114, 127] and learning disorders e.g., [36, 78, 130]. Classical machine learning methods (17 papers) were the most utilized computational methods, followed by deep learning (11 papers) and rule-based systems (8 papers).

The third most dominant area of AI for children was AI applications that protect children online and offline (21%). Throughout these research efforts, different kinds of online harms were targeted. The most addressed online harm was online inappropriate content (16 papers) e.g., [76, 137], followed by cyber bullying and harassment (12 papers) e.g., [17, 40, 108], and detecting crimes against children (8 papers) e.g., [23, 93]. The remaining 9 papers focused on privacy (4 papers) e.g., [86, 151] and safeguarding children physically e.g., [52, 153]. Again, classical machine learning methods were most exploited (25 papers), followed by deep learning (9 papers) and rule-based systems (6 papers).

A fair amount of research effort has been made on building social robotics (13 papers) - AI driven systems that were designed to engage with or build a relationship with children [46]. Systems were designed to generate personalised chat topics thus to communicate with children e.g., [31, 145], or react differently according to the emotional states of children e.g., [16, 33]. Others were designed to actually physically interact with the children e.g., [80], or to convince the children that they were another human (peers, students or teachers) through imitating human behaviours such as learning

or gaming e.g., [34, 68, 73, 155]. Again, classical machine learning methods were used the most.

While perhaps being the most dominant AI use on the market [11], there has been relatively less research effort (7 papers) made on personalised entertainment systems for children. The majority of the papers (6 papers) focused on making personalised recommendations for children using classical machine learning methods e.g., [121, 152]. Similarly, we did not find much work on AI-enabled public services for children (only 7 papers). Public service systems here refer to the systems that exploit AI algorithms for social work around children. Typical examples include child welfare systems that decide whether a family needs support or whether a child needs to be taken away, find suitable fostering families e.g., [20, 118], or recognise children under welfare risks e.g., [21, 154].

Recognition systems accounted for a fair amount of work when applying AI for children. *Emotion recognition* systems were among the most common (12%), with a typical context of use being classrooms, educational settings, and online platforms for assessing children's attention and interests e.g., [26, 33]. An important additional application was in support of children with autism [19, 25]. The remaining 14 papers focused on designing and developing *speech recognition* systems (7 papers) and *age recognition* systems (7 papers) for children for distinguishing child and adult users of systems e.g., [37, 101, 111].



**4.2.3 Types of data processed across application domains of AI.** In this section, we examine the types of data that were processed in each of the identified AI systems. The inputs here refer to the type of data needed when actually implementing the AI systems (not just training and testing). We coded the type of data processed into two major categories - personal data and non-personal data (see Figure 3).

**Personal data.** We define *personal data* as “any information relating to an identified or identifiable natural person” [15], which contains “special category data” as defined under the GDPR (data concerning health, racial or ethnic origin, genetics or biometrics) [15], and behavioral data such as children’s searching histories and chat records. For *personalised tutoring/intervention* systems, 85% made use of children’s personal data (with 43 papers using special category data), mainly for building child records to personalise their learning experience [116, 149]. Unsurprisingly, the majority of *medical diagnosis systems* required processing personal data; 93% papers we analysed made use of personal data, mainly health data (21 papers) such as medical records [95, 125] and test results [71, 120]. Recognition systems (*speech recognition*, *emotion recognition*, *age recognition*) was another domain in which personal data was heavily used, most commonly in the form of biometric data such as images/scans of children’s faces [101] or samples of their voices [109, 119].

**Non-personal data.** The non-personal data refers to the data that “does not contain any information that can be used to identify a natural person” [53]. In our review, it was found to contain two types of data, use-case specific data and non child-specific data. The use-case specific data refers to children’s live interaction with the specific application e.g. children inputting a drawing into the system. The non child-specific data refers to the data that is not related to children themselves, such as posts and ads on social media platform. In general, it is not common for AI systems to only make use of the non-personal data (only 37 papers). Harms & safety systems accounted for most of such cases (16 papers), and this is probably because research mostly focused on the content consumed by the children, such as filtering harmful videos for children on video platforms [137, 137]. Therefore, the data of children themselves is not much needed in these systems.

### 4.3 Mapping AI Landscape with Frameworks

Here we present the results on the *whether*, and *means* through which the previously identified design principles (Section 3) were addressed in existing AI systems developed for children. As mentioned before, we used the HCAD [28] as a lens for us to identify the *means* from the theoretical/empirical, participatory and speculative aspects.

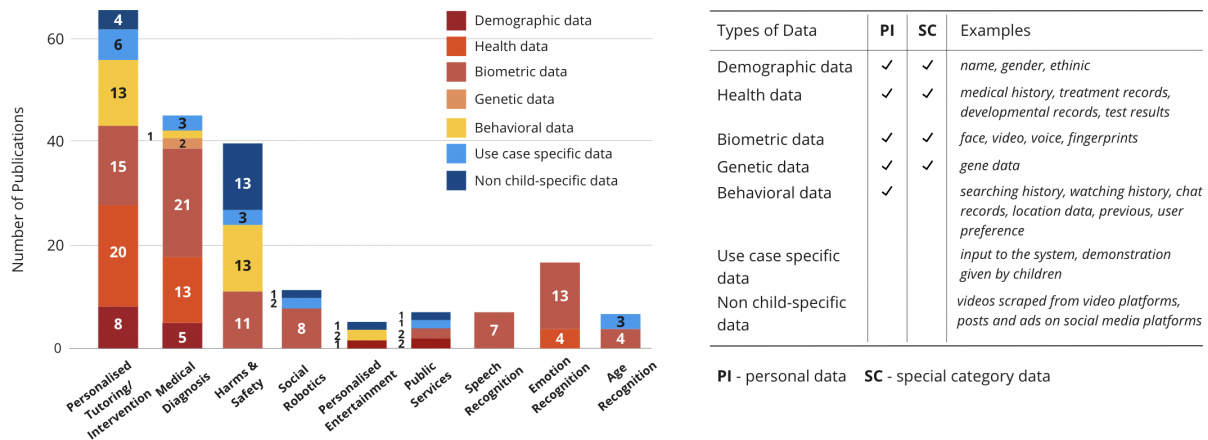
Of the total 188 papers, only 84 papers were found to have addressed any of the the design principles. We found that a fair number of papers (71 papers) have considered to base their design on some kind of *theoretical* or *empirical grounding*. Fewer papers (39 papers) included some form of *multi-stakeholder involvement* in their design and evaluation. We did not find any paper that adopted a *speculative aspect*. This is perhaps not surprising as all the papers we included in our review were of actual functioning systems. Finally, in terms of *evaluation*, we found that while all

188 papers performed some kind of evaluation, only 68 of them involved actual user-centred evaluation (i.e., lab or field studies with children), while the remaining measured system performance on representative datasets (e.g. speech recognition accuracy [127], see Appendix B for a complete summary on how each paper related to different categories (Table 4).

Table 2 depicts the mappings between the ten design principles identified from the frameworks, and if and how each design principle is considered throughout application domains of AI for children. In general, we found that papers were focused on a small number of specific concerns related to a small number of principles that were most relevant in each application domain. We now describe below: For each application domain, which design principles were seen as most relevant; and for each of such design principles, what kind of *theoretical/empirical grounding*, *multi-stakeholder involvement*, and *evaluations* have been made to address it.

**Personalised Tutoring/Intervention.** This domain is perhaps the only domain that the ten principles were more evenly addressed. Starting from *accountability*, while originally articulated in the frameworks as encouraging audits and continuous monitoring (Section 3), we found that in practice, this principle was mostly achieved through *multi-stakeholder involvement*, such as conducting expert consultations co-design workshops, and evaluation with experienced teachers [18, 115]. As for *sustainability*, this principle refers to supporting children’s long-term development under child-context. and is predominantly achieved through *theoretical groundings*. Such groundings include educational theories such as Zone of Proximal Development [124], early childhood theories [38, 97, 138], psychological-based theories such as motivational design theory [139], and social support theory [129]. All these theories were consulted so as to ensure the system will have a positive long-term effect on children, instead of purely focusing on short-term learning gain. The principle is also achieved through *evaluations*, to assess children’s self-motivation [73] and whether children’s learning habits were cultivated [73, 124]. As for *ensuring inclusion of and all*, the principle is most supported through *multi-stakeholder’s involvement*, which means that children as well as parents were invited to the design [124] and evaluation process [34, 139]. One paper based its design on the *theoretical grounding* of self-determination theory, to support student-centered learning [129]. Finally, *meet developmental needs* is achieved through both *empirical groundings* and *evaluations*. Children’s developmental needs of different age were consulted during the design stage [113, 117]. Multiple types of assessments were made including evaluating the ease of use of a system for a given age [38, 92], its suitability to children’s developmental needs [113], and the completeness for covering all the developmental areas of the child [113].

**Medical Diagnosis.** Unlike *personalised tutoring/intervention*, in which considerations around design principles were more evenly distributed. The *medical diagnosis* domain is one of those domains that only a small number of design principles were addressed very locally on some specific concerns. In fact, the only two principles that were seen as important for this domain are *accountability* (7 papers) and *safety/do not harm* (42 papers). Starting from *accountability*, the principle is mostly achieved through *multi-stakeholder involvement*, which means that professional therapists [113, 119]



**Figure 3: Types of data processed across application domains of AI for children and our definition of personal data (PI) and special category of data (SC).** Applications shaded in different shades of red were identified to use *special category data*, including demographic data, health data, biometric data, and genetic data; applications shaded in yellow used *behaviour data*; those shaded in lighter blue used *use-case specific data*; and those in dark blue did not use any child-specific data. Both *use-case specific data* and *non child-specific data* belong to category non-personal data.

		APPLICATIONS DOMAINS OF AI FOR CHILDREN								
		Personalised Tutoring/ Intervention	Medical Diagnosis	Harms & Safety	Social Robotics	Personalised Entertainment	Public Services	Speech Recognition	Emotion Recognition	Age Recognition
10 THEMES FROM AI FRAMEWORKS	1.Fairness & Non discrimination	-	-	-	-	-	1	-	3	4
	2.Accountability	8	7	-	-	-	1	-	-	-
	3.Sustainability	15	-	-	5	-	-	-	-	-
	4.Transparency	1	2	-	-	-	-	-	-	-
	5.Privacy	-	-	3	-	2	-	-	-	-
	6.Safety/Do No Harm	-	42	-	-	-	-	-	-	-
	7.AI for safeguarding /Protect from Harm	-	-	39	-	4	-	-	-	-
	8.Exploitation and manipulation	-	-	-	-	-	-	-	-	-
	9.Ensure inclusion of and for all	19	-	-	1	2	-	-	-	1
	10.Meet developmental needs	4	-	-	-	5	-	-	-	-

**Table 2: Crosstabulation between application domains of AI and ten design principles identified from AI & children frameworks.** The number in each cell represents the number of papers from each domain that have addressed each principle. Each cell is not mutually exclusive as a paper can address multiple principles. The most addressed principles from each application domain (with the greatest number of papers) were highlighted in bold, see Table 4 in Appendix for a complete codebook on the means through which each principle was addressed.

and expert medical doctors [19, 58, 95, 143] were invited in the design and evaluation to assess the reliability and quality of the generated results. As for *safety/do not harm*, it is not surprising to see that this principle is considered to be of huge importance for

medical diagnosis systems because any mistakes could potentially lead to tremendous detrimental impact on children. Interestingly, this principle is predominantly achieved through *evaluation*, and

almost all assessments were conducted through pure technical evaluations, measuring the accuracy, precision and recall of the results generated by the systems [43, 71] using open-sourced children's data. Out of these 42 papers, 35 of them were found to have only carried out evaluations on results generated by machine learning classifiers [98, 99], without any focus on how such results were generated and how they may affect the users; while the other 7 papers were grounded upon more principally collected *empirical groundings* [43, 71].

**Harms & Safety.** Similar to *medical diagnosis* systems, this application domain is also one of those that only addressed a small number of design principles, focusing very locally on some specific concerns. The most addressed principle, not surprisingly, is *AI for safeguarding* (39 papers). This principle states that AI systems should be designed and applied to proactively and (semi-automatically) protect users from harms, be they online and offline - which is exactly the design goal of all systems from the domain of *harms & safety*. This principle is achieved mainly from two aspects: first through consulting on *empirical groundings* on the types of online and offline harms that could be there for children - such empirical groundings include categories of online inappropriate content out there for children [76, 137], and offline risks such as previously identified risk factors in classrooms [52]; second, through conducting *evaluations* to assess whether the systems have successfully mitigated such risks and harms [52, 153]. *Privacy* is another principle addressed in this domain, which is achieved mainly through consulting on *empirical groundings*, such as existing findings suggesting children's demand for their privacy, such as online activities and chat records, to be respected by their parents [57, 86].

The design principles were less addressed in the other six remaining application domains. That said, we can still see that some principles were considered very locally in certain application domains. In **Social Robotics**, the most well-addressed design principle is *sustainability* (5 papers). Researchers made *evaluations* on how learning with robots have impact on children [68, 84], and how playing with robots impacts children and changes their perceptions of the robots [33, 34, 132]. In **Personalised Entertainment** systems, the principles were addressed more evenly: *AI for safeguarding* is considered through conducting *evaluations* on how successful a system is in shielding harmful content from children; and *meet developmental needs* is achieved through *evaluations* on the suitability, readability and understandability of generated contents [29, 94, 105]. We did not find many papers addressing design principles from the domain of **Public Services** and **Recognition** systems in general. However, the principle of *fairness & non-discrimination* is considered to be most relevant in the **Emotion Recognition** and **Age Recognition** systems, and is addressed through *evaluations* on bias among different age groups, genders and races [37, 96, 113, 134]. This is not surprising as both domains heavily relied on the use of children's facial expression data (as we identified in Section 4.2.3).

## 5 DISCUSSION

In this section, we draw upon our analysis results to explore the idea of creating an age-appropriate design code for AI, situated between

codes of ethical and trustworthy AI and those of age-appropriate design of digital technologies for children, and informed by our systematic review of existing practical approaches. We ask whether such a framework would be useful, what such a framework might offer, and discuss alternative approaches.

### 5.1 Is It Time for a Code for Age-Appropriate AI Design?

The AADC of the UK ICO requires all online services to be used by children to appropriately safeguard children and support children's rights [4]. This is grounded by UNCRC's recognition that children's rights in all aspects of their life should be guaranteed by appropriate legal protections [7]. Although the AADC codes provide strong guidance for ensuring children's data to be used 'appropriate to their age', our analysis (Section 3) shows that the application of age-appropriateness may require new thinking in the area of AI for children.

There are at least two reasons why we think that an AI-centred design code may be beneficial, especially if built upon the foundations of these frameworks. First, our landscape analysis of the literature showed that while designers and researchers did address some of the common principles in their systems, these considerations were localised to a small subset of principles we identified. Such subsets most often corresponded to areas of greatest concern for the application context; for instance, medical systems focused most often on issues of *safety*, and slightly less often on *fairness/bias*, and much more rarely on any other principles, such as *privacy* - which is particularly concerning as we have previously identified (Figure 3) that as high as 93% of medical diagnosis systems made use of children's personal data. A broad, Age-Appropriate AI design code may thus not only serve as a reminder of the other principles, but to highlight risks and issues that may be no less important than the ones that are most immediately relevant for comprehensively ensuring the best interests of children. The second advantage of establishing a distinct Age Appropriate Design Code for AI is that it may create a space for researchers to assemble expertise on the ways different kinds of AI-related harms affect children differently from adults, and a corresponding body of theory and empirical findings for mitigation. In our landscape survey, we noted that various aspects of the designs were grounded in, or guided by, theoretical and empirical work. However, such expertise was localised to a few domains, such as education and learning, or fairness/non-discrimination. The remaining principles had much less supporting theory, which may be due in part to the lack of availability of relevant theory or empirical evidence.

An alternative argument would be that, instead of a unified framework for Age-Appropriate AI, there should instead be principles, codes, or standards relevant to each application domain—such as intelligent tutoring systems, online safety systems, or biometric recognition systems and so forth—that encapsulate the relevant practices for trustworthy and safe designs, in line with current efforts to define domain-specific AI regulations [5]. In fact, such a decentralised approach is one that seems to be already occurring, given the fact that many of the papers we reviewed already considered the ethical and safety concerns most relevant to their domain. However, a disadvantage to this approach is that it naturally favours

a narrow, instead of broad, consideration of potential AI harms and principles to be addressed. The fact is, however, that AI-related risks and harms can stem from many sources, some of which may be secondary to the system itself, such as arising from contexts of their use [13, 28, 85]. A narrow lens thus risks missing this broader contextualisation. A decentralised approach also makes it more difficult for AI systems in different domains to benefit from evidence and expertise gathered from others. Finally, the rate and scale at which AI systems are being embedded in new kinds of systems makes this approach altogether untenable, not only because new application domains of AI emerge at a tremendous rate [9, 14], but also because AI systems are being so pervasively and invisibly embedded in complex, interconnected systems, such as smartphones, smart toys, and smart TVs [3, 9], that such systems are likely to transcend multiple, if not all, potential application domains.

Finally, we believe that having a unified Age Appropriate AI framework, as a part of existing Age Appropriate Design efforts [4, 140], could help standards and regulatory bodies start to ensure that the complex, multi-dimensional and often difficult-to-anticipate long-term safety needs of children are met, as technology startups race to bring AI technical innovations to market [14]. This is reflected in our findings such that a fair number of papers (64%) in our survey failed to explicitly apply any consideration of any ethical or AI safety risks to children, focusing instead on performance metrics (such as accuracy) instead of potential impact. Appropriately scoped, a regulatory codes and duties of care that are specific for designing AI for children could lower the barrier, and in some cases, incentivise innovators to address a set of core principles, including safety, fairness, inclusion, long-term impact/sustainability, and privacy.

Our review has also highlighted the needs to reconsider existing AI regulation frameworks given the specific needs and vulnerabilities of children. The highly personalised experiences promised by AI technologies also raise a need to consider children's rights and safety in this particular technological context. For example, in their initial years (3-5), children's interactions with AI were more limited to adult-guided activities as well as home IoT systems [87]. During this stage, considerations of risks related to violation of safety and safeguarding would be particularly relevant as systems that closely involve young children need to be thoroughly tested and robust against harms and threats. Failure to adhere to such principle would lead to severe results on young children. Meanwhile, another example would be for children between 12-15, their interaction with AI gradually shifts towards AI-enabled personalised entertainment such as social media platforms and video-on-demand platforms [102]. Children at this stage are undergoing significant neuro-psychological changes, and are often easily influenced by the content they see as well as addictive designs [79, 104]. For children at this stage, more attention should be paid to the risks related to violation of privacy, manipulation and exploitation, and AI developers should be urged to not take advantage of children's physical, social, or psychological weaknesses

## 5.2 Towards a Code for Age-Appropriate AI Design

What might our analysis suggest about assembling a code for Age-Appropriate AI Design? We feel that such a code should be strongly connected to, and contextualised against both principles for safe and ethical AI, and those for child-centred and age-appropriate design. Our thematic analysis described in Section 3, established an alignment among such principles; thus, we feel it is a useful place to start.

The ten common principles were derived straight from our framework analysis, which was meant to provide an objective reflection on the common themes and design considerations in some of the most comprehensive and closest (at the time of this writing) to being enacted AI frameworks. Despite being an objective reflection, we also recognise that there might be redundancy among them, e.g. *Transparency* and *Accountability* had strongly related and somewhat overlapping design considerations. In order to provide future researchers and designers with better implications in developing age-appropriate AI solutions, we condensed these ten principles and derived a smaller and more succinct set of five principles by grouping related considerations together (Table 3). To ensure that different aspects of considerations were not lost during this process and foster ease of interpretation, we described core considerations under each principle as *key elements*. These considerations were based upon both recommendations in the existing frameworks (Section 3) and design considerations of existing AI systems (Section 4.3). Finally, we attempt to highlight essential challenges to achieving the principles below, based on our findings on existing AI systems, and supplement these challenges with those discussed in the greater AI fairness and ethics literature in places where relevant. Our more condensed version of five principles would now provide future AI developers with a more succinct and effective set of rules to follow, as well as challenges they should be aware of.

These five consolidated principles should not be interpreted as a 'complete' or 'sufficient' set of considerations, but instead suggest them be considered as a starting point towards a more comprehensive Code for Age-Appropriate AI.

*Fairness, equality, inclusion and access* is derived as a combination of the *fairness & non-discrimination* principles and that of *universal inclusion*, relating not only to discovering the needs of diverse groups but also ensuring that all children are treated fairly and equally. Participatory methods involving children from a variety of backgrounds and with different abilities have been applied in a variety of contexts (e.g. [72, 112]), and should be an essential strategy in creating human-centred AI for children. Theoretical work in AI and fairness has focused on statistical approaches to ensure 'black-box' AI classifiers do not yield allocative harms that disproportionately impact particular groups [6]. Work on fairness in a child-centred context, however, has thus far been scarce. Unfortunately, discovering and mitigating representative harms may be very difficult in practice due to their being highly contextual [67].

*Transparency* and *accountability* are often brought up together in the literature. *Accountability* requires to identify a chain of responsibility for system (mis)-behaviours, and we believe that this responsibility should include both algorithmic accountability that

PRINCIPLES	Fairness, equality, inclusion, and access	Transparency and accountability	Privacy, manipulation, and exploitation	Safety and safeguarding	Sustainability and age appropriateness
<b>Key Elements</b>	<ul style="list-style-type: none"> <li>• <b>Design inclusion:</b> Involve children, guardians and other stakeholders from diverse groups in system design, implementation, and evaluation to identify needs of children with different abilities, backgrounds, socioeconomic circumstances</li> <li>• <b>Sensitivity to Marginalisation:</b> Identify how system use and deployment might impact children from marginalised groups, particularly identifying "feedback loops" that might exacerbate existing inequalities</li> <li>• <b>System fairness and equality:</b> Establish a methodology for testing to ensure all children are treated fairly and equally by systems through continuous, child-centred evaluations</li> <li>• <b>Universal access and inclusivity:</b> Ensure systems will be available to, and usable by all children equally</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Accountability:</b> Identify a chain of accountability for system (mis)-behaviour, from system designers/manufacturers to parents/guardians</li> <li>• <b>Redress:</b> Have clear mechanisms for redress (by parents and children) for when things go wrong</li> <li>• <b>Transparency:</b> Make systems easy to understand and predict, including mechanisms of identifying what might happen, why it happened, and what to do if something went wrong, in a form suitable for both parents/guardians and children</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Interpersonal privacy:</b> Support and respect children's need for privacy in an age-appropriate manner, from people around them, especially parents</li> <li>• <b>High standards of data privacy:</b> Apply best practices to protect data about children using, e.g., data minimisation, strong encryption, privacy-preserving techniques, &amp; strict non-disclosure to third parties</li> <li>• <b>Right to be left alone:</b> Avoid behavioural manipulation where possible, especially when harmful/detrimental to children.</li> <li>• <b>Forbid all exploitation:</b> Do not take advantage of children's physical, social or psychological weaknesses, including through use of addictive design</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Do no harm:</b> Ensure systems do not directly or indirectly endanger children through intentional or unintentional design or behaviour</li> <li>• <b>Robustness:</b> Ensure safeguarding systems are thoroughly tested, vetted, and robust against known harms and threats (including manipulation by malicious adversaries)</li> <li>• <b>Fail-safety:</b> Ensure systems are designed to reduce children's exposure to harms even in the case of system failure</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Long-term effects and sustainability:</b> Special consideration and care should be applied to identifying and mitigating potential effects on children's long-term well-being and development</li> <li>• <b>Address children's individual, changing developmental needs:</b> Children's needs will evolve at different stages of development, which should be accommodated for where possible. This includes not only application-specific needs but also needs pertaining to safety, safeguarding, and privacy.</li> </ul>
<b>Challenges</b>	<ul style="list-style-type: none"> <li>• It is challenging to directly involve children as participants in the design process, and may be particularly difficult to get a diverse group of children</li> <li>• <i>Existing AI systems</i> showed that it might be particularly hard for some domain-specific applications to consider whether discrimination exists, e.g. personalised entertainment systems</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Existing AI systems</i> showed that it could be laborious and unrealistic to include such accountability systems or mechanisms, thus accountability is mostly achieved through involving third-party professionals</li> <li>• Individual children could have different capabilities on interpreting transparency messages</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Existing AI systems</i> showed that sometimes the use of children's personal information is essential for the functioning of the system</li> <li>• <i>Existing AI systems</i> showed that sometimes exploitation and manipulation is needed, especially in personalised entertainment systems</li> <li>• Hard to determine and judge between 'good' /paternalistic nudging, and 'detrimental' manipulation and exploitation</li> <li>• Have to make compromises due to limited monetisation options</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Existing AI systems</i> showed that this principle is mostly evaluated through pure technical means</li> <li>• What counts as 'harmful' content could be subjective</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Existing AI systems</i> showed that anticipating/designing for developmental needs may be difficult outside learning and education, where there is limited supporting theory and empirical evidence.</li> <li>• <i>Existing AI systems</i> showed that the evaluation criteria is vague in terms of what counts as supporting children's long-term development</li> </ul>

**Table 3: Towards a Code for Age-Appropriate AI Design: Proposed consolidated principles for Age Appropriate AI, synthesised from ethical AI & children's frameworks (Section 3), and landscape analysis (Section 4.3), with each principle represented by a range of *key elements* - core considerations, and exemplified by a range of *challenges*, derived from those identified in our review of literature.**

is derived from designs and social accountability that can be contributed to stakeholders, typically including the professionals or parents/guardians. *Transparency* is of great importance within this chain to make sure everything is easy to understand, and we believe

transparency should not only be about the system itself, but also the accountability procedures, such as what to do if something went wrong. Although these considerations may have been addressed at some level in certain approaches [50, 51], our results showed no



paper considered accountability and transparency from more than the system perspective - which could be partly due to the lack of direct interaction with users (such as facial/age recognition systems) or the complex process involved. In practice, our findings showed a more common approach to addressing accountability through introducing accountable third party professionals (e.g. doctors in medical diagnosis systems [58, 143]) in the design and evaluation process for specific applications domains.

Similarly, *privacy* and *manipulation and exploitation* are also closely related. To protect children's privacy refers to two things - respecting their interpersonal privacy, examples including not showing detailed online activities of children to their parents [60]; and implementing systemic-level privacy, such as applying data minimisation and privacy-preserving techniques to prevent children's data from being collected by third parties [75]. In fact, misuse of data is one of the main mechanisms that manipulation and exploitation are built upon [146], and thus should be prevented appropriately to children's age. That said, our findings also showed that the use of children's personal information is sometimes essential for the functioning of many systems, medical diagnosis systems in particular, and a recent study with developers also suggested that while they want to respect children's privacy, they have to make compromises due to limited monetisation options [48]. Nevertheless, data collection should be strictly minimised for the purpose needed. Our findings also showed that it is often considered hard to determine and judge between 'good' nudging and 'detrimental' manipulation and exploitation [30, 142], and we found although nudging practices can be used positively for children in applications such as engaging and motivating them in learning, transparency/accountability of such an approach or data minimisation principles are not always well-considered along.

The word 'harm' is centred to *safety* and *safeguarding*, that is to ensure systems would not do harm to children, as well as protect children from harm. On the other hand though, that has been a long debate on what indeed counts towards 'harm to children' [63, 106], and that 'harmful content' could be subjective and contextual, and thus individual to identify alone [77]. This is perhaps why we found that existing AI systems mostly evaluated their safety through pure technical evaluations, which is simpler but is only useful in application domains in which there already exists an established list of harms to be considered. This technical focus on assessing harm is also observed in our review of AI systems for children (e.g. the accuracy or precision of the systems for medical diagnosis or recognition). Achieving personalised and contextualised assessment of system effectiveness would yield more informative outcomes, however, this would often require access to vulnerable children or specialised learning/medical environment, which can be a barrier non-trivial to overcome.

Finally, we posit that *sustainability* in a child-specific context should refer to supporting the long-term development of children, and in a way that considers the important aspect of *meeting developmental needs* of children. While such age-appropriateness consideration is vital not only for sustainability, but also across multiple aspects including safety, safeguarding, privacy, transparency; our findings on existing AI systems showed that to anticipate/design for developmental needs may be difficult outside learning and education, where supporting theory and empirical evidence are less

well-identified. We also found that the current evaluation criteria tends to be vague in terms of what counts as supporting children's long-term development. Thus including children's voices is increasingly recognised in both regulatory development [140] and empirical explorations [54].

## 6 LIMITATIONS AND FUTURE WORK

Among limitations, the first pertains to the framework analysis: our analysis consisted only of a sample of emerging policy frameworks, and only considered those specifically about AI. This means that we did not include white papers, independent reports and other documents from researchers [35, 41, 88] and the third sector, such as guidelines and design recommendations for AI. This also omitted policies that relate to AI systems but are not about AI itself, including the GDPR [2] among others. Nevertheless, our selected set of AI frameworks represented not only the broadest and the most comprehensive set of policies proposed for AI, but were also the closest (at the time of this writing) to being enacted and having a real influence on AI design in practice. Secondly, those existing regulations not specifically for AI all tend to be developed for a very focused area or domain, e.g., online data protection (GDPR [2]), automatic vehicles [12].

A second significant limitation is that we based our landscape analysis on a literature review, which means that our sample of AI systems was focused disproportionately on research systems and trials rather than commercial systems. We did this primarily out of practicality; it is often difficult to get access to design documents for commercial systems especially across organisations. We also wish to work with designers of children's technologies across domains to refine and further inform a comprehensive code for age-appropriate AI.

One of the major challenges with designing age-appropriate AI for children is to make the AI policies and design guidelines translational to AI developers. By combining and synthesising key elements and challenges from both AI policies/frameworks and existing AI practices, we proposed five consolidated principles that could act as a starting point towards a more comprehensive Code for Age-Appropriate AI, which we hope could serve as a bridge between AI policy makers and AI developers. Meanwhile, recognising the challenge of translating regulations to practice, our future work would involve actually working with AI developers to get more direct inputs from them, especially regarding the challenges addressed in the code. We hope through actually involving AI developers in the process of developing the more comprehensive version of the code for Age-Appropriate AI, we could gain important insights from developers on their concerns and challenges on how to adhere to the code. We hope this could make this code more translational and better guide AI developers to navigate the space of age-appropriate AI design.

## 7 CONCLUSION

AI-enabled digital technologies are being increasingly integrated into children's everyday lives. Yet, as examined by many emerging forms of legislation developments [8, 13, 85] and child-specific guidelines [4, 7, 140], the introduction of AI systems can be associated with risks which could be particularly detrimental to



children [3]. Through a systematic analysis of existing regulatory framework and literature on AI systems for children, we contributed a critical landscape understanding of the regulatory and research development in this emerging domain. This analysis provided a foundation for us to reflect what an “age-appropriate AI” may entail - proposing a consolidated framework informing “Code for Age-Appropriate AI”. Our understanding regarding what age-appropriate AI means and how to achieve this is still in its infancy. We anticipate this research will provide a timely input in this space and incentivise increased interactions between the AI and child-computer interaction communities for this critical application domain.

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	Personalised Tutoring/ Intervention	Medical Diagnosis	Harms & Safety	Social Robotics	Personalised Entertainment	Public Services	Speech Recognition	Emotion Recognition	Age Recognition
1.Fairness & Non discrimination						[evaluation] bias [63]		[evaluation] bias [34,117,144]	[evaluation] bias [12,49,67,99]
2.Accountability	[involvement] expert teachers consulted [15,56] expert therapists consulted [26,69,73,86,135,136]	[involvement] medicals consulted [48,88,108,111,115,12 6,175]				[involvement] experts consulted [10]			
3.Sustainability	[theoretical grounding] ZPD [8] early childhood theory [64,65,177] motivational theory [18] social support theory [1,23]  [evaluation] self-direction [23] self-confidence [1]			[evaluation] impact on children [17,20,34,103,11 7]					
4.Transparency	[empirical grounding] explainability improves learning [18]	[empirical grounding] explanatory messages [73,125]							
5.Privacy			[empirical grounding] interpersonal privacy [120,167] systematic privacy [161]		[empirical grounding] interpersonal privacy [96] systematic privacy [142]				
6.Safety/Do No Harm		[evaluation] [39,42,48,52,60,62,68,8 2,88,92,102,107,111,11 8,122,123,125,126,129, 130,131,132,133,134,13 7,140,151,153,156,157, 160,163,166,168,172,17 4,175,180,183,186] [empirical grounding] established medical evidence [39,42,62,77,79,82,88]							
7.AI for safeguarding /Protect from Harm			[evaluation] [4,11,14,41,43,44,47,49,5 7,67,72,76,99,105,109,11 9,139,141,147,154,155,1 64,167,169,171,181,182, 188,52,82,102,114,118,1 22,137,151,153,160,168, 186] [empirical grounding] established risk factors [54,105,147]						
8.Exploitation and manipulation									
9.Ensure inclusion of and for all	[involvement] children's involvement [1,8,18,20,23,26,33,35,36,46,56, 58,64,97,98,103,128] parents' involvement [53,73]  [theoretical grounding] self-determination theory [23]			[involvement] children's involvement [45]	[involvement] children's involvement [96,142] parents' involvement [142]				[involvement] children's involvement [12]
10.Meet developmental needs	[evaluation] ease of use [64,86] coherence [69] completeness [69]  [theoretical grounding] child developmental theory [69,149]				[evaluation] readability [6,24,25,30,84]				

**Table 4: Complete codebook for the means through applications of AI addressed the ten themes identified in Section 3: *theoretical groundings, empirical groundings, evaluation and multi-stakeholder's involvement.***

AGE	Nr.	References
<b>0-5 (Preschoolers)</b>	<b>22</b>	[11,13,15,17,22,31,42,61,69,73,80,87,119,126,129,130,138,147,163,170,172,185]
<b>6-12 (Young children)</b>	<b>19</b>	[1,4,6,8,9,14,16,19,20,23,24,35,36,46,73,116,126,138,163]
<b>13-18 (Teens)</b>	<b>6</b>	[21,33,66,127,179,187]
<b>Unspecified</b>	<b>144</b>	[all remaining papers]

Special Needs	Nr.	References
<b>physical special needs</b>	<b>23</b>	[5,42,65,68,74,79,83,86,89,90,102,107,115,122,126,128,130,135,136,144,146,160,168]
<b>developmental special needs</b>	<b>40</b>	[26,27,48,52,56,60,62,68,71,73,78,80,82,86,88,92,94,101,108,114,116,118,125,131,132,137,140,149,150,151,160,163,166,168,174,175,178,180,183,186]
<b>socially disadvantaged</b>	<b>6</b>	[3,7,50,58,66,187]
<b>Unspecified</b>	<b>119</b>	[all remaining papers]

**Table 5: Detailed summary of target user groups in reviewed papers with paper references. Each cell is not mutually exclusive as a paper can target multiple user groups.**