

# Submission to the consultation on safe and responsible AI in Australia

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## Executive Summary

Guided by the United Nations Convention on the Rights of the Child (CRC) and informed by our work leveraging artificial intelligence (AI) to improve the lives of children around the world, UNICEF Australia welcomes the opportunity to provide a submission to the consultation on safe and responsible AI in Australia.

Today's children are the first generation that will never know a world without smartphones.<sup>i</sup> Their lives will be enmeshed with digital technologies in a way that no other generation before them has experienced, and AI will permeate through this increasingly digital world as it already does in so many ways.

For children and for society more broadly, the opportunities presented by AI are exciting and almost unlimited, from improving children's access to life saving healthcare, to the vast economic boon it may offer – estimates place the potential additional economic output that AI systems will deliver at roughly US\$13 trillion by 2030.<sup>ii</sup>

UNICEF recognises this potential, particularly for the role it can play in supporting children's development, which is why we already leverage AI systems to predict the spread of diseases, map digital connectivity in schools, and produce better poverty estimation, thus improving our programming.<sup>iii</sup> AI is undoubtedly a force for innovation which can likely help us achieve the Sustainable Development Goals, but it also poses risks to children's safety, privacy, and security.<sup>iv</sup> This could present as discrimination and bias in systems trained on children's data that work unnoticed at great scale,<sup>v</sup> or AI-assisted cyber security breaches that place children at risk of extortion. As with most things, children face increased vulnerability compared with adults, particularly as the negative impacts they potentially face compound over their comparatively longer-lives lived in both online and offline worlds.

Thankfully, as the discussion paper for this consultation identifies, there is a real opportunity for Australia to be a leader in responsible AI, due to our cutting-edge research capabilities, world-leading eSafety Commission, and early adoption of AI ethics principles frameworks.<sup>vi</sup> We have an opportunity now to guide the development and deployment of AI systems which work in the best interests of every Australian, and especially for some of our most vulnerable in children.

UNICEF's global research is particularly useful in this regard and our [policy guidance](#) on AI for children articulates a series of foundations and requirements for child-centred AI. This guidance can help ensure that AI systems are developed, deployed and governed in a way which ensures children's protection, equitable provision for all their rights, and empowers them to participate in an increasingly AI-dependent world. Government and industry alike have a role to play in guiding AI systems in this way, and in doing so can help realise the enormous opportunities that AI offers for every child, everywhere.

## Summary of Recommendations

### 1. Child-centred artificial intelligence

- *Develop, deploy and govern artificial intelligence (AI) systems in line with UNICEF's guidance for child-centred AI, ensuring they protect children, provide equitably for their rights, and empower them to participate in an AI world.*
- *Apply the requirements for child-centred artificial intelligence (AI) whenever AI systems interact with or impact children, regardless of whether they are designed for children or not.*
- *Develop and deploy artificial intelligence systems that simultaneously uphold children's rights to protection, provision and participation.*
- *Foster multi-stakeholder approaches to the development and deployment of artificial intelligence systems, cutting across boundaries between and within government and business.*

## Detailed Recommendations

### 1. Child-centred artificial intelligence

Children born today will never remember a time before smartphones.<sup>vii</sup> They will be the first to regularly ride in self-driving cars, and the essential services they need to survive and thrive like health care and education, will be regularly mediated by AI-powered applications and devices.<sup>viii</sup> This generation will see AI-related opportunities as well as risks for longer than any before it, and of these there are many.

AI systems are fundamentally changing the world, affecting present and future generations of children in many different ways, be it through virtual assistants and video games, to chatbots and adaptive learning software.<sup>ix</sup> Algorithms enhanced with AI provide recommendations to children on what videos to watch, what news to read, and who to be friends with.<sup>x</sup> Additionally, children's lives are also indirectly impacted by AI-powered automated decision-making systems deployed in a variety of areas including healthcare and education access, welfare support, and their parent's housing applications, all of which have consequences for all children.<sup>xi</sup>

Opportunities abound for children in this AI-driven world. In education, AI systems show promise for improving educational outcomes, from AI-enabled learning tools which help children develop critical thinking skills, to adaptive learning programs which provide experiences tailored to the needs of a specific student, to AI-generated curricula which save educators time and allow them to focus on other supports for students.<sup>xii</sup>

AI is undoubtedly an exciting innovation tool but it also poses risks for children to their privacy, safety and security.<sup>xiii</sup> Since AI-powered systems can work unnoticed and at great scale, the risk of widespread exclusion and discrimination is real.<sup>xiv</sup> If AI systems are trained on data which does not reflect children's varied characteristics, then the results may be biased against them.<sup>xv</sup> This exclusion can have effects that last for children, impacting the key decisions that are made throughout their lifetimes.<sup>xvi</sup> Privacy in particular can be a difficult concept for young children to grasp.<sup>xvii</sup> They may divulge too much information to AI systems they interact with, placing them at risk when those systems are breached at the hands of malicious hackers.<sup>xviii</sup>

For these reasons, we are increasingly seeing governments and organizations set guidelines for AI's development and implementation.<sup>xix</sup> Around the world, over 160 sets of AI principles have been developed by governments, companies and advocacy groups.<sup>xx</sup> However, even though there is awareness that the rights of children need urgent attention in the digital age,<sup>xxi</sup> this is not being reflected in the global efforts to make AI systems better serve society.<sup>xxii</sup> Children are interacting with AI systems that are not designed for them and current policy frameworks do not address this.<sup>xxiii</sup> To further complicate matters, we are also at the very beginning of understanding how children interact with and are impacted by AI.<sup>xxiv</sup> The effects of AI will transform children's lives in ways we are yet to understand, for better and for worse.<sup>xxv</sup>

In the face of this AI-driven transformation, UNICEF has developed [policy guidance](#) to complement efforts to promote human-centric AI, introducing a child-specific lens.<sup>xxvi</sup> Drawing on the CRC, the guidance presents the foundations for child-centred AI, suggesting that AI policies and systems should:

- **aim to PROTECT children** – this means protecting children from any harmful and discriminatory impacts of AI systems, but also leveraging AI systems to actively protect children from harm;
- **PROVIDE equitably for their needs and rights** – this means bringing the opportunities of AI systems to children of all ages and backgrounds, fully leveraging them when it is appropriate to do so; and
- **empower children to PARTICIPATE in an AI world** – meaning that children are given opportunities to shape AI systems, and to be able to make educated and informed decisions about their use of AI and the impact it can have on their lives.<sup>xxvii</sup>

Building on this foundation, nine requirements for child-centred AI have been established, complementing key work already underway, but with a focus on children:<sup>xxviii</sup>

## **Foundation = { uphold children's rights }**

*Through the lenses of protection, provision and participation*

- 1 Support children's development and well-being**  
*Let AI help me develop to my full potential.*
- 2 Ensure inclusion of and for children**  
*Include me and those around me.*
- 3 Prioritize fairness and non-discrimination for children**  
*AI must be for all children.*
- 4 Protect children's data and privacy**  
*Ensure my privacy in an AI world.*
- 5 Ensure safety for children**  
*I need to be safe in the AI world.*
- 6 Provide transparency, explainability, and accountability for children**  
*I need to know how AI impacts me. You need to be accountable for that.*
- 7 Empower governments and businesses with knowledge of AI and children's rights**  
*You must know what my rights are and uphold them.*
- 8 Prepare children for present and future developments in AI**  
*If I am well prepared now, I can contribute to responsible AI for the future.*
- 9 Create an enabling environment**  
*Make it possible for all to contribute to child-centred AI.*

*Source: UNICEF Policy guidance on AI for children*

UNICEF Australia's vision is that governments and industry alike will use this guidance in their work to openly and collaboratively share their experiences.<sup>xxxix</sup> The guidance does not claim to have all the answers and the challenge of equally balancing child rights in the digital environment is a difficult one,<sup>xxx</sup> however, we believe it is not only possible but necessary to ensure the protection and wellbeing of children in an AI world.<sup>xxxi</sup>

### **Recommendation**

*Develop, deploy and govern artificial intelligence (AI) systems in line with UNICEF's guidance for child-centred AI, ensuring they protect children, provide equitably for their rights, and empower them to participate in an AI world.*

It is important to understand that AI systems are not magic.<sup>xxxii</sup> They are designed, guided, deployed and governed by people, from programmers who build code, to researchers who feed them data, decision makers who set policy, and users who interact with them.<sup>xxxiii</sup> Everyone in that ecosystem needs to understand the role they have in contributing to responsible and child-centred AI.<sup>xxxiv</sup> To aid with this, UNICEF has developed practical tools, including a [development canvas](#) for AI creators, a [roadmap tool](#) for policymakers, as well as guides for [parents](#) and for [children](#).<sup>xxxv</sup>

These tools can aid with ensuring that AI systems meet the nine requirements for child-centred AI. Within each requirement is a series of recommendations which range from leveraging AI systems to promote children's safety by using them to detect known child sexual abuse material, to ensuring children's data agency by supporting them to access, securely share, and understand how their data can be used or deleted, according to their age and evolving capacities.<sup>xxxvi</sup>

While the full suite of recommendations for the nine requirements can be found in our [policy guidance](#), three cross-cutting recommendations are worth highlighting:

1. **Apply requirements whenever AI systems interact with or impact children** – including applying the requirements regardless of whether or not a system is designed for or targeted at children. This requires developers to acknowledge that children are likely to use systems not targeted at them and design accordingly, and for policymakers to ensure that AI policies cater for children as the default users of AI systems;
2. **Develop and deploy AI systems that simultaneously uphold children’s collective rights to protection, provision and participation** – there are tensions that exist when providing for these rights, and a delicate balance may be required to equally and simultaneously uphold children’s rights, for example, when wanting to protect a child’s privacy and agency at the same time as collecting sufficient data for them to access an AI-based health intervention; and
3. **Foster a multi-stakeholder approach both in government and in business** – AI systems are affecting so many aspects of society that they will inevitably cross organisational, departmental and jurisdictional boundaries, so collaborative multi-stakeholder approaches are needed. Children themselves are a relevant stakeholder here and their involvement can both help build trust in government and business, and help ensure AI guidelines, regulations and systems are realistic and tailored to need.<sup>xxxvii</sup>

#### **Recommendation**

*Apply the requirements for child-centred artificial intelligence (AI) whenever AI systems interact with or impact children, regardless of whether they are designed for children or not.*

#### **Recommendation**

*Develop and deploy artificial intelligence systems that simultaneously uphold children’s rights to protection, provision and participation.*

#### **Recommendation**

*Foster multi-stakeholder approaches to the development and deployment of artificial intelligence systems, cutting across boundaries between and within government and business.*

#### **About UNICEF Australia**

UNICEF believes in a fair chance for every child and we are the world’s leading organisation working to protect and improve the lives of children in over 190 countries. At UNICEF Australia we work to protect and promote children’s rights by advocating for the rights of children in Australia and overseas.

UNICEF Australia would welcome the opportunity to expand further on the measures we have outlined in this submission.

