

Legal Design RoundTable

April 29, 2022

“ amurabi

legal innovation by design

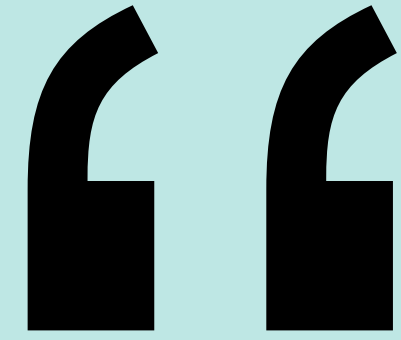


EMPOWERING YOUNG INTERNET USERS WITH THE FRENCH DATA PROTECTION AUTHORITY

How might we create
empowering and **protecting**
tools for
underage users?

“amurabi
legal innovation by design X

CNIL.
COMMISSION NATIONALE
INFORMATIQUE & LIBERTÉS



It is unreasonable to design digital services to be addictive and then reprimand children for being interested only in their screens.

Prof. Eva Lievens and Ingrida Milkaite
Ghent University



« We cannot expect a young person to be able to understand terms and conditions that even an experienced adult struggles with; we cannot serve teenagers personalized ads that they cannot critically process. And it's the responsibility of governments and online platforms to respect every user and build their services and products around the people and not the opposite. »

Charampoulos, BIK Youth
Ambassador from Greece, February 2020,
Safer Internet Day, European Commission

A close-up photograph of a child's hand holding a yellow and black toy telescope. The child's face is partially visible on the left side of the frame, looking through the telescope. The background is blurred, showing a light-colored wall and a green object.

Increased transparency & accessibility

Children merit **specific protection** with regard to their personal data as they may be **less aware of the risks, consequences and safeguards** concerned and their rights in relation to the processing of personal data.

Information (to collect consent) must be provided in a **concise, transparent, comprehensible and accessible way**, in **plain and simple terms**, in particular when the information is meant for **children**

GDPR, Recital 38, Art. 8 and Art. 12

Our approach:
Co-creating with children and teenagers

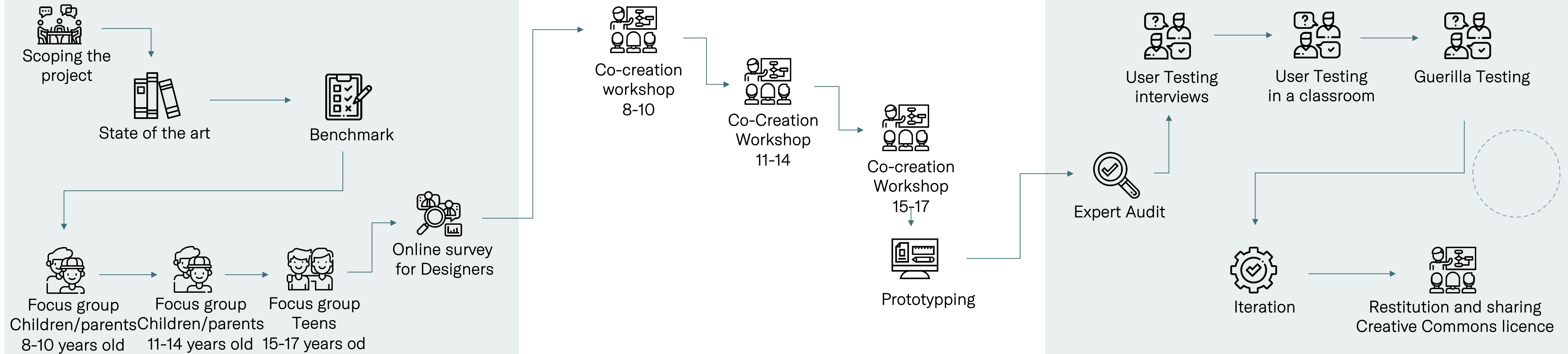
Project Map

1. Immersion and Analysis

2. Co-conception

3. Evaluation and iteration

ACTIVITIES



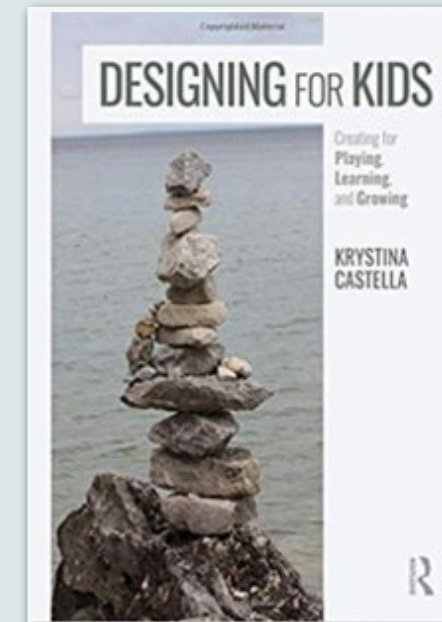
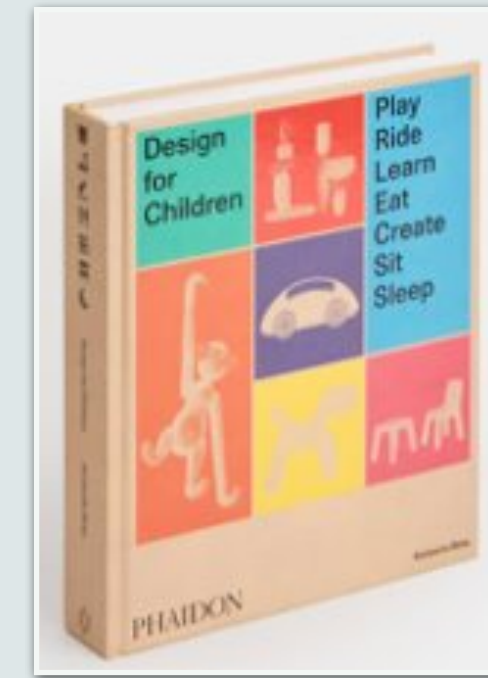
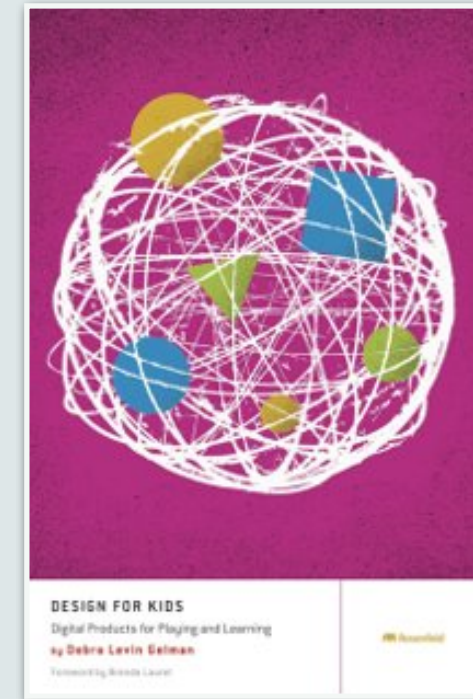
DELIVERABLES

- Vulgarisation article of the user research
- User Research Methodology Toolkit for designers (based on focus groups)

- « Participatory Design » Methodology Toolkit, focusing on how to co-create with minors
- Model Interface and case study on social networks
- Model Interface and case study on instant messaging
- Model Interface and case study on online gaming

- Key concepts of privacy by design for minors
- User testing Methodology Kit focusing on minors
- *Option : Video Tutorials*

BENCHMARK AND STATE OF THE ART



BENCHMARK

Exemple de sources :
Inspirations Guides et outils :

BENCHMARK

Exemple de sources :
Inspirations Guides et outils :

Our Methodology

Focus groups and participatory design, adapted to participants' age

Recrutement of minors through a panelist, based on criteria ensuring representativity in terms of socio-economic background, gender and localisation

Each workshop lasted 3h, with 3 core activities:

Narrative activities

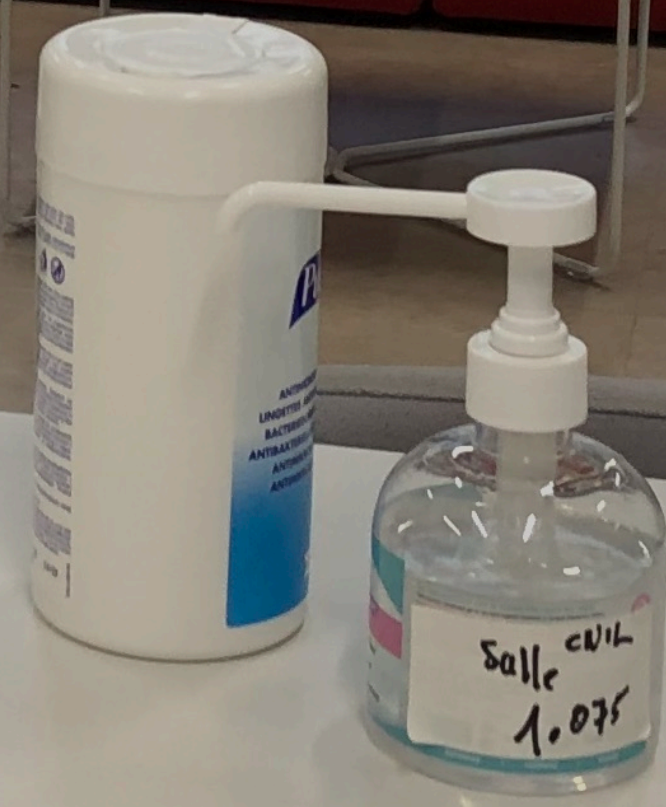
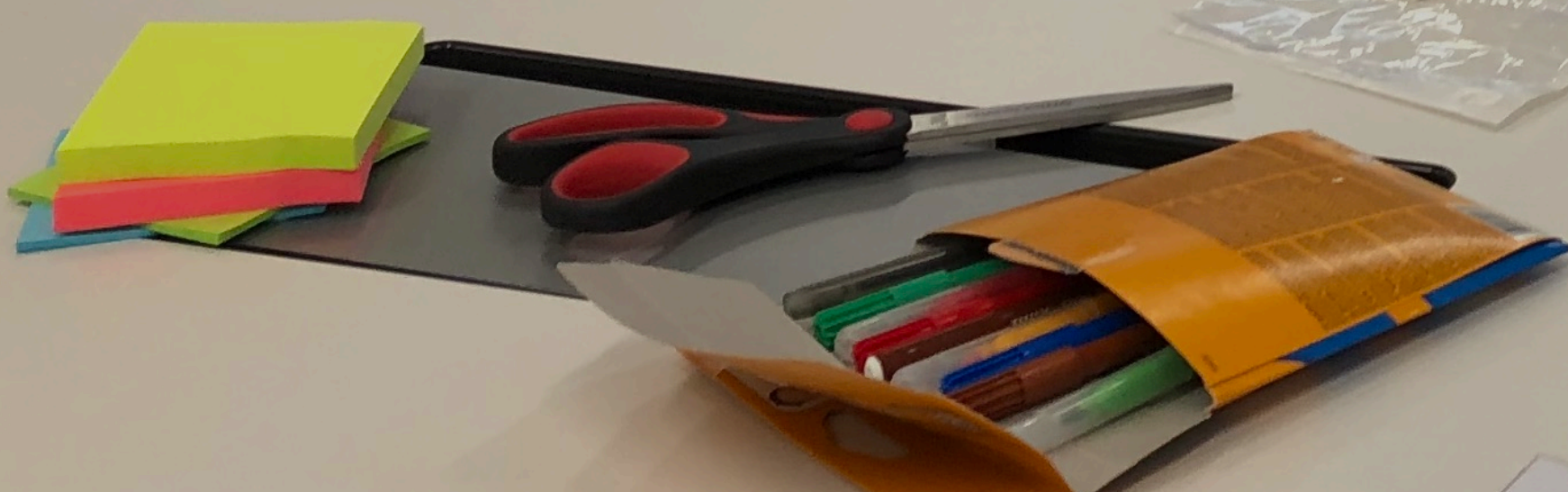
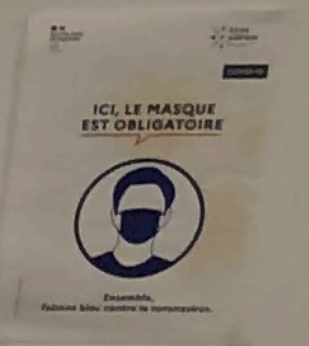
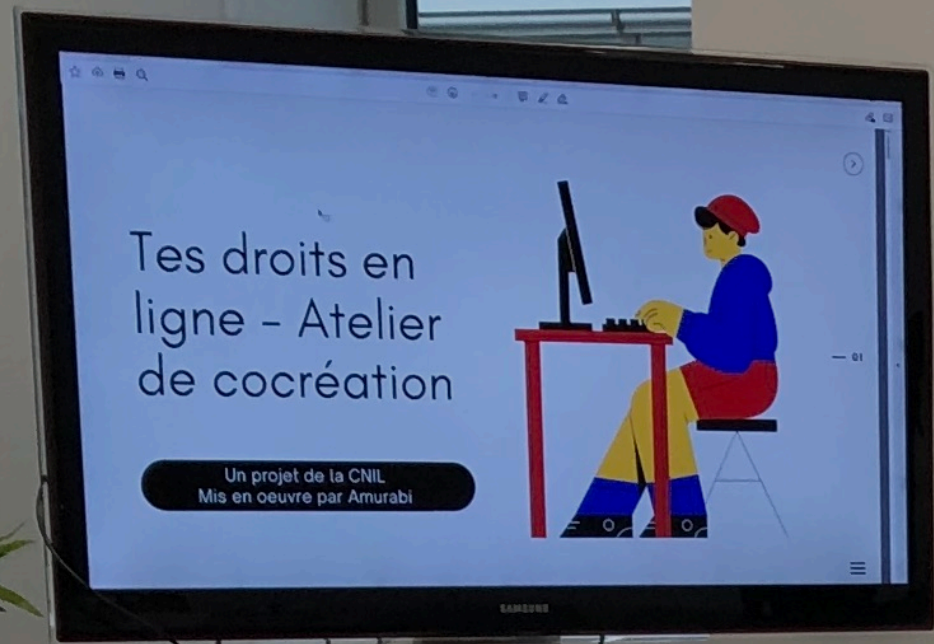
Contextualization and sharing the degree of awareness & knowledge on the topic

Diverging activities

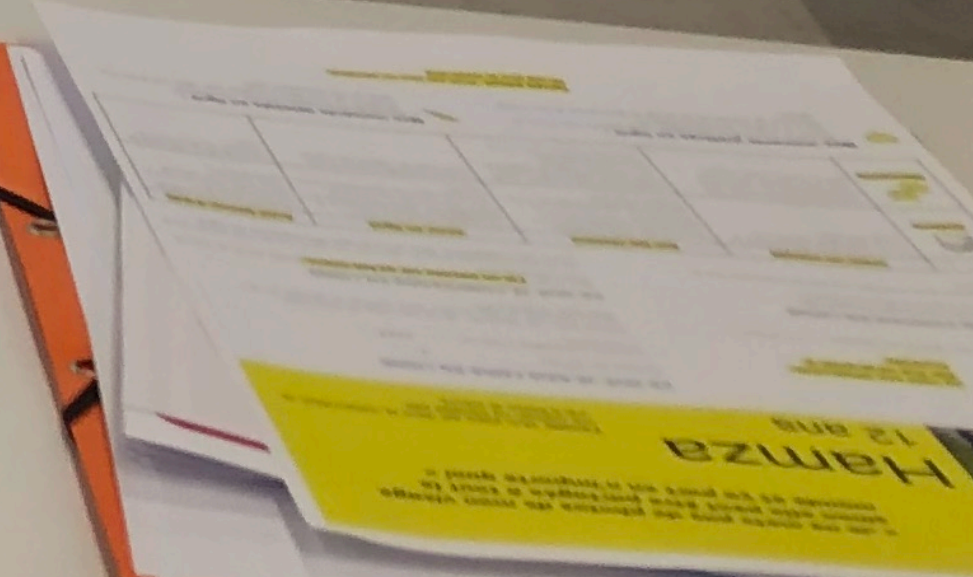
In sub-groups, to have ideas emerge to solve problems identified during phase 1

Converging Activities

Putting in common, debating and defining one or several solutions to be tested



© " amurabi



Co-creation workshops

3 workshops of 3 hrs

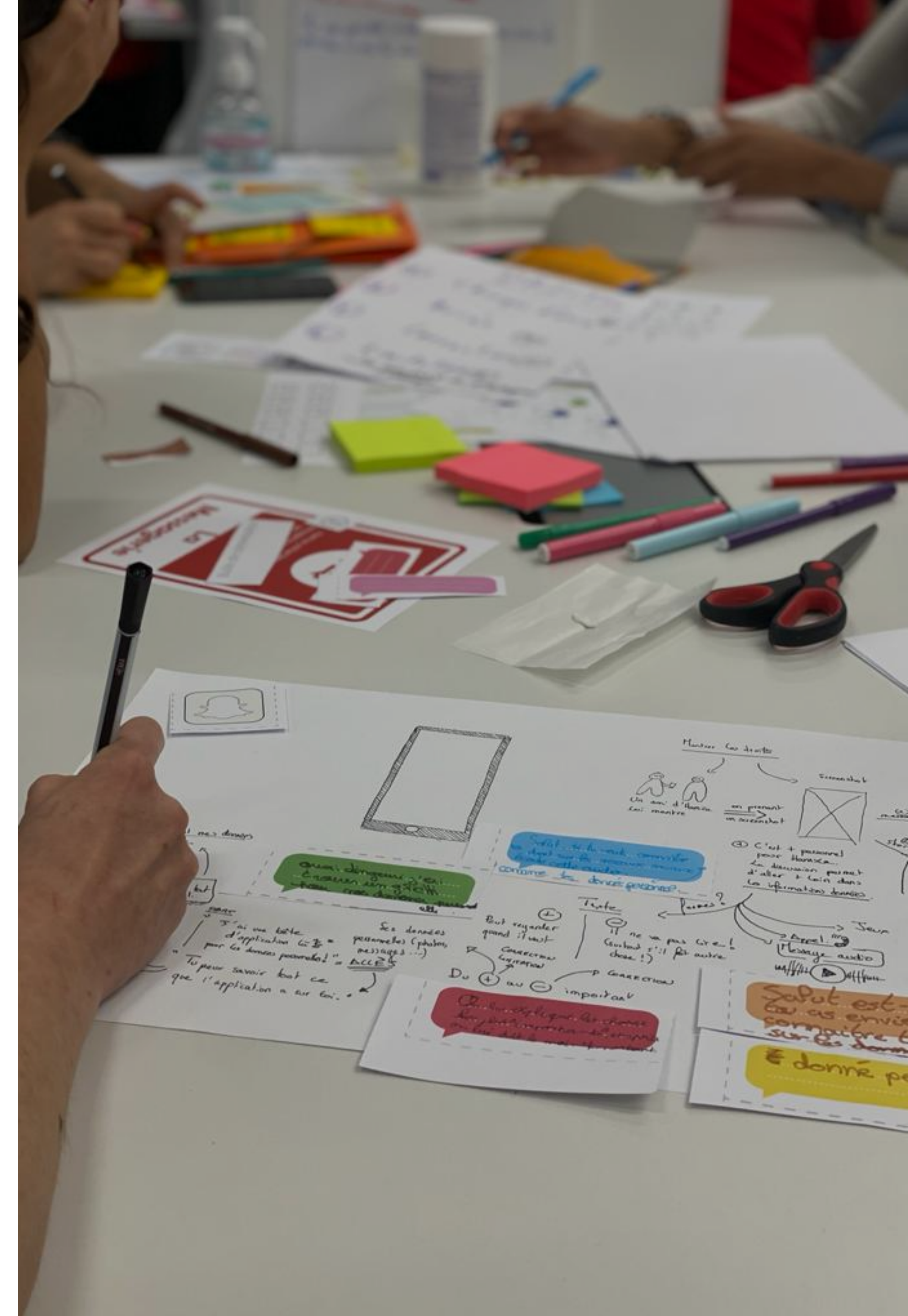
24 minors

3 age group :
8-10, 11-14
and 15-17 years old

16 parents

3 sub-groups in each workshop

- 2 groups with 4 children, 1 parent et 2 facilitators
- 1 group of 6 parents and 1 facilitator (except for the 15-17 years old)



Our key learnings

1. **Minors' attention span is even more limited than what the state of the art suggested**
2. **Minors do not look for information but they want information to be pushed to them as they navigate**
3. **They understand the concept of privacy, and it matters to them. However, they don't see the connection with their digital activities**

LA VIE PRIVÉE

8-10

MES COPINES

Ma famille
Mes photos

les choses à moi

mes affaires
mes données personnelles

Elisabeth
Alexis

Pour moi, la vie privée

9-10

C'est... ont m'a pas le faire tous que
vaut dans la vie.

Être toute seule.

Lire:

Notre
intimité

SACRÉ



C'est qu'elle que
chose pour moi.

Pour moi, ma vie privée,

Marie - Estelle

11-12

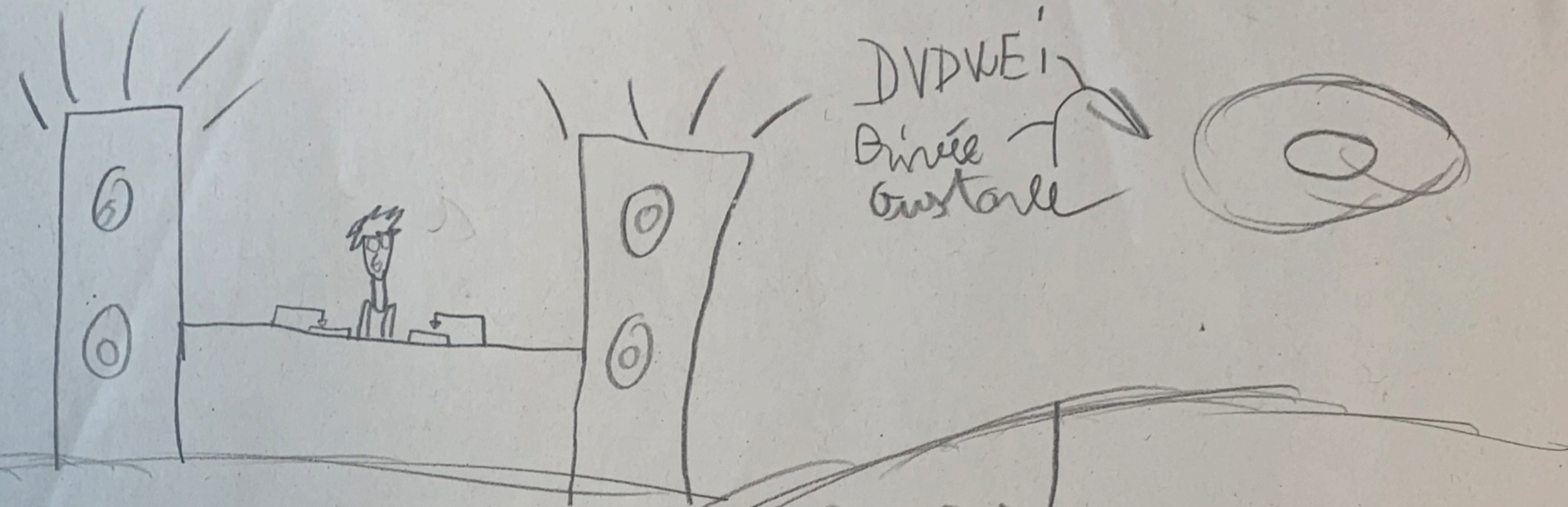
C'est...

Ma vie privée c'est ma famille, mes
amis.

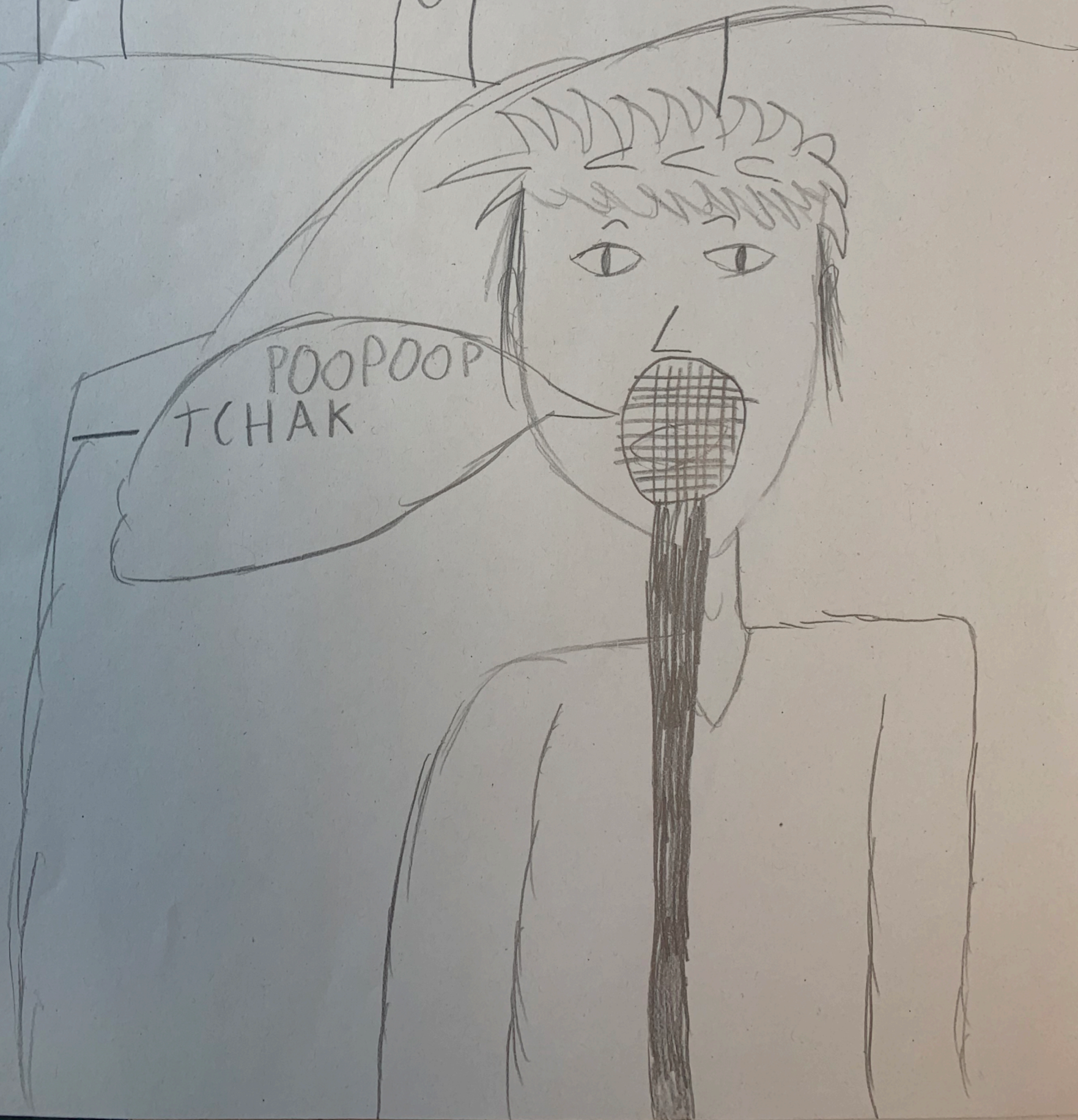
Ma vie privée c'est à moi
Ma vie privée c'est mes photos.

Ma vie privée c'est on ne peut pas me la
prendre ni me la vendre

Pour moi ma vie privée c'est ?
J'aimerais être dj et beatboxeur professionnel.



POOPOOP
TCHAK

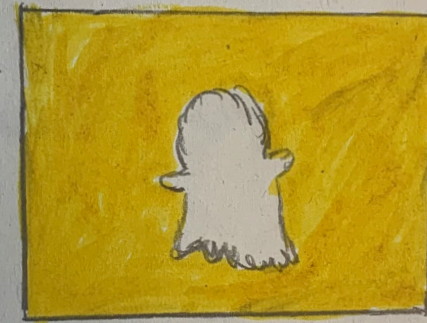


Clemence.C
CM1

Pour moi ma vie privée c'est ?

Mes données personnelles, tout ce qui est sur moi,
ce que je regarde sur les écrans.

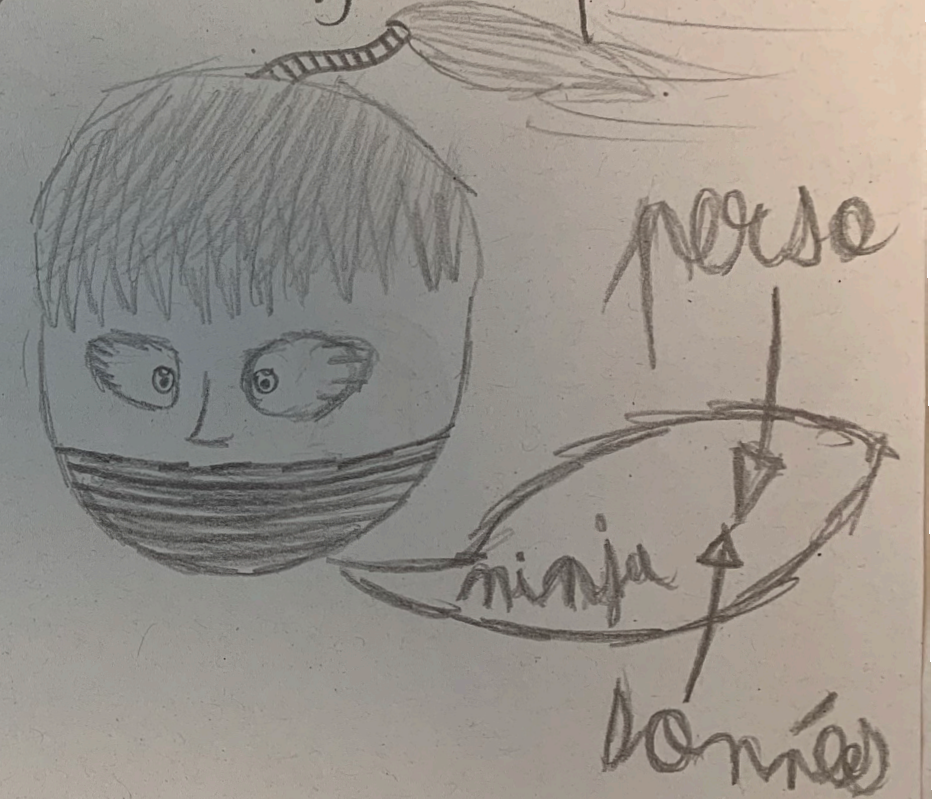
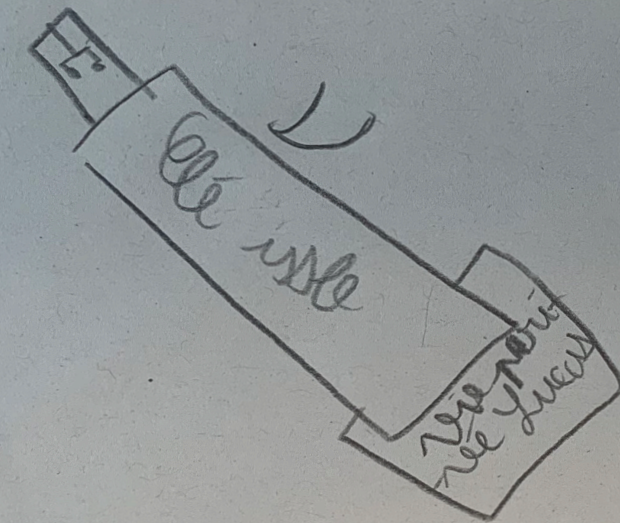
une de mes
applications
préférée:



Snapchat

ce que je regarde

Pour moi ma vie privée c'est ? : Les jeux vidéos,
mon frère, mes pots, l'école, et que



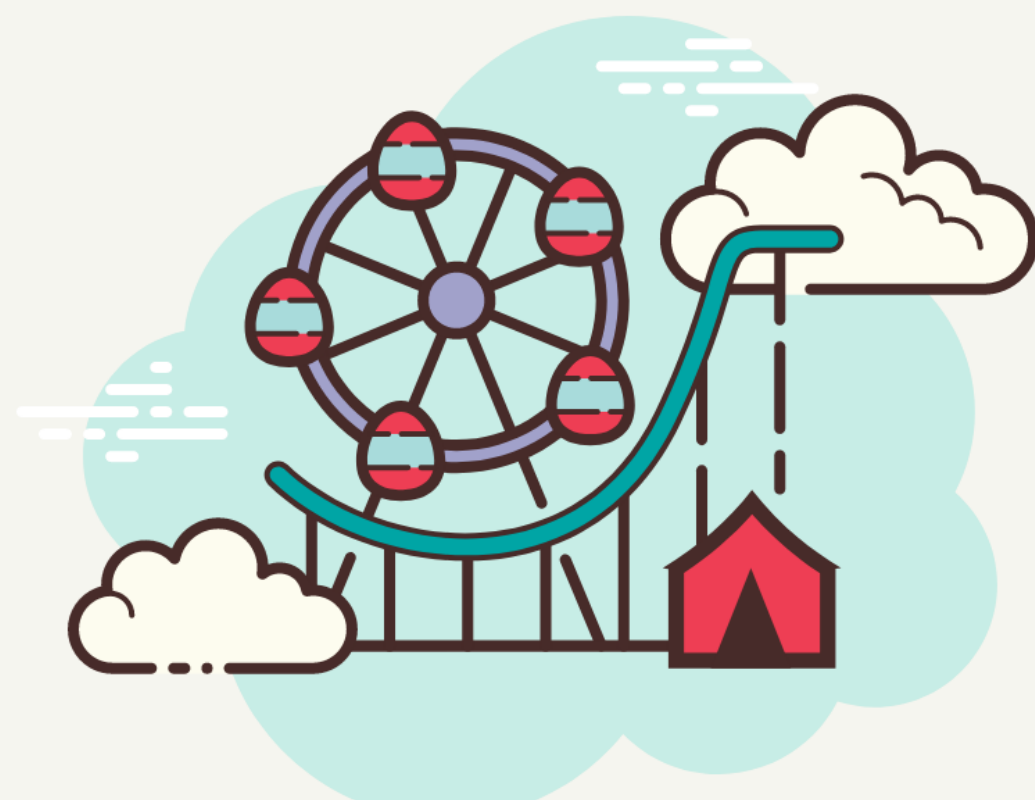
What surprised us

1. When equipped with the right tools, minors do care about privacy and get interested in the topic, and take action
2. Adults are not considered as a resource for help, even among younger children - children believe they know more than their parents!
3. The doses of text which minors can « absorb » is extremely limited
4. We haven't witnessed teenagers' « high likelihood » to take more risks, described in the state of the art

How to co-create with minors?

Example of the amusement park

TA PRÉPARATION
LE PARC D'ATTRACTION

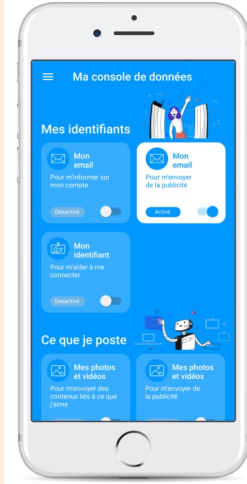


Scenario adapted to each age group
Leveraging a world that is familiar to them
In which they can easily project themselves

Goal:

- Have minors discovering by themselves the stakes behind some data processing and cookies
- Make them more aware of the diversity of information ad content they need to grow and learn.

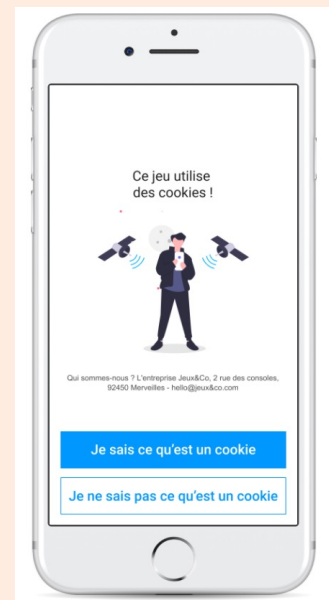
13 Prototypes Co-created!



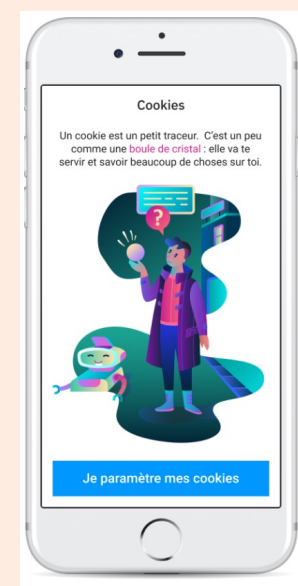
All age groups

8 - 10 ans

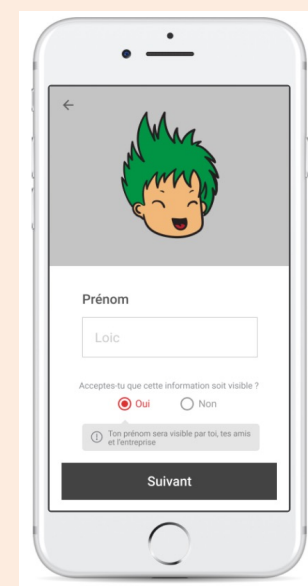
Cookies Set Up 1



Cookies Set Up 2

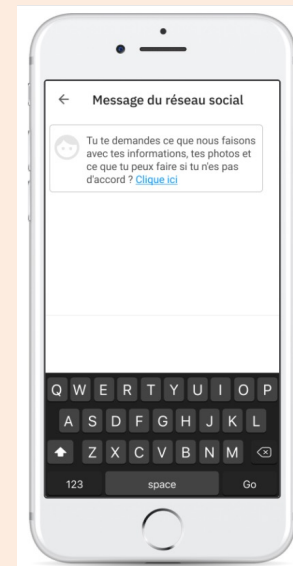


Account Creation

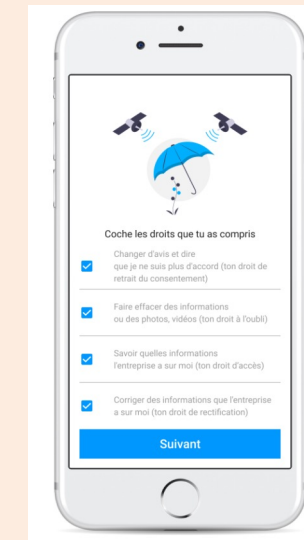


11 - 14 ans

Understanding of rights 1 (video)

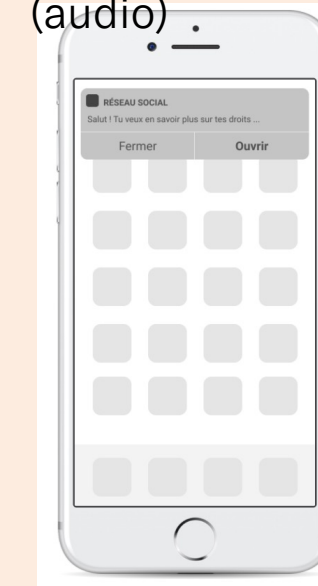


Understanding of rights 2

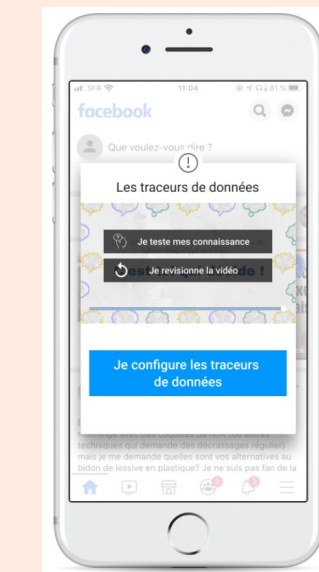


15-17 ans

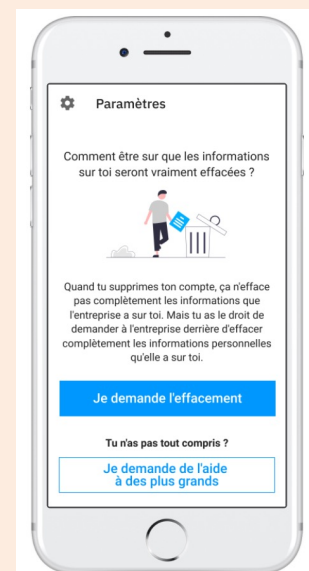
Understanding of rights (audio)



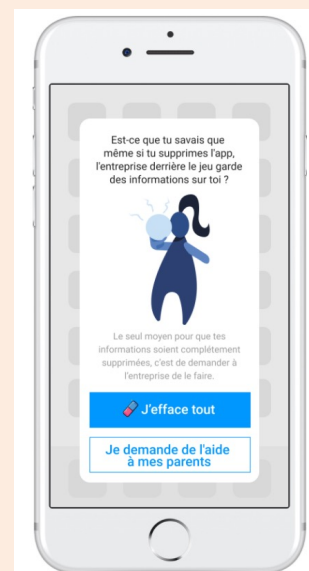
Cookie set-up (vidéo)



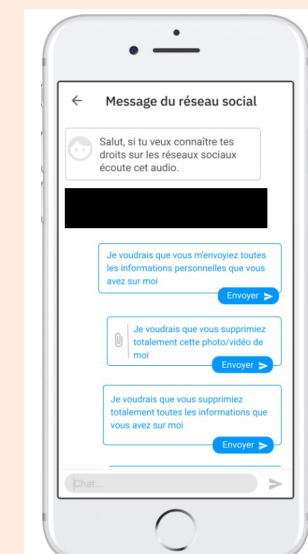
Data Erasure 1



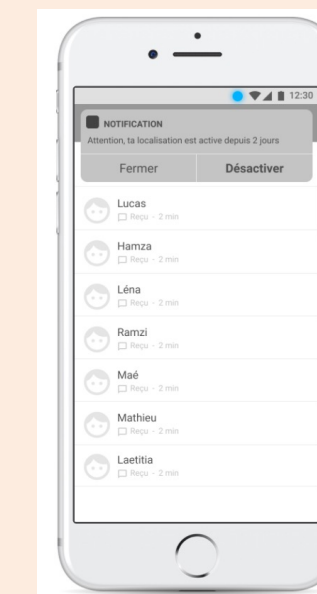
Data Erasure 2



Data Erasure (audio)



Geolocation Set up 1



Geolocation Set up 2



User Testing

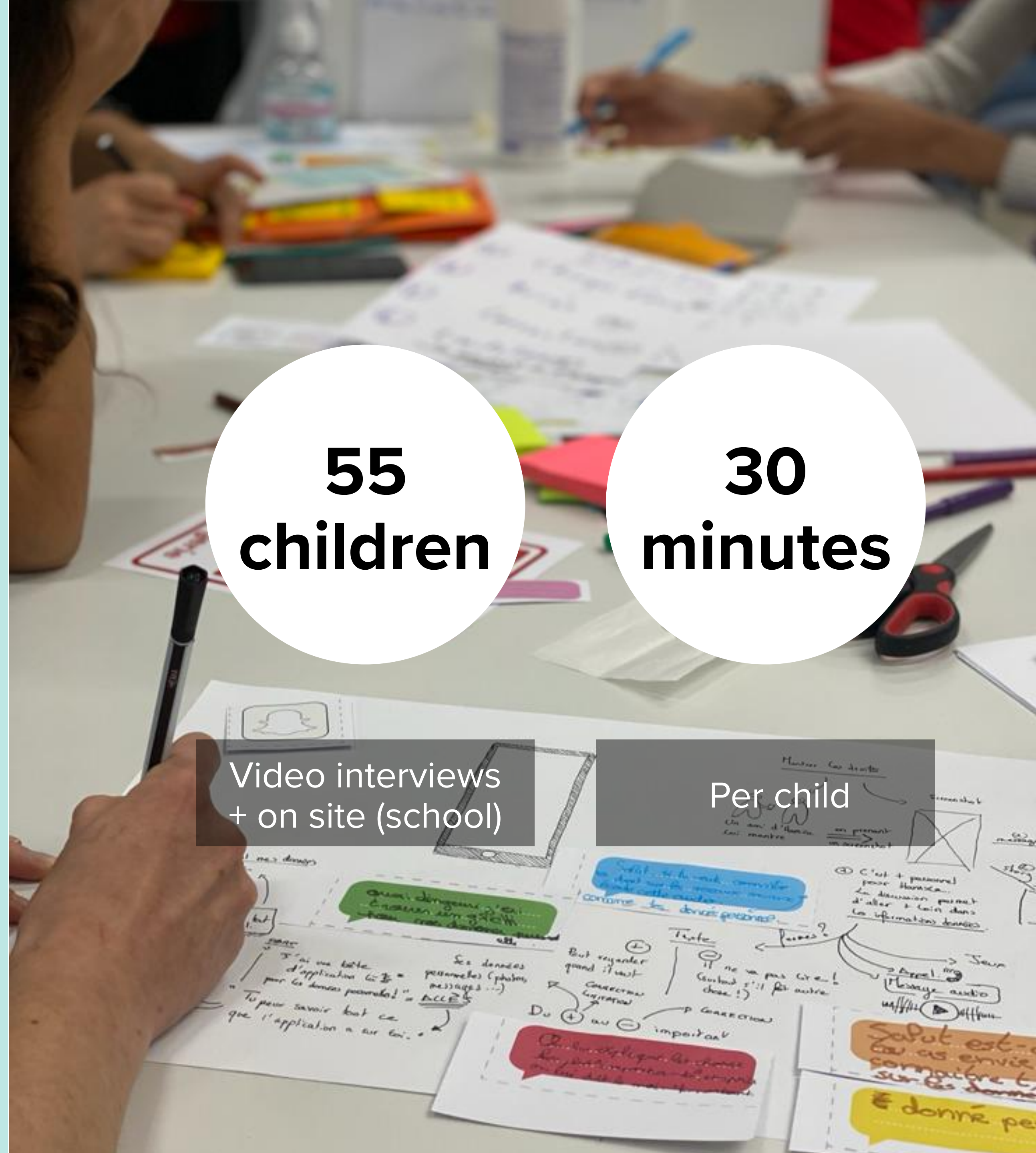
Measure of the perceived usefulness, efficiency and satisfaction

55 children

30 minutes

Video interviews + on site (school)

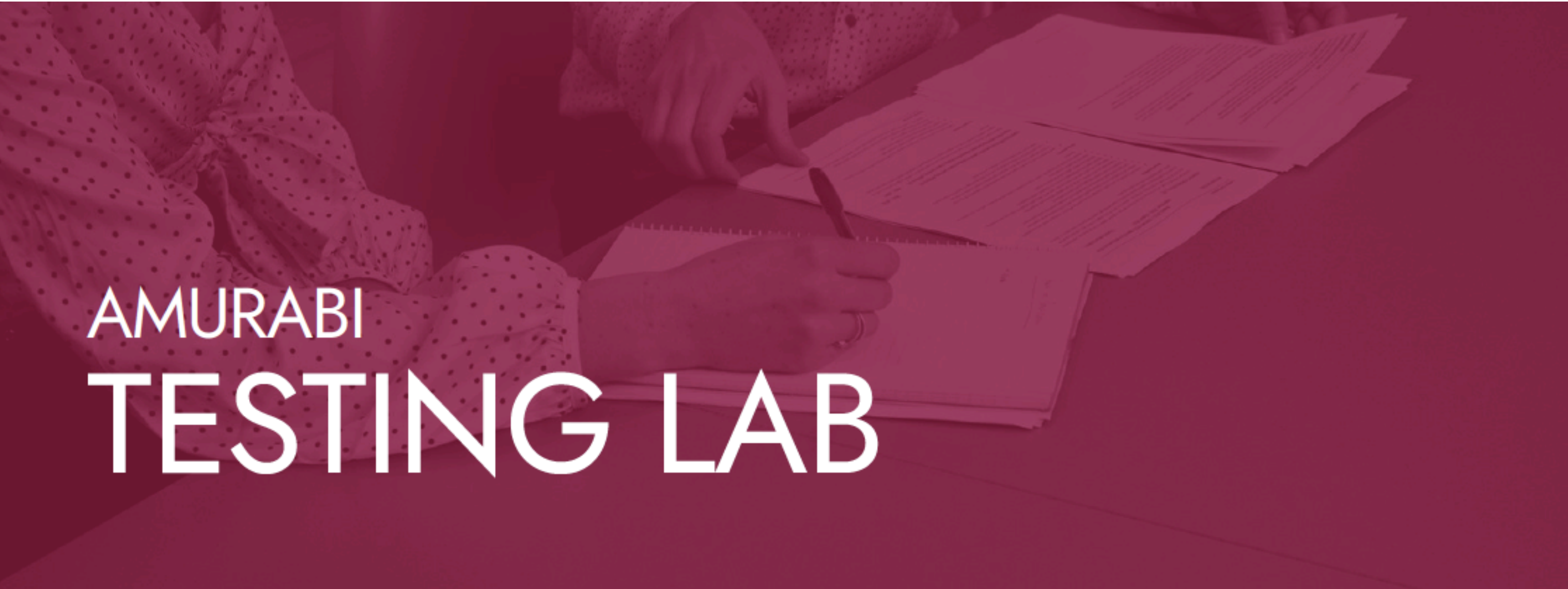
Per child



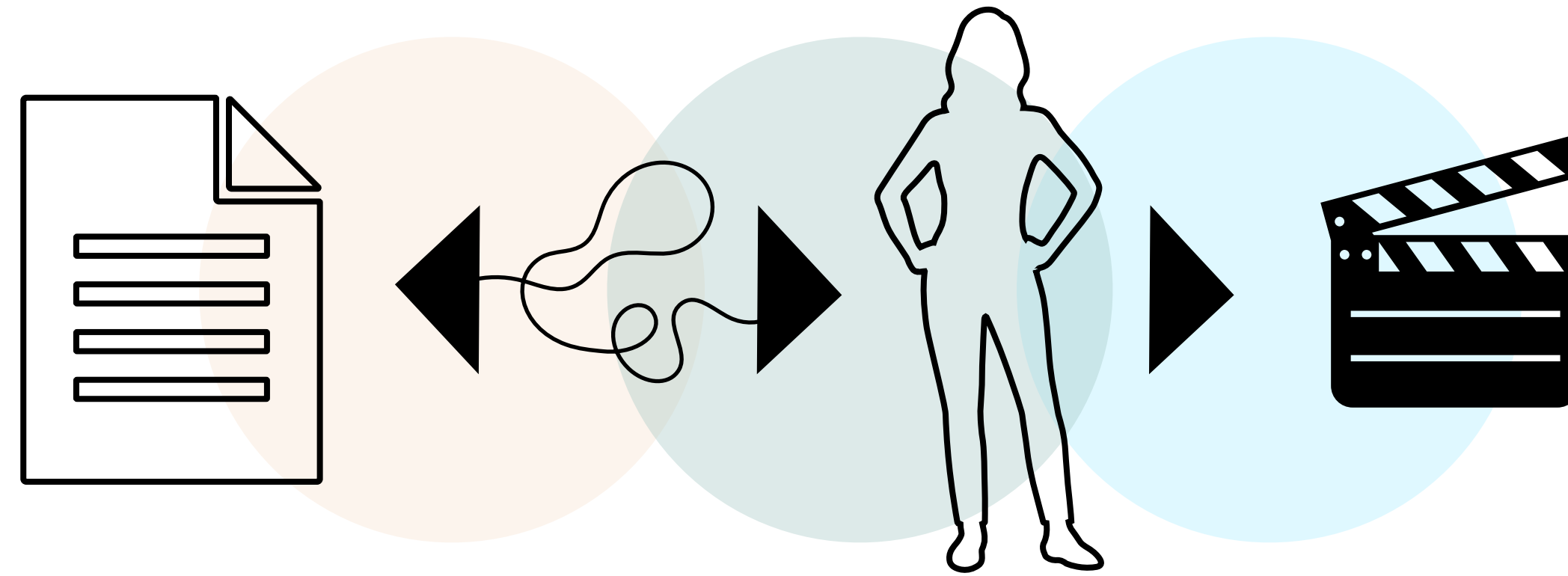
Our integrated User Testing Lab

in partnership with **Mathilde Da Rocha**

PhD in Cognitive Neurosciences



How to evaluate the quality of a document?



1 Documents are **artefacts** with which users interact

2 The **quality of a document** directly impacts the **quality of the interaction**

3 The quality of the interaction **triggers action or abstention**

Example of expert audit



- *Is the draft **navigable** ?*

Criteria	Score from 1 to 10
Structural signals	7/10
Structure of content	8/10
Chunking	9/10

- *Is the draft **understandable**?*

Criteria	Score from 1 to 10
Clarity of expression (words choices, phrasings)	8/10
Sentence length	9/10
Sentence structure	9/10

- *Is the draft **usable** ?*

Criteria	Score from 1 to 10
User-centered	9/10
Goal oriented	9/10
Simple & direct	9/10
Coherent & consistent	9/10
Action-oriented	7/10

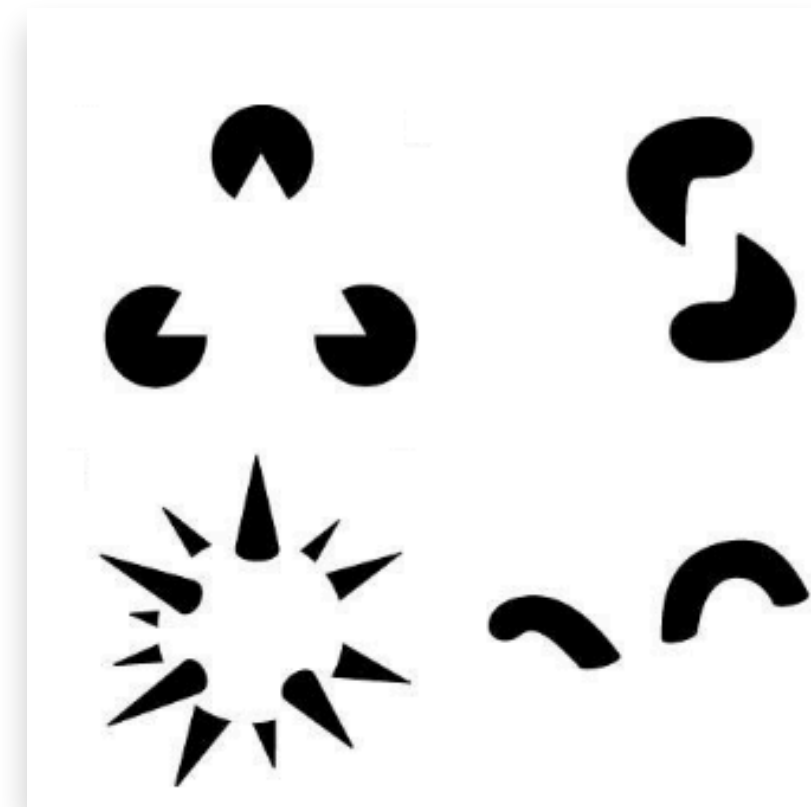
- *Is the draft **considerate**?*

Criteria	Score from 1 to 10
Tone of voice	8,5/10
Register	9/10
Projected Persona	9/10

Examples of tests with users

NEUROSCIENCES FOCUS

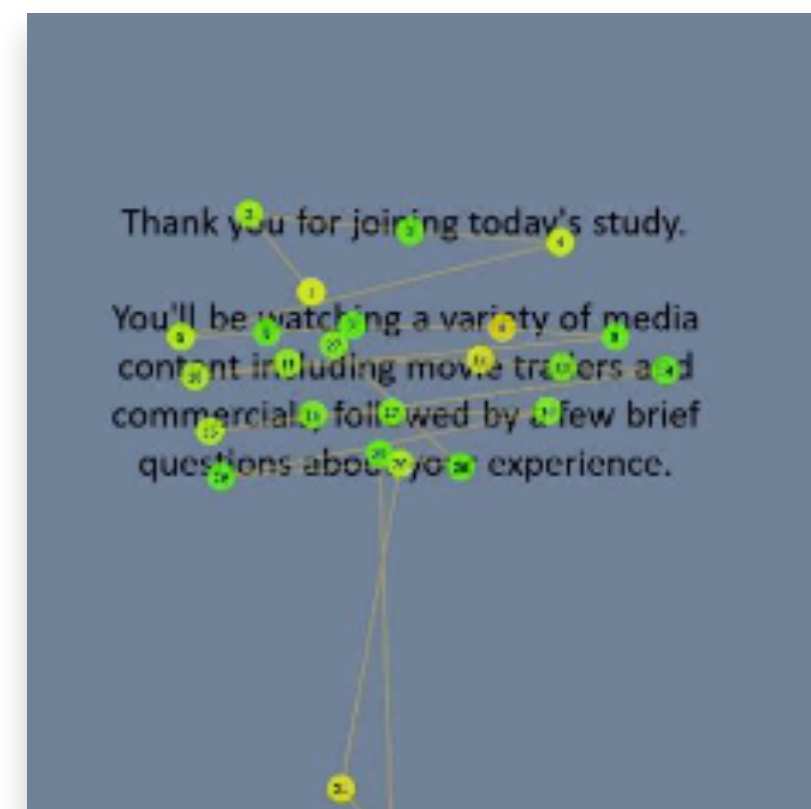
Variety of tests we can chose depending on projects and objectives



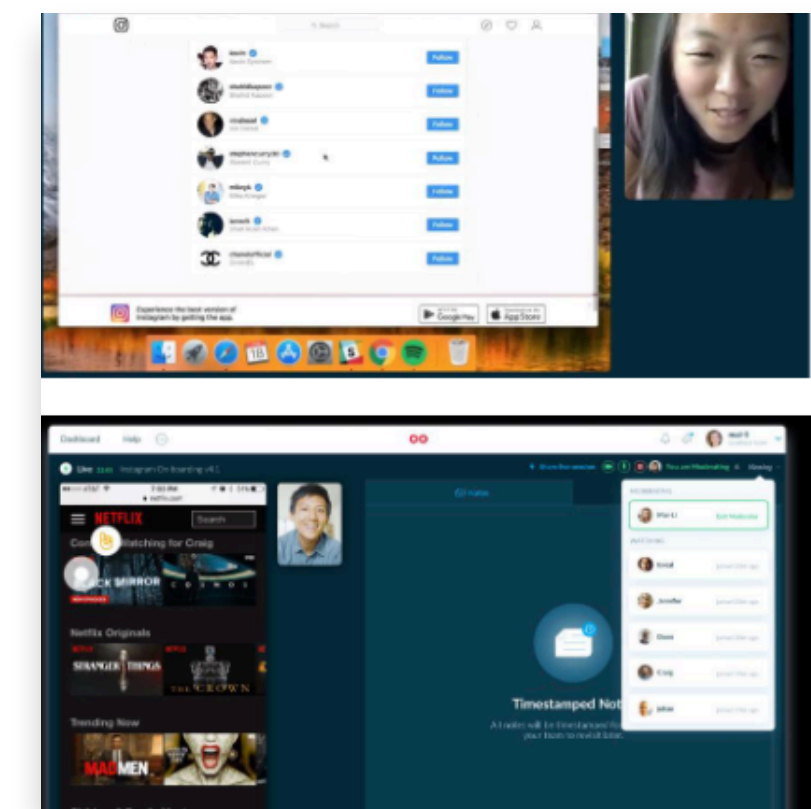
Cloze Test



5 seconds test



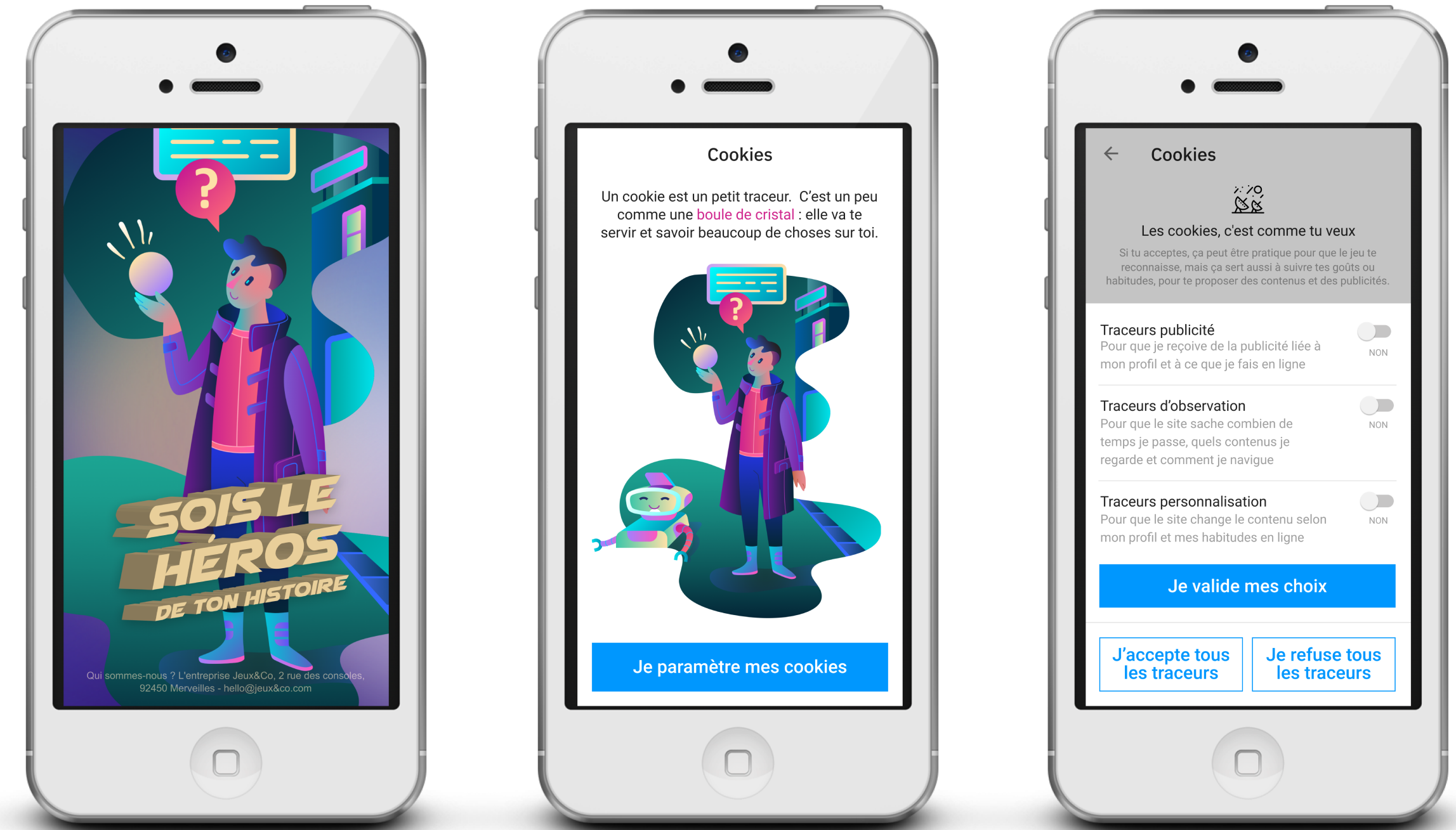
Eye Tracking



Lookback

Test protocol

- Usage scenario
- Interactive mockup (Figma)
- 6 questions
- 45 mn
- 2 testers



Usage scenario

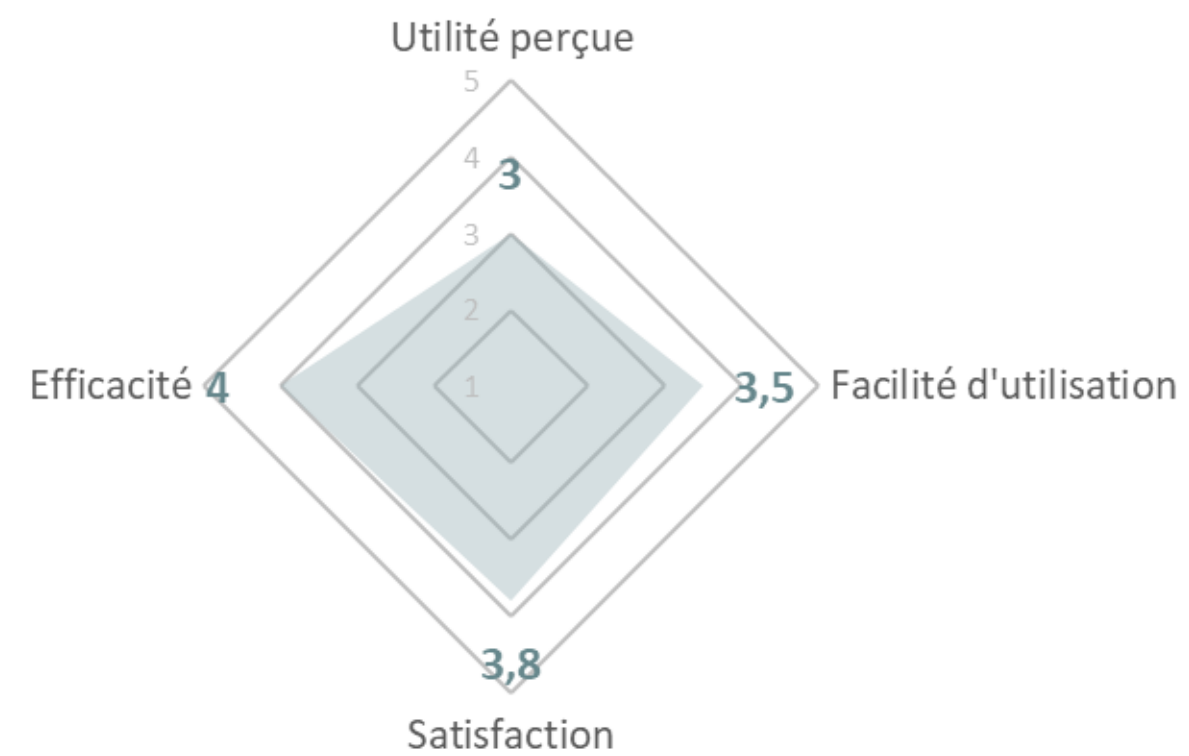
'You heard about a new video game. You download it and land on this page.

Show us what you do and say out loud what you understand and what you don't understand.

Example of results

Prototype A1

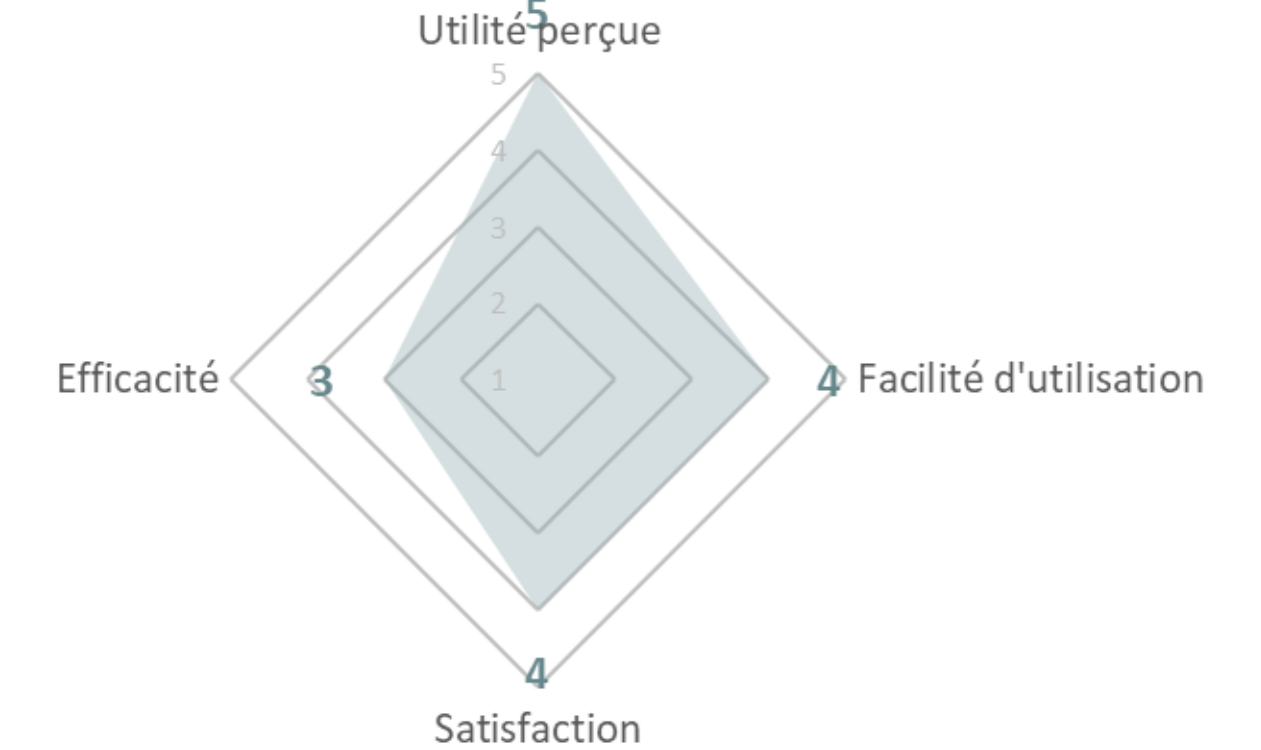
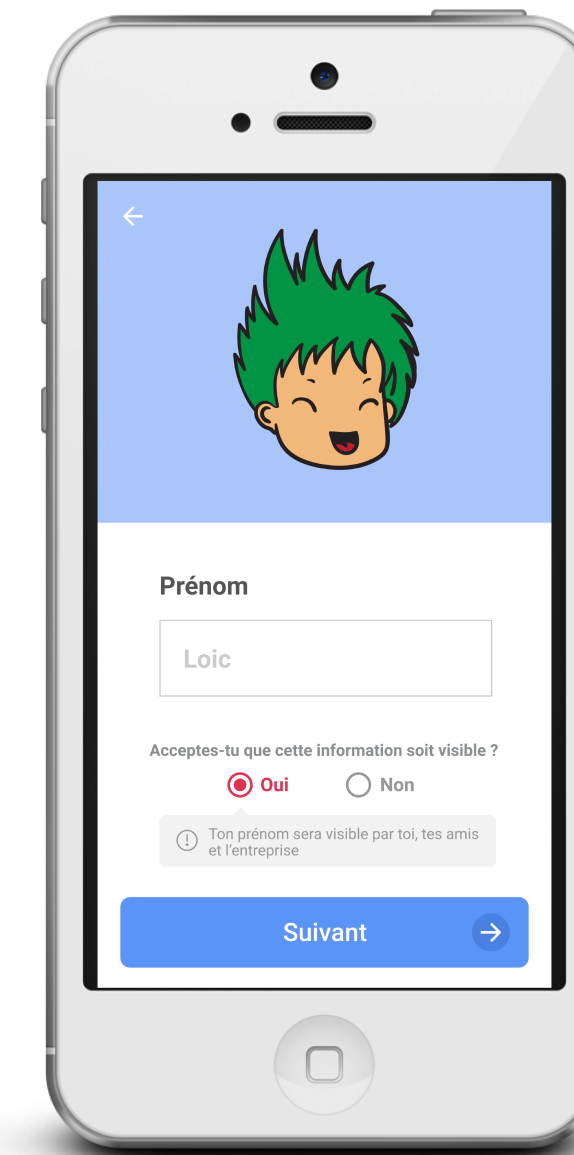
Designed for 11-14 years old



Low acceptability: 2/5

Prototype A3

Designed for 8-10 years old



High acceptability: 5/5

3 prototypes with the highest scores

In open source on Cnil's innovation lab' site

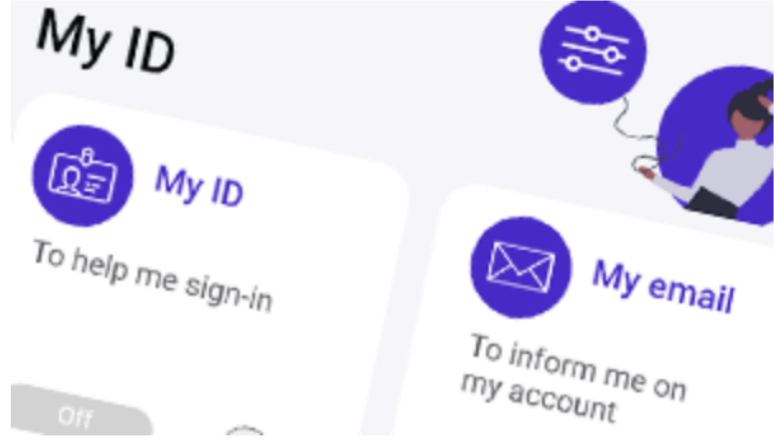
Données & Design par LINC CNIL

HOME KEY CONCEPTS CASE STUDIES RESOURCES COMMUNITY FRANÇAIS

Case Studies

Those case studies, co-created with the participants of the Données & Design workshops, illustrate ways of implementing the GDPR key concepts according to diverse use cases.

Konect

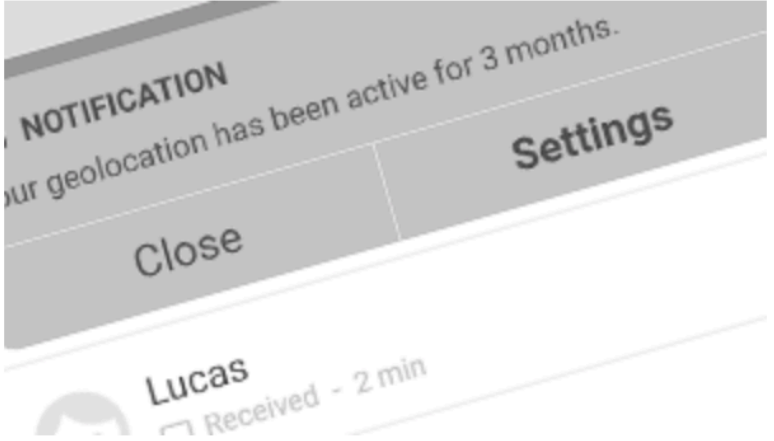


[Dashboard]

Konect is a social network providing a messaging system and is very popular among teens to share pictures and videos.

[READ](#)

Instap




[Geolocation Settings]

Instap is a social network used daily by teenagers from 15 to 17 whom get together to share pictures, videos and message with their community.

[READ](#)

Brawl Crush



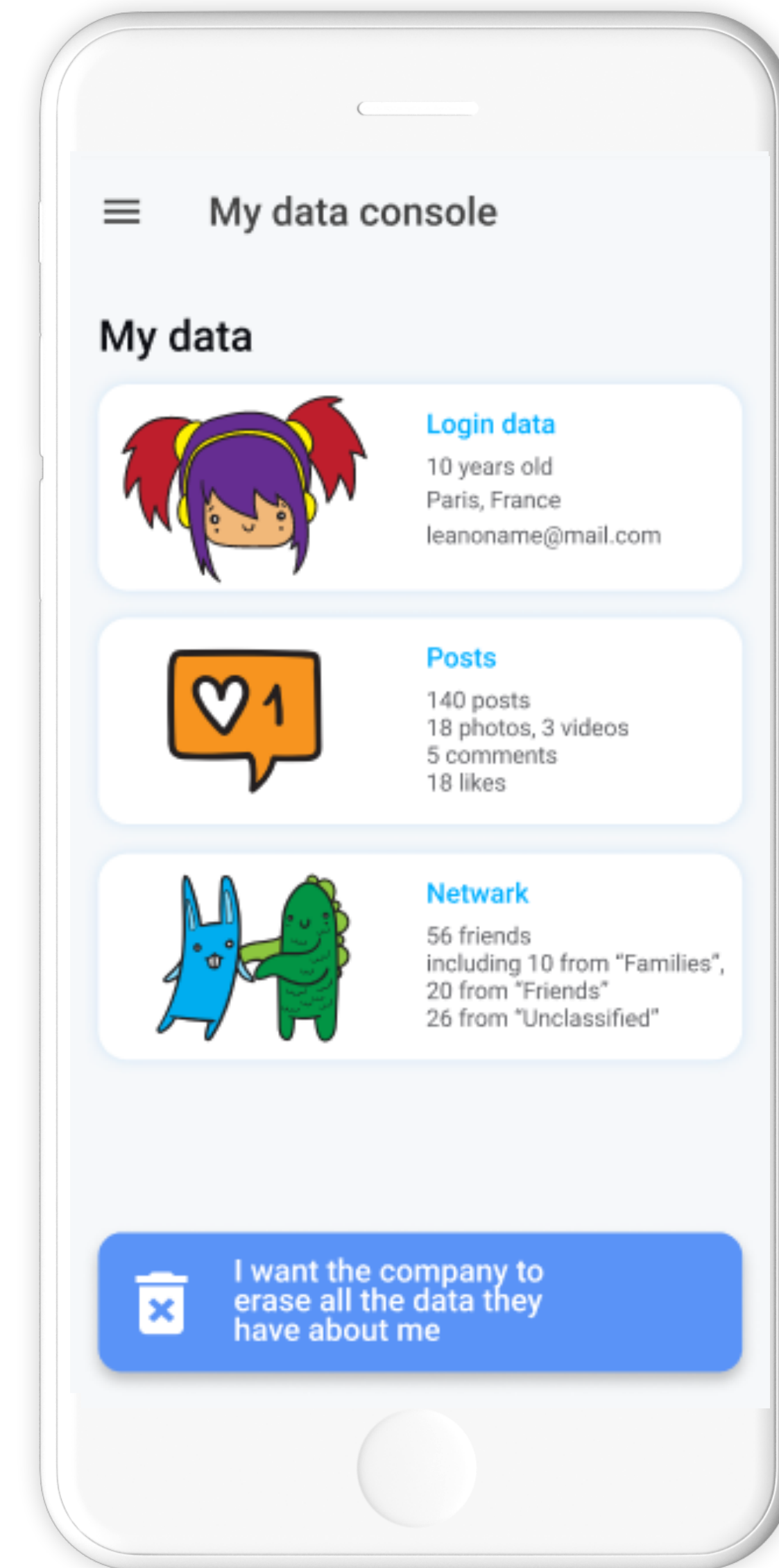
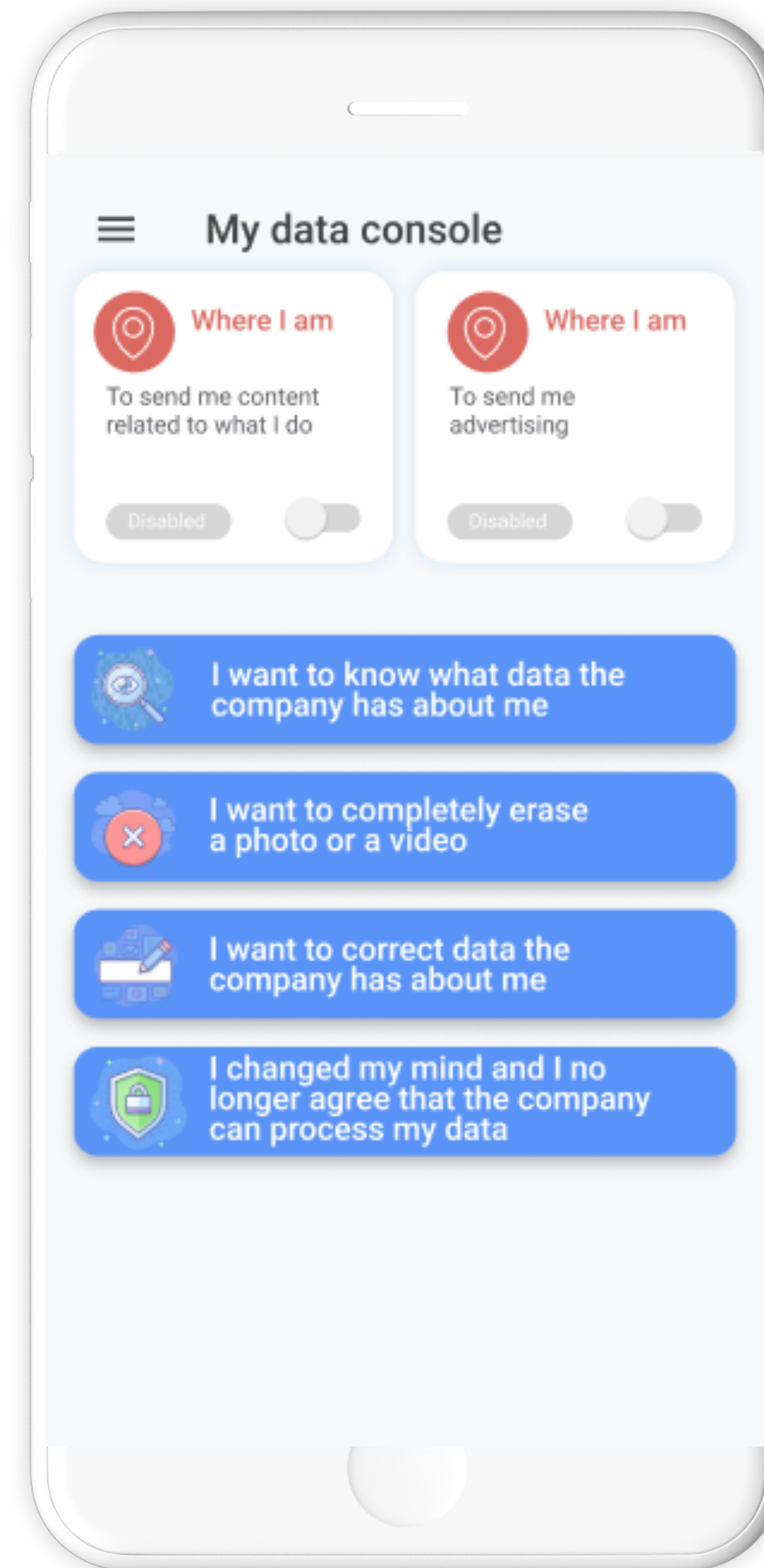
[Sign-up]

Brawl Crush is an online mobile game popular among the 8 – 10 years old. They share messages during the game and discuss it at breaks.

[READ](#)

<https://design.cnil.fr/en/case-studies/>

Example of adaptation According to age groups



CREATING OPEN SOURCE TOOLS FOR DESIGNERS

Co-building user journeys compliant with the GDPR and respectful of privacy.



Design in the GDPR

A design approach to the regulation by looking at the GDPR key concepts that can be engaged by designers.

[DISCOVER THE KEY CONCEPTS](#)



Practical examples

Be inspired by case studies, co-constructed with the community, to implement GDPR key concepts in your digital services and products.

[SEE THE CASE STUDIES](#)



Join the community

Do you wish to discuss with your peers or participate in the creation of virtuous design practices for privacy? Come and meet us at an event or join the discussions on Slack.

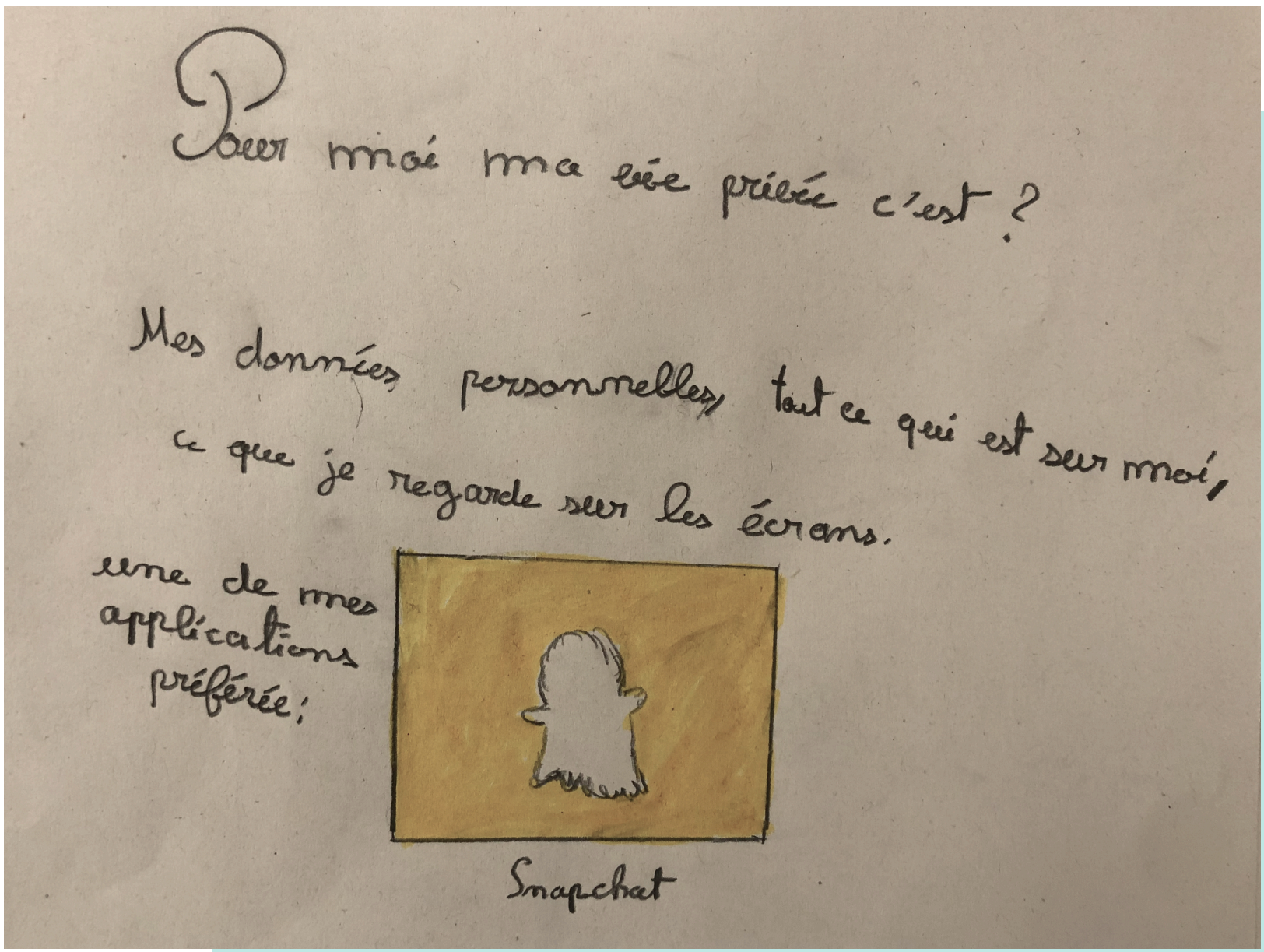
[JOIN](#)

SYSTEMIC IMPACT

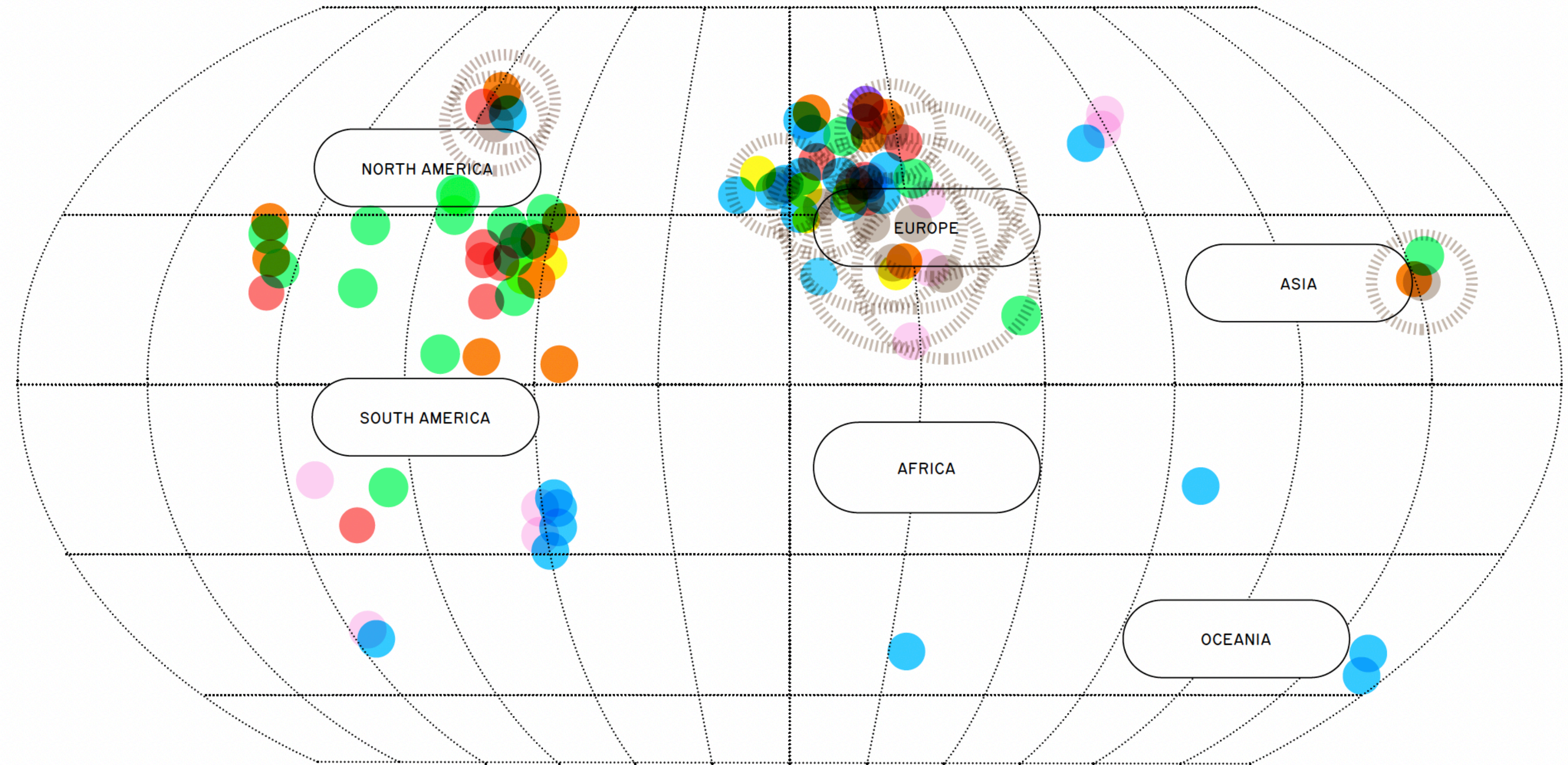
Equipping all designers with **open source kits**



Less measurable value!



LEGAL DESIGN AROUND THE WORLD

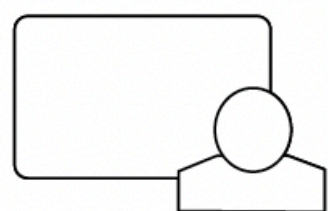


NON EXTENSIVE RESEARCH, BASED ON ANSWERS TO A SURVEY, LIMITED TO 2020 AND 2021 PROJECTS FOR PRACTICAL REASONS

This is just a starting point for further research as the legal design movement grows.

If you update this map, please let us know at hello@amurabi.eu

click on categories to see the list of current sources



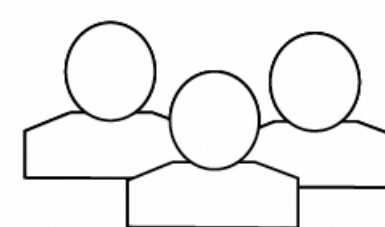
UNIVERSITIES & COURSES



LEGISLATION



LEGAL DESIGN LABS



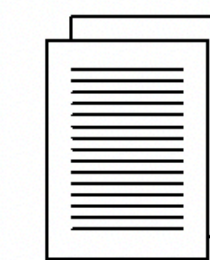
LEGAL DESIGN AGENCIES



PROJECTS



BOOKS



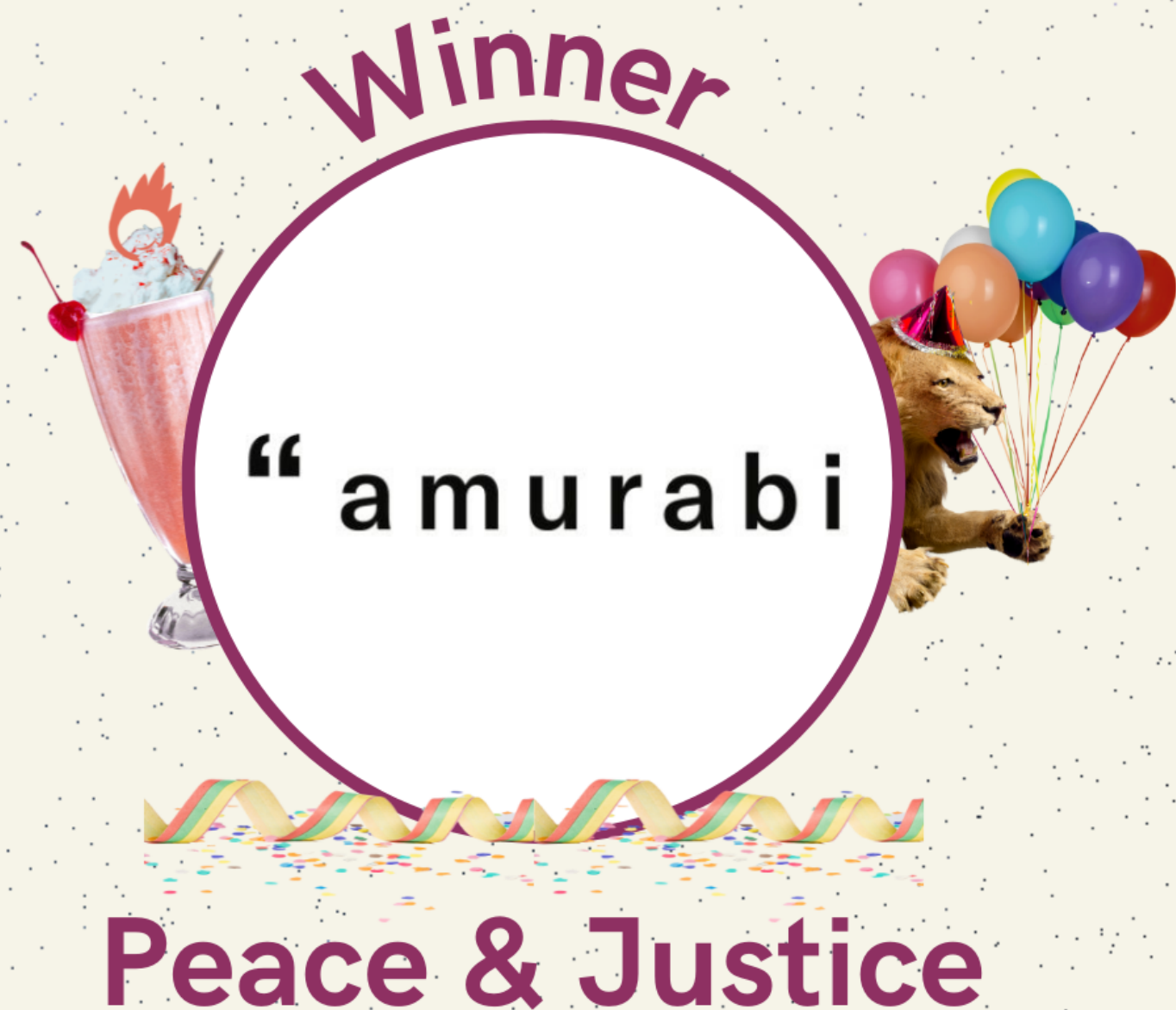
PUBLICATIONS



PODCASTS

Any

questions?



WWW.IMPACTSHAKERSAWARDS.COM

THANK YOU!

marie@amurabi.eu



**INNOVATIVE
LAWYERS 2021**

SHORTLISTED

Innovation in Sustainability & ESG

TROPHÉES
DU DROIT
P A R I S

MENTION SPÉCIALE

Legaltech : contract management

AMURABI