London, 16 October 2024

Dear info@centreforyounglives.org.uk

RE: Call for Evidence – Play Commission

Digital Futures for Children is pleased to submit its evidence to this call, with a focus on how to harness technology and the digital world to boost children's play. Our joint LSE and 5Rights research centre supports an evidence base for advocacy, facilitates dialogue between academics and policymakers, and amplifies children's voices. We adopt a rights-respecting approach to improving children's experiences of, and opportunities for, play in a digital world.

Implementing the UN Convention on the Rights of the Child in a digital world

In relation to play, our research has examined whether and how children can enjoy their right to play in a digital world (across physical and virtual contexts), also taking into account their rights to voice, privacy, safety, freedom from commercial exploitation and other rights. The research has established the conditions under which digital technologies shape children's playful opportunities in the digital environment and, crucially, how child rights-respecting design can improve these opportunities.

General comment No. 25 specifically sets out how to apply the UN Convention on the Rights of the Child in relation to the digital environment. The drafting team for the Committee on the Rights of the Child was led by Sonia Livingstone, together with the 5Rights Foundation and other experts, and informed by the early research conducted by the Digital Futures Commission (now, the Digital Futures for Children centre). On play, the text begins:

> "The digital environment promotes children's right to culture, leisure and play, which is essential for their well-being and development. Children of all ages reported that they experienced pleasure, interest and relaxation through engaging with a wide range of digital products and services of their choice, but that they were concerned that adults might not understand the importance of digital play and how it could be shared with friends." (para 106)

It then makes a series of practical and balanced recommendations for states to recognise both the risks and opportunities of the digital environment as presently designed and regulated, calling for a range of important improvements.

Playful by Design: Shaping positive possibilities for play in a digital world

Here we highlight our research on Play in a Digital World, culminating in a proposal for Playful by Design. To avoid a false offline/online binary, and to cut through today's anxious confusion about digital play, we took an unusual approach by grounding our work in children's play and the value of free (child-led) play in childhood.

In the table below we summarise our key outputs relating to defining qualities of free play in digital environments; understanding the impact of the digital environmental on possibilities for play; and bridging rights-respecting principles and industry practices.


Defining Qualities of Free Play

By reviewing research on play through history and across cultures, and evidence specifically relevant to the digital environment, we identified eight prototypical qualities of free or child-led play. Through consultation with children, parents and professionals working with children, we identified four further qualities. Together, these 12 qualities of play provide a language for what 'good' looks like for children's free play in a digital world in general and, learning from this, in the digital world.

Influences on Playful Possibilities

An ecological understanding of the digital world is important when working to improve the experiences of children and young people. Through our research, we developed a new three-part framework to understand how people, products and places support the qualities of free play and, hence shape possibilities for children's agentic play in a digital world (see Figure 1).

The design challenge is that these possibilities are realised through particular combinations of sociocultural factors (people), material-functional factors (products) and spatial-contextual factors (places). Enhancing rights-respecting free play may require multiple changes. We encapsulate this as the 'kaleidoscope of digital play' : just as a twist of the kaleidoscope generates new patterns, a change in any factor at any level will affect the possibilities for play.


Figure 1. The kaleidoscope of playful possibilities: factors that affect free play in a digital world
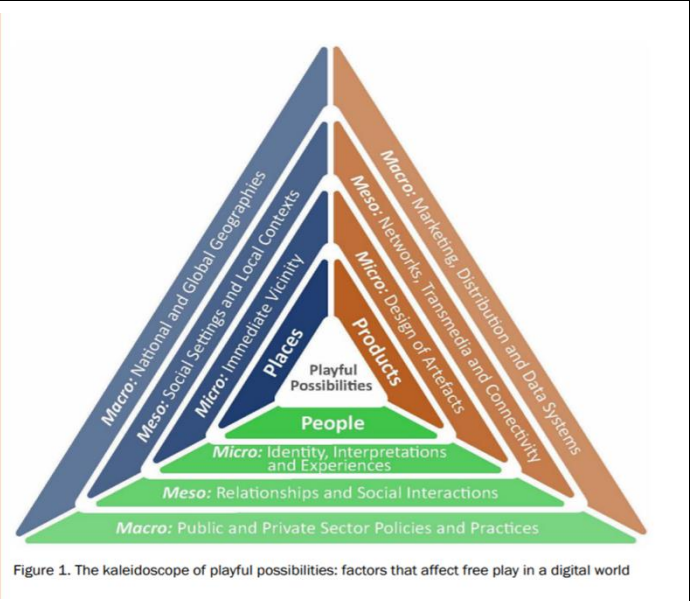
Children's Views of Digital and Nondigital Play

Children's ratings of the qualities of play they enjoy in digital and non-digital contexts are intriguingly similar, as shown in the 'spider diagram' below.

Figure 18: Children's ratings on the 12 qualities of play, for play 'in real life' and in digital contexts (% agree)
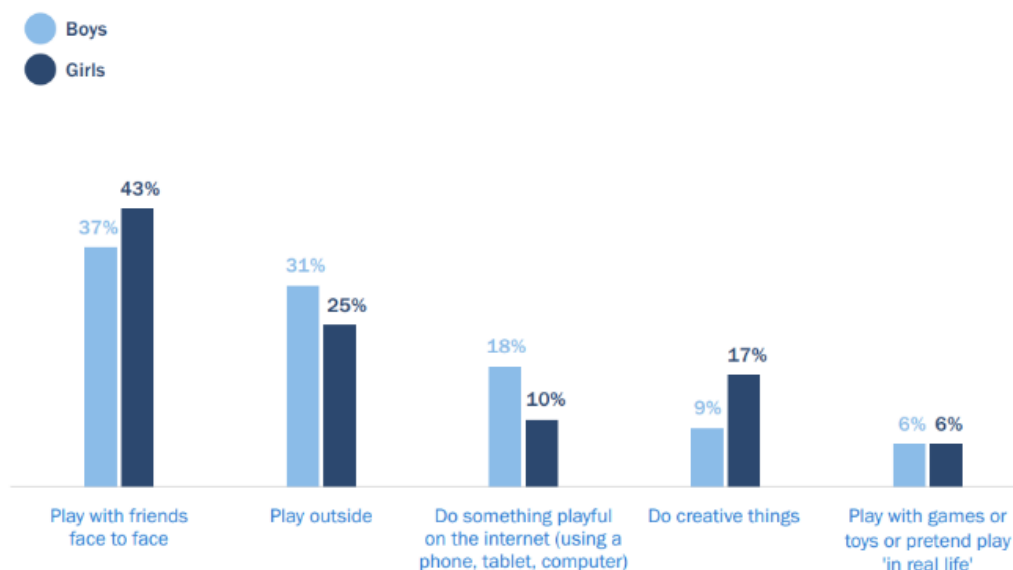*Base: 1033 6 to 17-year-olds*
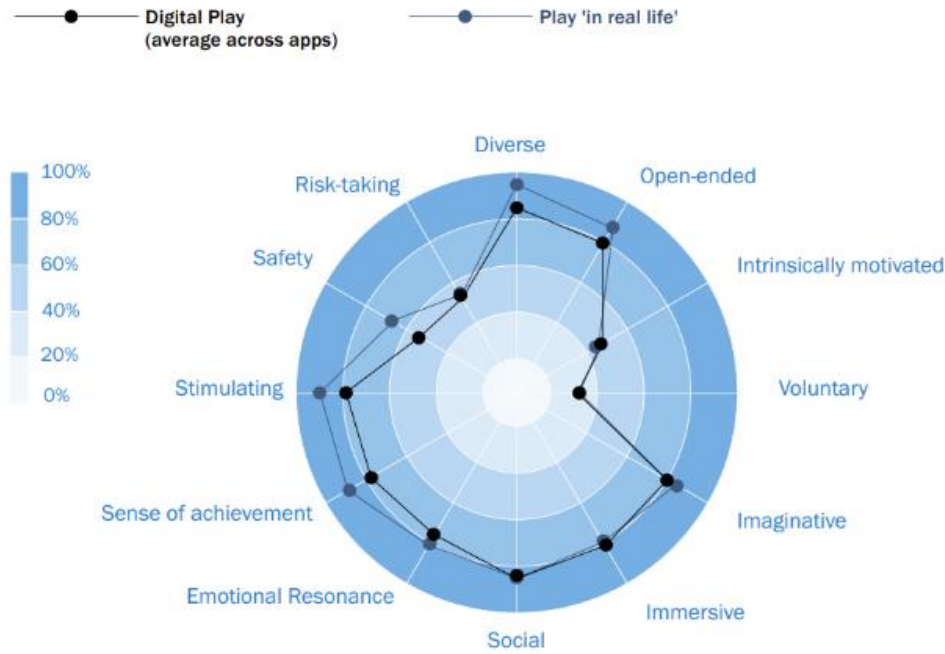
The full report also shows these findings for children's experiences of playing on Fortnite; Minecraft; Nintendo Wii; Roblox; TikTok; WhatsApp; YouTube; Zoom.

Nonetheless children want more and better offline play opportunities:

Figure 16: Which one of these activities would you like to do more often?
(Base: 1033 6 to 17-year-olds)

Further, the [research found](#) that the top demands from children aged 10–17 are:

- 62% want more features that are easy to use.
- 58% want more creative opportunities.
- 58% want more age-appropriate features.
- 56% want more affordable products and services.
- 45% want more products and services without advertising.
- 44% want better control over who can contact them in the game or app.
- 42% want more products and services that are kind, enable intergenerational
- play, and where people feel included.
- 42% want products that don't share their data with other apps or businesses.

Bridging Principles and Practice

With children, experts and product designers, we evaluated how the qualities of play that child development experts and children themselves value manifest in digital contexts. Building on their insights about the qualities of play off and online, and the correlations these qualities and the digital features that children aged 6 - 17 identified in digital services via our [online survey](#), we created our freely-available [Playful by Design Tool](#).

This tool consists of 'principle cards' which set out design considerations to embed children's rights into digital products and services. 'Prompt cards' guide design thinking and help companies focus attention on player experiences, consider design alternatives and translate ideas into actions. The 'playboards' within the tool support companies and designers to use the cards in flexible ways. As Jessie Johnson of the Design Council commented, "What a fantastic resource. We've come across a lot of these resources. This one is exceptional! It's been carefully curated in terms of the tool's design process."

This research has been published in peer-reviewed academic journals, as below.

Child rights-respecting digital products for play

[Digital play on children's terms](#) shows that, possibly unexpectedly, rights-respecting design produces more pleasure from children than either Premium or Freemium game designs, which comprise sophisticated technical features but exploit children's attention and love for stimulating interactions. This rights-respecting design combines design elements that enable

children to safely and fairly play with others in other age groups as appropriate to their evolving capacities with ease of use while allowing them to manage their information visibility to and contacts with others. These features afford children safe social interactions, according to their stage of development and evolving capacity to manage their social circle and information visibility in their play. In other words, respecting child rights online is not only desirable but also practical for businesses.

Imaginative play in digital environments demonstrates that children expect more digital features that support (constructive) social interaction with others, imagination, expression, exploration and experimentation and less of the manipulative features that undermine their agency and identity development.

Two articles explore the complexities involved in designing for children's rights and how to navigate these. *Applying children's rights to digital products* highlights the challenges designers face in balancing competing priorities relating to commercial and organisational factors, not least children's diverse requirements when designing digital products. These challenges demonstrate designers' and developers' needs for a tool to navigate these competing priorities and the Playful by Design toolkit has the potential to respond to these needs. *Playful by Design* presents a new analytical and conceptual framework for understanding the way that people, products and places impact possibilities for play in a digital world (at micro, meso and macro levels) and makes a range of recommendations for further research and innovation to improve children's experiences of play, and to Child Rights by Design.

Towards Child Rights by Design

Much would be improved if providers undertook a Child Rights Impact Assessment early in their product development, to anticipate and evaluate the impacts of policy and design on child rights and wellbeing in a holistic and practical way. We developed guidance for innovators, consulting designers, practitioners, experts and children to make it practical. Designers told us of their dilemmas about how to consult children, meet the needs of different age groups, balance protection and participation, and know when they have got it right. To find answers for them, we drew on the collected wisdom of many rights-based, ethical and value-sensitive organisations and a consultation with children around the country. Our Child Rights by Design toolkit sets out principle-based design considerations to embed children's rights into digital products and services.

In combination, this research sets out the possibilities for child rights-respecting design of the digital world but such approaches need vision, visibility, business incentives and political will. We will be happy to provide further evidence or to answer questions, if helpful.

Yours sincerely,

Professor Sonia Livingstone OBE FBA
Director, Digital Futures for Children (DFC) centre
London School of Economics and Political Science

Dr Kruakae Pothong
Visiting Research Fellow and Former 5Rights/ DFC Researcher
London School of Economics and Political Science

Dr Angela Colvert
Lecturer and Deputy Director for Innovation in School of Education
University of Sheffield, Western Bank, Sheffield S10 2TN

List of embedded inks

Focus	Resource	Link
Digital Futures for Children	Website	https://www.digital-futures-for-children.net/home
Digital Futures Commission	Website	https://digitalfuturescommission.org.uk/
General Comment 25	UN document	https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation
Play in a Digital World	Website	https://digitalfuturescommission.org.uk/play-in-a-digital-world/
Playful by Design Toolkit	Toolkit	https://digitalfuturescommission.org.uk/playful-by-design-toolkit/
A Panorama of Play: A literature review	Research report	https://digitalfuturescommission.org.uk/wp-content/uploads/2022/02/A-Panorama-of-Play-A-Literature-Review.pdf
Playful by Design: Free play in a digital world	Research report	https://digitalfuturescommission.org.uk/wp-content/uploads/2021/11/A-Vision-of-Free-Play-in-a-Digital-World.pdf
The Kaleidoscope of Play in a Digital World	Research report	https://digitalfuturescommission.org.uk/wp-content/uploads/2021/06/DFC-Digital-Play-Literature-Review.pdf
It's time to make the digital world playful by design!	Blog post	https://digitalfuturescommission.org.uk/blog/its-time-to-make-the-digital-world-playful-by-design/
How does free play manifest in a digital environment	Blog post	https://digitalfuturescommission.org.uk/blog/how-does-free-play-manifest-in-the-digital-environment/

Playful by Design: Survey report and findings	National UK survey with children	https://digitalfuturescommission.org.uk/wp-content/uploads/2021/11/DFC-Playful-by-Design-survey-report-and-findings.pdf
Children's rights through children's eyes	Report on a consultation with children	https://digitalfuturescommission.org.uk/wp-content/uploads/2023/03/July-consultation-methodology-Final.pdf
Child Rights Impact Assessment: A tool to realise children's rights in the digital environment	Report for policymakers	https://digitalfuturescommission.org.uk/wp-content/uploads/2021/03/CRIA-Report.pdf
Child Rights by Design	Toolkit for designers	https://childrightsbydesign.digitalfuturescommission.org.uk/
Child Rights by Design	Research report for practitioners	https://digitalfuturescommission.org.uk/wp-content/uploads/2023/03/CRbD_report-FINAL-Online.pdf
Livingstone, S., & Pothong, K. (2022). Imaginative play in digital environments: designing social and creative opportunities for identity formation. *Information, Communication & Society*.	Academic article (open access)	https://www.tandfonline.com/doi/full/10.1080/1369118X.2022.2046128#d1e278
Livingstone, S., Ólafsson, K., & Pothong, K. (2023). Digital play on children's terms: A child rights approach to designing digital experiences. *New Media & Society*.	Academic article (open access)	https://journals.sagepub.com/doi/10.1177/14614448231196579
Pothong, K., Colvert, A., Livingstone, S., & Pschetz, L. (2024). Applying children's rights to digital products: Exploring competing priorities in design. *Proceedings of the 23rd Annual ACM Interaction Design and Children Conference*, Delft, Netherlands.	Academic article (open access)	https://eprints.lse.ac.uk/122809/ https://dl.acm.org/doi/10.1145/3628516.3655789
Colvert, A., Pothong, K., and Livingstone, S. (2024) Playful by Design: Embedding Children's Rights into the Digital World. *ACM Games: Research and Practice*.	Academic article (open access)	https://eprints.lse.ac.uk/124301/1/Playful_by_Design_Embedding_Children_s_Rights_into_the_Digital_World..pdf https://dl.acm.org/doi/10.1145/3678469