Consultation on the ICO’s Expl*AI*n draft guidance

The ICO and The Alan Turing Institute are consulting on our co-badged ExplAIn guidance. This guidance aims to give organisations practical advice to help explain the processes, services and decisions delivered by AI, to the individuals affected by them.

We are looking for a wide range of views from organisations across all sectors and sizes.

The guidance is comprised of three parts. Depending on your level of expertise, and the make-up of your organisation, some parts may be more relevant to you than others. You can pick and choose the parts that are most useful.

You can answer as many or as few of the questions as you want to. You can also save your progress and return at a later date.

If you would like further information about the consultation, please email

[explain@ico.org.uk](mailto:explain@ico.org.uk).

Please send us your response by 17:00 on Friday 24 January 2020. You can email it to [explain@ico.org.uk](mailto:explain@ico.org.uk) or complete the [online version of this survey](https://ico.org.uk/about-the-ico/ico-and-stakeholder-consultations/ico-and-the-turing-consultation-on-explaining-ai-decisions-guidance/).

Privacy statement

Please note, your responses to this survey will be used to help us with our work on explainability only. The information will not be used to consider any regulatory action, and you may respond anonymously should you wish. For more information about what we do with personal data see our privacy notice.

1. Does the guidance provide what your organisation needs when considering how to explain AI-enabled decision to individuals?

Yes

No

Please provide further detail:

The following questions relate to ‘Part one: The basics of explaining AI’:

1. What other definitions, if any, should we cover to help inform the guidance?
2. How clear are the summaries of the relevant legislation and how they apply?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Very clear | Clear | Not clear | Not at all clear |
| GDPR |  |  |  |  |
| Equality Act 2010 |  |  |  |  |
| Judicial review |  |  |  |  |

1. What other legislation, if any, should we cover?
2. In your experience, which of the benefits and risks we have outlined are most relevant in explaining (or not explaining) AI-assisted decisions to individuals?
3. Is it clear what the different explanation types are, and why they are important for an explanation?

Yes

No

Please provide further detail:

1. What other explanation types, if any could we include?
2. We have outlined four principles:

Be accountable

Be transparent

Consider context

Reflect on impacts

Are they helpful for your organisation?

Yes

No

Please provide further detail:

The following questions relate to ‘Part two: Explaining AI in practice’

1. Are there any steps missing in the summary steps?

Yes

No

What are the missing steps?

1. Is it clear what information should go into the explanations we have described?

Yes

No

Which explanation is unclear and why?

1. What other elements of the data collection and pre-processing, that contribute to explainability, if any, should we include?
2. In step two, is it clear how you should choose your priority explanation types?

Yes

No

Please provide further detail:

1. Are the examples for choosing suitable explanation types clear?

Yes

No

Please provide further detail:

1. After reading the guidance about selecting an appropriately explainable model in step four, how helpful do you feel this will be for your work?

Very clear Clear Not clear Not at all clear

1. How clear is the guidance about the tools you can use for extracting rationale explanations and the limitations they have?

Very clear Clear Not clear Not at all clear

1. What other rationale explanation extraction tools, if any, could we include?
2. Is it clear how you should take the statistical output of the AI system and translate it into meaningful explanation?

Yes

No

Please provide further detail:

1. Step five discusses how to train staff, who implement your AI system, to interpret the outputs and apply them to the circumstances of an individual. After reading this, do you feel confident about applying this training in your organisation?

Yes

No

Please provide further detail:

We have highlighted five contextual factors that influence the kind of explanations people want about an AI-assisted decision relating to them. These have come from the research carried out with the public.

1. Do these reflect you experiences?

Yes

No

Please provide further detail:

1. What other contextual factors, if any, could we include?
2. Do the types of explanation we have suggested for each contextual factors make sense to you?

Yes

No

1. How likely are you to implement the detailed proactive engagement measures in your organisation?

Very likely Likely Unlikely Very unlikely

1. What other measures, if any, should we include?
2. Do you have any suggested changes to the healthcare example we have included in Annex 1?

The following questions relate to 'Part 3: What explaining AI means for your organisation':

1. How accurate is the characterisation of the following roles and responsibilities?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Very  accurate | Accurate | Not accurate | Very  inaccurate |
| a. Product manager |  |  |  |  |
| b. AI development team |  |  |  |  |
| c. Implementer |  |  |  |  |
| d. DPO and compliance team |  |  |  |  |
| e. Senior management |  |  |  |  |

1. What other roles and responsibilities, if any, should we include?
2. How feasible is it for you to produce policies and procedures in the areas we have listed?

Very feasible Feasible Not feasible Not at all feasible

Please comment on any specific areas.

1. What other policies and procedures, if any, should we include?
2. Is it clear what types of information you need to document?

Yes

No

1. What other types of information, if any, should we include?
2. Do you have any other comments on this guidance?
3. What sector do you work in? Please tick all that apply:

Private

Public

Third

1. What industry do you work in eg finance, health?
2. Where did you hear about this consultation?

ICO Twitter account

ICO Facebook account

ICO LinkedIn account

ICO newsletter

ICO blog

ICO staff member

Colleague

Twitter

Facebook

LinkedIn

Other

If other please specify: