

ICO Regulatory Sandbox Expression of Interest

Getting started

Please use this form to submit an Expression of Interest in participating in the ICO's Regulatory Sandbox by 31 December 2023.

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Your organisation's details

Organisation name:

Animorph Ltd

Organisation description:

Established in 2016, Animorph Co-operative has been pioneering the digital frontier, leveraging advanced technologies such as Virtual Reality (VR), Augmented Reality (AR), Mixed Reality (MR), Artificial Intelligence (AI), and web-based 3D applications to bring transformative change to the sectors of health and wellbeing. Our mission is to enhance human potential by addressing the unmet needs.

	Size: mico Legal status: company limited by guarantee Company number: 10246463
Organisation website/URL:	https://animorph.coop
ICO registration number (if applicable)	ZB237688
Where is the team developing your product or service based?	London, UK
Who will be the assigned single point of contact in your organisation for the product or service entering the Sandbox?	Name: Szczepan Orlowski Job role: Director Email address: sz@animorph.coop Telephone number: Section 40(2)
Where did you hear about the Sandbox?	Please select one of the following options: Word of mouth

Your product or service	
Product or service summary:	CrossSense is an augmented reality (AR) app for lightweight smartglasses, co-designed with people living with early-stage dementia. It produces a multisensory interface, linking objects in the environment to digital representations. These might be name-tags superimposed onto objects (e.g., "coffee machine"), or practical reminders (e.g., identifying who is in a photograph), or more subtle perceptual alterations (e.g., highlighting kitchen

	<p>danger-zones in red overlay). In this way, users collaboratively create personalised associations between objects, people and their environment using multimodal machine learning.</p> <p>CrossSense is unique among existing and emerging products in that it combines elements from the neuroscience of memory with state-of-the-art smartglasses using edge processing for sophisticated machine learning, and a hands-free, intuitive spoken language and movement interface. A friendly AI assistant, Wispy, provides gentle reminders and assistance, even for those less comfortable with technology. The app is currently in closed user testing with ethics from Section 44</p>
To which key area does your EoI relate?	Emerging technologies – combination of 'consumer healthtech' & 'immersive technology'.
What personal data will your product or service process?	CrossSense records imagery feed from smartglasses cameras to help user navigate the physical space, voice commands to help communicate with the system, and movement data to drive action for people who struggle with verbal communication.
What do you aim to achieve through Sandbox participation?	<p>Participating in The Regulatory Sandbox can provide Animorph with valuable guidance and support for developing robust policies and processes for handling sensitive user data. The data we will collect belongs to vulnerable population (people living with dementia). Here are our key objectives:</p> <ol style="list-style-type: none"> 1. Clarify UK GDPR requirements: receive guidance on how to apply regulatory requirements to data collected by smartglasses. This includes understanding how to obtain valid consent from users, how to ensure data minimisation and privacy by design, and how to implement appropriate data protection measures. 2. Develop data governance policies: we have drafted a privacy policy and data ethics framework which helped us recognise that we need help with data governance policies that comprehensively cover data collection, storage, processing, sharing, and deletion of user data.

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| | <p>3. Address ethical considerations: we want to address ethical considerations related to the use of AI in wearable assistive technologies for people living with dementia. This includes ensuring fairness, transparency, and accountability in the AI system's decision-making processes, and minimising potential biases and discrimination.</p> <p>4. Evaluate data security measures: evaluate and test our data security measures to ensure they are robust and effective in protecting sensitive user data, learn how to better mitigate potential risks.</p> <p>5. Develop incident response plans: develop incident response plans in case of data breaches or other security incidents.</p> <p>6. Understand how we could approach becoming compliant with EU AI Act.</p> |
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We would like to enter Sandbox in September 2024.

Next steps

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Your organisation's details

Organisation name:	AVID Certification Services Ltd, Unit 321B Broadstone Mill, Broadstone Road, Stockport, SK5 7DL.
Organisation description:	We test that ID & age check systems work. We are a UKAS accredited conformity assessment body operating as the Age Check Certification Scheme. We are approved by the ICO under Art 42 of UK GDPR to deliver two certification schemes, one relating to data protection for ID and age assurance services and one relating to age appropriate design. We have assisted the ICO and Section 44 with scientific research into age assurance products and services on the UK market place.

	<p>We have 10 employees and some freelance contractors. Our turnover is <£1m/year, so we would qualify as a micro entity.</p> <p>Company Registration 14865982</p> <p>This is a sole bid.</p>
Organisation website/URL:	www.accscheme.com
ICO registration number (if applicable)	ICO Registration ZB554725
Where is the team developing your product or service based?	Stockport, Greater Manchester
Who will be the assigned single point of contact in your organisation for the product or service entering the Sandbox?	<p><i>PLEASE NOTE: ALL CORRESPONDENCE RELATING TO THIS EXPRESSION OF INTEREST WILL BE SENT TO THIS CONTACT.</i></p> <p>Name: Tony Allen Job role: Chief Executive Email address: tony.allen@accscheme.com Telephone number: 07802 978749</p>
Where did you hear about the Sandbox?	<p>Please select one of the following options: ICO Referral</p> <p>If other, please specify:</p>

Your product or service	
Product or service summary:	We intend to create a global series of test assets for ID and age assurance systems. This will include for biometric images and records of children. The

	<p>unusual feature of our activity is that we are not collecting this data to use on our own systems but as presentation assets to third party systems of our clients. As such, we cannot guarantee that the data will remain within our perimeter. It is also not possible for us to know in advance who those clients may be. This presents very significant data protection, ethics and practical challenges, which we have been working our way through.</p>
To which key area does your EoI relate?	Exceptional Innovation
What personal data will your product or service process?	<p>Personal Data, Biometric Data, Gender, Race, Age and Unique Identifiers, including some disabilities of children for the purpose of presentation attack against ID and age assurance systems to test if they work.</p>
What do you aim to achieve through Sandbox participation?	<p>We have worked through the data protection challenges, ethics and practical challenges for this project with internal and external challenge. It is very complex and we believe that participation in the sandbox will help us to reach a settled position on the applicable processes, legal constraints and usability of the presentation attack assets that we plan to collect.</p> <p>We are also developing biometric deepfake attack assets, video injection attack assets and considering the complexity and scalability of attack vectors to ID and age check systems.</p> <p>Put briefly, an age check system is pretty useless if you can show it a 50p piece with a picture of His Majesty the King on it and it assesses you to be over 18. Our attacks are in gradients more complex than that but build up to presentations of genuine and real children to see if they can spoof age assurance systems.</p>

	<p>We have a DPIA, a very detailed ethics review, some advice and our own internal experts. We would like to work in a structured way with ICO experts on the approach to this problem.</p> <p>Our project would most likely fall into the first half of 2025, but we can start with it earlier if that is needed.</p>
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Your organisation's details

Organisation name:	Eclipse Digital Solutions Limited
Organisation description:	Eclipse have long established relationships with a wide range of public and private sector including Section 44 [REDACTED] and commercial organisations, in particular in the gas, oil and pharmaceutical industries.

	<p>We are a security integrator operating throughout the UK using our in-house team of highly skilled and security cleared engineers to deliver innovative, tailor made and cost effective technology solutions. The business is a private limited company (Reg No. 0414 6087) owned by the founder directors and is a SME who employs a team of 23 people.</p> <p>This is a Joint/Consortia with Geutebruck UK Limited</p> <p>Geutebruck UK are a leading innovator and supplier of digital security solutions, our systems are installed in some of the most secure and prestigious sites across the United Kingdom. Geutebruck UK are a company offering tailored solutions to meet demanding needs within complex and critical environments; using an innovative product range that combines power with flexibility.</p> <p>Geutebruck UK is a private, limited, SME (Reg no. 9774227) who employs a team of 4 people.</p> <p>We have had a trading relationship with Eclipse for nearly 20 years, supplying technology solutions into our customers and this is where the joint venture into developing healthcare innovation started during the pandemic to POC in 2023 and with a pending trial starting in an intermediate care home in January 2024.</p>
Organisation website/URL:	<p>www.eclipsedigital.co.uk www.vipatientcare.com</p>
ICO registration number (if applicable)	N/A

Where is the team developing your product or service based?	NHS Hospitals & Adult Social Care.
Who will be the assigned single point of contact in your organisation for the product or service entering the Sandbox?	Name: Section 40(2) Job role: Business Development Manager Email address: Section 40(2) Telephone number: Section 40(2)
Where did you hear about the Sandbox?	Please select one of the following options: Word of mouth

Your product or service	
Product or service summary:	<p>Visual Intelligence Fall Prevention uses Ai technology as the perfect partner to achieve its aims of reducing falls in our elderly population, using CCTV type camera's placed in bedrooms which feeds non-identifiable patient imagery to the algorithms. This is a permanent feature, thus keeping patient identity secret.</p> <p>When a patient moves in beds or chairs towards a transition to standing, an immediate on-screen alert is sent to care teams via handheld devices, creating an opportunity for targeted intervention.</p> <p>This is when most falls in the elderly occur, so targeted intervention at this stage will definitely bring about a change in the patient pathway, reducing hospital admittances, GP Interventions, Physiotherapy and the other costs associated with these injuries.</p>

Our software is very much patient centred and has been developed to provide patient data to support care teams identify individual trends and subsequently enabling changes in the level of support through the on-screen fall risk assessment which alters the level of intervention from the algorithms.

The system automatically records 30 seconds of pre-fall video footage, so that investigations can be completed quickly with appropriate control measures placed to prevent reoccurrences. This level of patient data is key to help shape future wellbeing.

This proactive approach to fall prevention is unlike others which are more App based fall predictors.

Where a CCTV systems records images permanently, our system only records "events". Movement to standing events, Fall events, Pressure Care alerts. This means that the system will not record patients, or visitors to bedrooms. Only when the algorithms are activated are any recordings saved as "events".

Because of cameras in bedrooms and the perception they are recording permanently, we recognised very early that we must place personal data security at the very heart of our system and as such we have placed a large emphasis on ensuring it is GDPR compliant using edge based technology (no export to cloud or data centre) with dual permissions and a pseudonymised (non-identifiable) approach to patient details.

We also encourage the sharing of event data with families to gain confidence in the technology and create transparency of data protection.

<p>To which key area does your EoI relate?</p>	<p>Next Generation IOT, Immersive Technology</p>
<p>What personal data will your product or service process?</p>	<p>Section 44</p> <p>The system will then only collect “events” and store them in the Event Log part of the system as previously expressed above.</p> <p>Section 44</p>
<p>What do you aim to achieve through Sandbox participation?</p>	<p>Our Aims:- To get professional help in fully understanding the impact of our system in social care environments, so that we are able to promote a professional, regulatory compliant and responsible approach to patient and public data security.</p> <p>Due to cameras being placed in bedrooms, we need to ensure patients, families, staff and visitors understand how our system saves data. Naturally</p>

	<p>everyone would assume that it is a CCTV system capturing video images 24/7. As we know, it doesn't.</p> <p>Section 44</p> <p>Your help in early 2024 in creating / understanding the DPIA process and overall data security policy would be invaluable moving Visual Intelligence into its trial, evaluation and commercialisation for the NHS.</p>
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Your organisation's details

Organisation name:	Government Digital Service, Cabinet Office
Organisation description:	The Government Digital Service (GDS) is part of the Cabinet Office and we are here to make digital government simpler, clearer and faster for everyone. GOV.UK is one of GDS' main products and aims to be the best place to find government services and information.

	<p>We are a team of around 750 product managers, software engineers, designers, user researchers, technical architects and other specialists who sit right at the heart of UK government, as part of the Cabinet Office.</p> <p>Our software products and services are used by more than 13 million people each week and are relied upon by more than 1,900 public sector organisations across central and local government, NHS and schools.</p> <p>Good digital services are better for users and cheaper for the taxpayer.</p>
Organisation website/URL:	https://www.gov.uk/government/organisations/government-digital-service/about
ICO registration number (if applicable)	Z7414053
Where is the team developing your product or service based?	London, Manchester and Bristol
Who will be the assigned single point of contact in your organisation for the product or service entering the Sandbox?	<p><i>PLEASE NOTE: ALL CORRESPONDENCE RELATING TO THIS EXPRESSION OF INTEREST WILL BE SENT TO THIS CONTACT.</i></p> <p>Name: Section 40(2)</p> <p>Job role: Section 40(2)</p> <p>Email address: Section 40(2)</p> <p>Telephone number: Section 40(2)</p>

Where did you hear about the Sandbox?	Cabinet Office DPO
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Your product or service	
Product or service summary:	<p>A conversational chatbot of GOV.UK content, specifically to advise users on business related queries. Users ask questions in natural language through a chat interface and the system searches for relevant GOV.UK pages and then attempts to answer their question using the additional context, via an Application Programming Interface (API) call to a Large Language Model. This approach is commonly known as Retrieval Augmented Generation (RAG) and is a popular approach to tailoring a LLM to a specific data source, in this case, that of GOV.UK content.</p> <p>The product is a prototype and is not to be put into production on GOV.UK. It will be used for internal testing with GDS staff and users via closed research panels. The prototype will help GDS evaluate the value of this new technology, if any.</p>
To which key area does your EoI relate?	<p>Please answer Emerging technologies (specify if: consumer healthtech/internet of things/immersive technology/decentralised finance), or Biometric processing, or Exceptional innovation.</p> <p>Exceptional innovation</p>
What personal data will your product or service process?	<p>GOV.UK content contains some personal data, such as names, emails and phone numbers. Accordingly, the conversation chatbot system is at risk of processing personal data. We propose to limit personal data processing by not using any GOV.UK data that contains personal data.</p> <p>However, due to the nature of OpenAI and Large Language Models (LLM) there will almost certainly be personal data within them resulting in the processing of personal data. We will not know what personal data is within the LLM, likely a wide range of categories, including special category data.</p>

	<p>This risk of LLMs generally was first identified in a paper by Carlini et al. (2021). The authors were able to demonstrate that they were able to attack OpenAI's gpt-2 and were able to extract (public) personally identifiable information such as names, phone numbers and emails addresses. Interestingly, the attacks prevailed in spite of some of the examples being included in just one document in the training data.</p>
<p>What do you aim to achieve through Sandbox participation?</p>	<p>The risks and opportunities of Artificial Intelligence, particularly Generative AI, are widely reported on at the moment. There has been a drive within the UK Government to be innovative in utilising new technologies to improve public services, as can be seen in the Pro-Innovation Approach to AI regulation.</p> <p>We want to explore these new opportunities to improve citizens' interactions with the government, but are mindful of the privacy risks due to the unknowns around OpenAI and Large Language Models (this is true for LLM in general, even open source LLMs). With such limited detail around the training data, model architecture and training methods, it makes it very difficult to comply with data protection legislation which could seemingly prevent us from exploring this technology. This could be a missed opportunity for the government and a poor outcome for the taxpayer.</p> <p>We would like to work with the ICO to test this new technology and be a thought leader in responsibly exploring these new opportunities. These learnings could be shared more broadly across the Cabinet Office and wider government with the help of the Central Digital and Data Office.</p> <p>The help we are seeking is around unpicking the challenging questions around how do you comply with data protection legislation when Large Language Models have scraped large swathes of data, and the owners being reluctant to share much detail of the origin of this data. We have questions around legal</p>

basis, necessity and proportionality and data subjects rights. We know these are questions being asked around the world so would like to work with a regulator for support in interpreting the legislation in this context.

We also hope to evaluate this new technology and the role it has, if any, in helping users more easily access and make sense of government information and services. In order to do this we need to consider a user's query, find relevant GOV.UK content and then pass both to a LLM, so that it can generate a response. There is a risk that personal data is processed as GOV.UK is a very large website and we do not know where all instances of personal data are on the site. We want the ICO to help us assess our mitigations and whether they are proportionate to the risk.

Regarding time scales, we have developed a proof of concept for our AI tool but would like to engage with ICO ASAP. We are conducting internal testing and evaluation. We would like to proceed to user testing with closed "business user" research panels from August.

We have a fully equipped team dedicated to this project so can proceed at pace.

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