



Use of Artificial Intelligence in Government

Written Evidence to the Public Accounts Committee

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Introduction

1. This written evidence is submitted by the Glenlead Centre, a consortium of ten independent academic researchers, delivering high-quality research and policy solutions to legislators, regulators, policymakers, public and private bodies, academia, and other stakeholders.
2. We have previously submitted evidence on artificial intelligence (AI) to the House of Lords Communications and Digital Committee, Department of Education, and United Nations. On behalf of the University of Cambridge, we have authored evidence submissions to the Joint Committee on the National Security Strategy, Office for Artificial Intelligence, Parliamentary Science and Technology Committee, Parliamentary Joint Committee on the Draft Online Safety Bill, and the Information Commissioner's Office.
3. This is an evidence submission to the Public Accounts Committee for the consultation on Use of Artificial Intelligence in Government,¹ closing Friday 3 May 2024. Our findings echo many of the findings of the report *Use of artificial intelligence in government* released by the National Audit Office ('NAO Report') in March 2024.²
4. In this evidence submission, we make the following recommendations:
 - ❖ Recommendation 1: Shift focus from industry to government departments and the delivery of public services
 - ❖ Recommendation 2: Upskill AI capabilities and build capacities in the workforce across all Government departments
 - ❖ Recommendation 3: Mandatory adoption of frameworks and standards

¹ [https://committees.parliament.uk/work/8367/use-of-artificial-intelligence-in-government/#:~:text=The%20National%20Audit%20Office%20\(NAO,making%20and%20improving%20internal%20processes.](https://committees.parliament.uk/work/8367/use-of-artificial-intelligence-in-government/#:~:text=The%20National%20Audit%20Office%20(NAO,making%20and%20improving%20internal%20processes.)

² National Audit Office, Cabinet Office, Department for Science, Innovation & Technology, *Use of artificial intelligence in government*, 12 March 2024.

Recommendations

Recommendation 1: Shift focus from industry to Government departments and the delivery of public services.

5. Our first recommendation is to delineate and clarify what role and focus the Government should have when it comes to its AI engagement. Currently, promotion of AI to industry and society seems to be the priority, while adopting AI in Government, and further on in public services, seems often secondary. We recommend a strategic shift from the first to the latter.
6. The frequent use of words such as “innovation,” “world-leading”, “incubator” and “global” in its AI rhetoric suggests that the Government’s AI ambitions are directed at and possibly even limited to engagement that could and should be done by other sectors, such as academia and industry.³ For example, research into AI should be left to research institutions and products should be developed and tested by industry.
7. AI in government should be responsible, safe, accountable, ethical, fair, legal, and (perhaps last) cost-efficient. Going forward, we recommend that the Government clarify its main priorities for the uptake of AI in government, and in so doing, ensure that these priorities focus on consistency, certainty, and transparency. Innovation, research, and global conversations cannot distract from the absence of comprehensive and properly resourced plans for the adoption of AI in government departments.

³ See for example Department for Science, Innovation & Technology and Office for Artificial Intelligence, *A pro-innovation approach to AI regulation* (white paper), 3 August 2023.

Recommendation 2: Upskill AI capabilities and build capacities of the workforce in all Government departments.

8. While we appreciate the Government's willingness to invest in taskforces, centres, initiatives, and the like, we are concerned about the lack of stability of these bodies, their overlapping remits, and their specialised foci. We are particularly concerned that these bodies are frequently formed, reformed, and often disbanded. Our second recommendation is therefore to reduce the number of centres, taskforces, and initiatives specialising in AI, and instead focus on upskilling the existing workforce in specific Government departments. We recommend the adoption of a plan such as the Biden Administration's *Executive Order*, which sets out an ambitious and comprehensive strategy for building AI capacity and capabilities across the Federal government.⁴ In our view, a similar approach should be adopted by the UK.

9. We are also concerned about the level of skills and experience in all Government departments and bodies, regardless of their specialisation. We recognise the benefits of an experienced and generalist civil service and are therefore sceptical to the recruitment and promotion of what we have encountered to be very inexperienced, junior staff to senior positions. While recognising that the civil service has expressed difficulties in competing with the private sector in recruitment, we nevertheless must emphasise that the lack of civil servant experience across competences (policy, technology, industry) may expose the British public and economy to risks, especially as research priorities, procurement and safety frameworks, and regulation may be subject to undue industry influence. A more senior, experienced, skilled, and accountable Government workforce would mitigate some of these risks.

⁴ White House, *Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence*, 30 October 2023.

Recommendation 3: Mandatory adoption of frameworks and standards

10. Our third recommendation is for the mandatory adoption by all Government departments of the guidance on *Generative AI Framework for HM Government*, published in January 2024,⁵ the *Guidelines for AI Procurement*, issued by the Office for Artificial Intelligence in 2020,⁶ and the *Algorithmic Transparency Recording Standards*.⁷
11. Current government policies leave several questions unanswered regarding technology companies' access to publicly held data, lock-in effects of embedding 'untested' AI products into the government's digital infrastructure, data ownership and stewardship, and accountability.
12. We echo the concerns expressed in the NAO Report regarding the absence of a clear accountability structure across Government for the adoption and use of AI. A cross-departmental regulatory framework that provides an overview of legal and accountability requirements, key definitions, and interaction with established legal regimes, such as data protection, should be adopted.

⁵ Cabinet Office and Central Digital & Data Office, *Generative AI Framework for HM Governance* (guidance), 18 January 2024.

⁶ Office for Artificial Intelligence, *Guidelines for AI procurement*, June 2020.

⁷ Central Digital & Data Office and Department for Science, Innovation & Technology, *Algorithmic Transparency Recording Standard – Guidance for Public Sector Bodies* (guidance), 5 January 2023.

References

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