

# Collaborating with Residents on the Use of Automated Decision-Making

**Overview** Building collaboration with residents around the use of automated decision-making – working in partnership to develop trusted principles for public sector practice.

**Client:** Greater Manchester Combined Authority (GMCA)

**Project Duration:** October 2023 – May 2024

**Scope:** To create a set of principles outlining how public sector organisations should engage with residents when using Automated Decision-Making (ADM) tools.

**Methodology:**

- Scoping interviews
- Desk research
- Two online and two offline idea generation workshops
- Developing and iterating principles based on what we heard, gathering feedback on early drafts through online comments and a follow-up online workshop.

**Key Areas Explored:**

- Automated Decision-Making technologies and AI in the public sector
- Public engagement and collaboration
- Building trust
- Rights, Fairness, and Redress
- Equality and Diversity
- Bias
- Information Governance

**Key Outcomes:**

A set of 13 concise principles with supporting details, developed collaboratively by diverse stakeholders from within and outside the public sector. These publicly available principles aim to establish trusted, ambitious, yet realistic standards for guiding practice and ensuring accountability in the use of automated decision-making technologies.

**Impact:**

The principles were officially launched on the GMCA website on July 30th, with support from Councillor Nicholas Peel, GMCA Lead for Digital City-Region. The GMCA is actively promoting their implementation across public sector organisations. These principles, developed collaboratively by over 30 diverse stakeholders, are publicly available for adaptation and use by other organisations, fostering wider public collaboration in the use of automated decision-making technologies.

## Introduction

Algorithmic tools follow set rules (called algorithms) to turn data fed into them into outputs. Algorithms, including complicated AI systems, are playing an increasing role in decision making in the public sector. We have used the term ‘automated decision-making (ADM) system’ to refer to any use of an algorithmic tool that has a significant impact on how a decision is made. This covers a wide range of tools, from those following straightforward rules to complicated systems that use artificial intelligence or machine learning. It also covers a range of ways that humans are (or are not) involved in the process of making decisions, or in designing, training, maintaining, and reviewing these systems.

Automated systems like these can bring many benefits around accuracy and efficiency – for example [they have been used successfully in cancer diagnoses](#). But there are also risks if there is not enough scrutiny over the data used and whether it is being used in a suitable way. Uses that have been criticised include [the use of nationality as part of screening visa applications](#), and [the use ‘predictive policing’ in the US](#).

We believe that collaborating with residents will be vital for ensuring these systems are used appropriately. To grow this practice, we proposed developing a straightforward set of principles for how public sector organisations should collaborate with residents when these technologies are used. These would be created in partnership with people within and outside the public sector to create something that is impactful, feasible and trusted.

This idea emerged out of conversations with Foxglove Legal, and Open Data Manchester received funding from the Greater Manchester Combined Authority to develop these principles.

There is a wide range of evolving legislation and guidance relating to the use of automated decision-making systems and the public engagement that should surround this. This includes: the Data Protection Act 2018, The Equality Act 2010, The Human Rights Act 1998, and the UK Government’s Algorithmic Transparency Recording Standard. Our aim was to focus on creating something straightforward that would push practice forward, providing useful guidance to the range of people thinking about using these technologies in the public sector, and helping those outside the public sector to hold them to account.

## The Project

Our aim was to create a set of principles outlining how public sector organisations should engage with residents when using Automated Decision-Making (ADM) tools. These needed to provide feasible yet impactful standards with widespread acceptance. To achieve this, they would be created in partnership with a diverse mix of people with a stake in how ADM tools are used – both within and outside the public sector. Our immediate focus was the public sector in Greater Manchester, but we aimed to create principles that could be adapted and applied to other places and contexts.

## Methodology

Our approach to developing and refining the principles combined diverse research methods with collaborative workshops, ensuring a comprehensive and inclusive process.

We first carried out a handful of **scoping interviews** to understand more about how organisations are currently approaching the use of these technologies, what standards are already in place, and who would be important to hear from to develop a set of principles. We spoke to people in Greater Manchester from within local authorities, the NHS, the GMCA, and the VCSE sector. We also carried out **desk research** into existing good practice, legal frameworks and guidance.

We then delivered two online and two offline **workshops to gather suggested principles**. These events were advertised to people who were likely to have an interest in this topic, using relevant local networks such as the Greater Manchester Equality Alliance.

In total 30 people took part across 4 workshops, roughly half of whom worked in the public sector. Those within the public sector tended to have responsibilities around information governance. Those outside the public sector included people with an interest in data and artificial intelligence; community engagement around this topic; and equality, diversity and inclusion.

We used some examples of ADM systems to start a conversation about the risks and benefits of their use. Then we asked about why public engagement was important in this context, what participants hoped it would look like, and what they feared it might end up looking like. Finally, we asked participants to draw from this discussion to think about what should be in a set of principles.

These **suggested principles were grouped into common themes and used as the basis for drafting a set of principles**, alongside other outputs from the workshop. In some cases, our team had to use our own judgement to move from these outputs into a clear and coherent set of principles.

These **draft principles were then iterated over a series of rounds of feedback**.

Firstly, we shared them back with workshop participants by email, and gathered feedback through comments on this google doc alongside comments emailed directly to us. We then used these suggestions to create a new draft of the principles which was discussed at a follow-up online event which we opened up to people beyond Greater Manchester with an interest in this topic. What we heard during the event was then used to make some final edits which we shared back with participants before the final version was published.

We received 59 comments, replies to comments, or suggested edits, on the google doc. In addition, 3 people emailed to share feedback. 38 people joined the online event to hear about the draft principles and share their feedback. These participants were in general a mixture of people who had taken part in the original workshops, others within the public sector in Greater Manchester, and some people from beyond Greater Manchester with an interest in data and artificial intelligence.

Throughout this process we focussed on being transparent about how the principles were taking shape. We published the miro board that we used to theme participants'

suggestions and develop these into a set of principles. The first draft of the principles, and participants' comments on this, were shared publicly online.

## Challenges

A crucial challenge with this project was striking a balance between creating principles that were ambitious and would push practice forwards, whilst remaining feasible and providing clear guidance to practitioners. We decided to target some workshops towards the public sector to try and encourage civil servants to feel comfortable sharing concerns about what was realistic in a safer space. We also actively elicited these concerns from participants by asking what they feared public engagement might look like, as well as what they hoped it would look like.

Whilst we asked participants to suggest principles themselves during the workshops, our research team held the pen when it came to drawing these together into a clear set of principles based on their ideas. We then shared these back for feedback and iterated them based on what we heard, whilst being transparent about how we'd drawn these together and where we'd used our own judgement. One of the hardest aspects of drawing the principles together was being precise around how we defined ADM systems, and when particular duties would apply. Drawing from language used in the UK Government's Algorithmic Transparency Standard proved useful for this – and we highlighted this influence within the text of the principles themselves.

## Findings and Insights

Some of the key points that came up, which informed the final principles, were:

- Focussing on the positives of these technologies as well as the risks
- Making engagement relatable and understandable
- The value of human oversight
- The importance of transparency about how these technologies are being used
- The importance of inclusion and tackling bias
- Accountability and means of redress

## Impact

Our aim is that the principles promote an ambitious but feasible standard that provides guidance to those within the public sector, and can be used by others to hold the sector to account. We also hope that these principles will be taken up beyond the public sector.

The principles were published on the Greater Manchester Combined Authority's website on 30<sup>th</sup> July 2024. In a press release accompanying their publication Councillor Nicholas Peel, GMCA Lead for Digital City-Region and Champion for the GM Information Strategy, said:

“Algorithms like automated decision-making systems are becoming increasingly popular in the public sector. However, it is important that they are used appropriately and that the public have confidence and trust in organisations that these systems are being used in this way.

We have worked with Open Data Manchester to develop a set of principles that can be used to support this best practice, no matter what type of organisation you may be. We want to support businesses and organisations across Greater Manchester to ensure appropriate standards of accountability and responsibility to build a better information ecosystem for us all.”

At time of writing our partners at the GMCA were working with the Greater Manchester Information Board to encourage public sector organisations to sign up to the principles.

Through the process of creating these principles we have brought together a wide range of people interested in the appropriate use of these technologies and encouraged them to reflect together on agreed standards of practice. By demonstrating how this process has worked we hope to have arrived at a set of principles that will have receive widespread acceptance and trust. We hope this helps also grow further conversations about, and reflections on, the impacts of these emerging technologies at a time of rapid technological change. We have explicitly included in the principles a call for the community to come together again in the future to ensure these standards remain up to date and are put into practice.

## Conclusion

We are hugely grateful to both the Greater Manchester Combined Authority and the wider community of people who helped create these principles for their commitment to developing and advancing these principles.

We hope these principles will help a wide range of organisations to reflect on their practice and institute high standards, alongside providing a benchmark that can be used to hold organisations to account.

We look forward to hearing from anyone interested in supporting their own organisation to sign up to these principles or in adapting them to other contexts. If you would like to speak to us about this, or find out more about the project please contact:

[mat@opendatatmanchester.org.uk](mailto:mat@opendatatmanchester.org.uk)

## Testimonial:

*“Being part of creating the principles was an enlightening and enjoyable process - I discovered many ways that people experience and positively interact with AI technology. What really came across was how much we all care about having systems that are accessible and inclusive - and that there is transparency to enable people to be confident about using them and clear about their purpose.”*

Alison Green - participant