



Response from the Ada Lovelace Institute to Department for Culture, Media and Sport consultation on the Centre for Data Ethics and Innovation, 5 September 2018

About the Nuffield Foundation and the Ada Lovelace Institute

The Nuffield Foundation is an independent charitable trust that funds research, analysis, and student programmes to advance social well-being across the UK. The research it funds aims to improve the design and operation of social policy, particularly in Education, Welfare, and Justice. The Foundation's student programmes provide opportunities for young people to develop their skills and confidence in quantitative and scientific methods.

The Foundation has long been at the forefront of addressing the ethical questions raised by scientific advancements. In 1991, it established the Nuffield Council on Bioethics, which has been influential in establishing ethical frameworks for policy and regulation relating to innovations in biology and medicine. The Foundation is now establishing the Ada Lovelace Institute (Ada) with a commitment of £5million over five years. Ada is an independent research and deliberative body, with a mission to ensure data and artificial intelligence work for people and society.

Ada has been created with the support of founding partners: The Alan Turing Institute, Royal Society, British Academy, The Royal Statistical Society, Wellcome Trust, the Omidyar Network's Citizens and Governance programme, techUK and the Nuffield Council on Bioethics.

The Institute is named after the mathematician Ada Lovelace, who wrote in visionary terms about computing and its application in the wider world.

Q1 Do you agree with the proposed role and objectives for the Centre for Data Ethics and Innovation?

We agree with the Centre's proposed role, and its draft terms of reference, and suggest that changes to this should only be modest.

The [consultation document](#) appropriately signals the breadth of the institutional landscape, which encompasses regulators; research institutes, learned societies and think tanks; businesses and public bodies; citizens, consumers and civil society; and global opportunities. The Ada Lovelace Institute (Ada) similarly recognises that there is work of a high standard being undertaken by a range of civil society organisations, think-tanks, academia, policy and public service organisations, at the national and international level. We will seek to build on, connect with and, where appropriate, amplify such research. Our plans articulate three core aims to (1) Build evidence and foster rigorous research and debate on

how data and AI affect society as a whole, and different groups within it, (2) Convene diverse voices to create a shared understanding of the ethical issues arising from data and AI, (3) Define and inform good practice in the design and deployment of data and AI.

We are particularly interested in the Centre's plans to interact with the regulatory landscape. The consultation document proposes close working with regulators to identify how and in what ways the ethical and governance challenges posed by data and AI go beyond current law and practice, and to determine how and in what ways those challenges can best be addressed. This suggests an important new mechanism by which to prioritise those questions of imminent political, public and national interest. Our forward planning articulates that such issues that are readily identifiable should be primarily the concern of government, regulatory and practitioner bodies. Ada would complement the emerging area of regulatory forethought from a position of independence, prioritising long term and rigorous foundations in research, deliberation and good practice. We expect to harness Ada's growing support for a body of wider work, and its development of networks, to share new and emerging insights to the Centre and to the public in a public evidence base.

Q2 How best can the Centre work with other institutions to ensure safe and ethical innovation in the use of data and AI? Which specific organisations or initiatives should it engage with?

We note and strongly welcome the proposal, p. 11, that alongside other research organisations and regulators, our two organisations should work closely alongside each other. We look forward to continuing our work in this light.

No single centre will capture every dimension of 'data ethics and innovation' and although excellence may be fostered in particular locations, the effectiveness of ethical forethought for data and AI will be dependent on broad-based outreach and engagement.

The UK has a strong selection of organisations with an interest in developing the data and digital economy in support of broader social and economic interests, from Catapult Centres supporting firms, to a broad range of university centres for data science or ethics from the South East and South West to the North of England, Scotland and Wales, the Turing Institute and its associated institutions, to learned societies, professional bodies and research councils, think tanks and consultants, public bodies, and private research groups.

Working and thinking on ethics also has a strong presence internationally. International conferences on data science, and new national strategies for artificial intelligence, increasingly address the subject of ethics, public trust, and regulation.

The draft terms of reference propose that the Centre should report regularly to parliament. We perceive that a breadth of policy-focused evidence-gathering will need to precede such reports, and we believe that if close working with the most relevant parliamentary select committee can be achieved and maintained, it would assist toward this goal.

The Centre's ability to report regularly to Parliament, and expect an annual response provides it a unique opportunity to shape the research priorities and agenda for both the Centre and for Parliament, should it wish to do so.

We look forward to supporting broad-based, public, and leading-edge participation in addressing questions that are likely to be of global concern.

Q3 What activities should the Centre undertake? Do you agree with the types of activities proposed?

We agree with the activities, but would support further development of the detail, to be informed by wider evidence and experience.

Public deliberation methods such as citizen juries are mentioned in the consultation document. These have been shown to be of particular value when seeking informed public perspectives on complex and controversial policy and in bringing experts, politicians, civil society organisations and members of the public together to deliberate on pressing questions. However, citizen juries may not be suitable for all of the types of questions the Centre might wish to ask of citizens and civil society. The Centre could invite and encourage academic and professional insight, internationally and in the UK, to a range of different methods and their implementation. The Centre could also draw guidance from past and present UK government initiatives which have sought to engage the public, to an enviable breadth and depth, in science and innovation policy and ethics.

Q8 How should the Centre deliver its recommendations to government? Should the Centre make its activities and recommendations public?

We agree that the Centre should report to parliament, ideally also with a relationship to the most relevant select committee, and that it should make its activities and its recommendations public.

Response submitted 5th September 2018