

Role of Governments in ensuring transparency and accountability of artificial intelligence systems in public administration (item 6)

Remarks by Mr. Fadi Salem, Director, Policy Research Department, Mohammed Bin Rashid School of Government

I appreciate the chance to review and provide feedback on this well-organized paper regarding the transparency and accountability of artificial intelligence systems in public administration. The paper suggests empowering Supreme Audit Institutions (SAIs) to utilize AI systems and to audit their application by government bodies as a means of enhancing AI accountability.

Today, governments have the dual responsibility of overseeing the responsible use of AI within their societies and economies, while also ensuring their own responsible use of AI. This entails:

- 1) developing and adhering to ethical principles for responsible AI,
- 2) aligning with global AI assurance and governance frameworks in a compatible manner, and
- 3) implementing compliance measures both internally and externally. This is a complex task.

Currently, there is no playbook yet on what works in which context, and at each AI maturity stage.

Essentially, the paper identifies two significant global gaps:

1 - Shortcomings in AI risk assessment mechanisms: There is a worldwide lack of effective methods for evaluating the key risks and challenges posed by artificial intelligence, which the paper thoroughly examines.

2 - Insufficient Response Mechanisms to tackle these risks: There is a notable absence of practical assurance responses and measures for the ethical and responsible application of AI across the governance landscape.

By design, the paper adopts a **risk-based perspective** in addressing this issue. **Can we broaden this perspective?**

I would like to propose a few thoughts in response to the recommendations outlined in the final section of the paper, considering the current global context. In doing so, I will briefly highlight several related policy research projects we have been conducting at the School on AI governance. Our research has consistently identified these critical gaps in the global south, influenced by various factors and broader implications. The School continues to lead numerous policy research initiatives on AI Governance in the Global South, in addition to capacity building in various aspects of AI governance across countries in the region. The responses I will share are informed by seven key projects I led over the past two years:

- 1- The Certified AI Ethics Assessors in government in collaboration with IEEE, including thematic AI ethics assurance (e.g. AI in Financial Systems, in Healthcare).
- 2- A global mapping of AI safety gaps and solutions through the Global Risk and AI Safety Preparedness (GRASP) Initiative, in partnership with the OECD Global Partnership on AI and the Future of Life Institute.
- 3- Inclusion of the Global South in global AI governance ecosystems, in collaboration with Google.org.
- 4- AI ecosystems (SMEs and Startups) with papers presented at the IGF 2024 and 2025.
- 5- AI governance capacity building in the MENA region with UNDP.
- 6- Developing generative AI principles for research and education.
- 7- The work of the IGF Policy Network of Artificial Intelligence (PNAI) focusing on the global south.

Are Supreme Audit Institutions (SAIs) adequate? How can we effectively address AI transparency and accountability in public administration amidst such complexity? The following suggestions may enhance the paper's capacity to tackle this question with a broader impact, particularly concerning the global south:

1- Recognizing the critique of audit processes (including AI): It is crucial to acknowledge the limitations of audit processes as a singular accountability measure. Without integration into a broader AI governance ecosystem, AI audits may become superficial, leading to the prevalence of "AI ethics washing" due to the limited capacity and talent in many governments.

2- The tensions and trade-offs between promoting AI innovation and enforcing controls, and how this tension influences accountability and transparency questions, **particularly among emerging AI leaders in the global south.** This is especially relevant for countries that are data-poor or lagging in the AI maturity scale. Our research indicates that various trade-offs are being navigated by governments in the global south, depending on their AI/data/digital maturity. Some countries are intentionally sacrificing AI safeguards as they believe it hinders their ability to catch up with AI leaders. Here, the framework of CEPA principles of Public Governance could be applied.

3- How can we transition from principles/guidelines to practical AI assurance (enforcement and compliance) beyond high-level guidelines? National AI ethics certification programmes offer valuable examples.

4- Are national audit institutions sufficient? I argue they are not, given emerging global practices. Two additional types of institutions should play a leading role in the AI governance framework alongside the SAIs:

First: Schools of Government can significantly contribute to AI governance and address questions of AI accountability and transparency by:

- a) Demystifying AI ethics and responsible AI applications for public sector organizations,
- b) Building practical capacity,
- c) Conducting research on actual AI governance behaviors, documenting effective practices in context, and extracting practical knowledge,
- d) Creating a safe space for policy discussions among all stakeholders regarding AI governance.

Second: National AI Safety Institutes (AISIs): The growing trend of government-supported entities established to evaluate and ensure AI safety. They conduct independent safety evaluations, risk identification and mitigation, develop testing and evaluation protocols, establish guidelines and standards, promote research and innovation in AI safety, facilitate collaboration and information sharing, and inform policy and regulation.

Addressing AI governance implications, including accountability and transparency needs to build on the complementarities between AI Safety Institutes, Schools of Government and Supreme Audit Institutions (SAIs).