

Algorithmic Impact Assessment Results

Version: 0.8

Name of Respondent

W Herbert

Job Title

Senior Analyst

Department

Treasury Board Secretariat

Branch

CIOB

Project Title

ATIP Digital Services

Project Phase

Implementation

[Points: 0]

Please provide a project description:

Simple central website for Canadians to submit ATIP requests

What is motivating your team to introduce automation into this decision-making process? (Check all that apply)

Improve overall quality of decisions

Use innovative approaches

Please check which of the following capabilities apply to your system.

Text and speech analysis: Analyzing large data sets to recognize, process, and tag text, speech, voice, and make recommendations based on the tagging

Content generation: Analyzing large data sets to categorize, process, triage, personalize, and serve specific content for specific contexts

Section 1: Impact Level : 2

Current Score: 33

Raw Impact Score: 39

Mitigation Score: 36

Section 2: Requirements Specific to Impact Level 2

Peer Review

At least one of: Qualified expert from a federal, provincial, territorial or municipal government institution. Qualified members of faculty of a post-secondary institution. Qualified researchers from a relevant non-governmental organization. Contracted third-party vendor with a related specialization. Publishing specifications of the Automated Decision System in a peer-reviewed journal. A data and automation advisory board specified by Treasury Board Secretariat.

Notice

Plain language notice posted on the program or service website.

Human-in-the-loop for decisions

Decisions may be rendered without direct human involvement.

Explanation Requirement

In addition to any applicable legislative requirement, ensuring that a meaningful explanation is provided upon request for any decision that resulted in the denial of a benefit, a service, or other regulatory action.

Testing

Before going into production, develop the appropriate processes to ensure that training data is tested for unintended data biases and other factors that may unfairly impact the outcomes. Ensure that data being used by the Automated Decision System is routinely tested to ensure that it is still relevant, accurate, and up-to-date.

Monitoring

Monitor the outcomes of Automated Decision Systems on an ongoing basis to safeguard against unintentional outcomes and to ensure compliance with institutional and program legislation, as well as this Directive.

Training

Documentation on the design and functionality of the system.

Contingency Planning

None

Approval for the system to operate

None

[Link to the Directive on Automated Decision-Making Impact Level Requirements](#)

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Section 3: Questions and Answers

Section 3.1: Impact Questions and Answers

Is the project within an area of intense public scrutiny (e.g. because of privacy concerns) and/or frequent litigation?

Yes

[Points: +3]

Are clients in this line of business particularly vulnerable?

No

[Points: +0]

Are stakes of the decisions very high?

No

[Points: +0]

Will this project have major impacts on staff, either in terms of their numbers or their roles?

No

[Points: +0]

Will you require new policy authority for this project?

Yes

[Points: +2]

The algorithm used will be a (trade) secret

Yes [Points: +3]

The algorithmic process will be difficult to interpret or to explain
Yes [Points: +3]

Does the decision pertain to any of the categories below (check all that apply):
Other (please specify) [Points: +1]

Please describe

Openness and transparency

Will the system only be used to assist a decision-maker?
Yes [Points: +1]

Will the system be replacing a decision that would otherwise be made by a human?
Yes [Points: +3]

Will the system be replacing human decisions that require judgement or discretion?
No [Points: +0]

Is the system used by a different part of the organization than the ones who developed it?
Yes [Points: +4]

Are the impacts resulting from the decision reversible?
Reversible [Points: +1]

How long will impacts from the decision last?
Impacts are most likely to be brief [Points: +1]

Please describe why the impacts resulting from the decision are as per selected option above.

a misdirected request would immediately be redirected to the appropriate GoC institution

The impacts that the decision will have on the rights or freedoms of individuals will likely be:
Little to no impact [Points: +1]

Please describe why the impacts resulting from the decision are (as per selected option above).

does not prevent requester from exercising their right to information

The impacts that the decision will have on the health and well-being of individuals will likely be:
Little to no impact [Points: +1]

Please describe why the impacts resulting from the decision are (as per selected option above)

n/a

The impacts that the decision will have on the economic interests of individuals will likely be:
Little to no impact [Points: +1]

Please describe why the impacts resulting from the decision are (as per selected option above)

n/a

The impacts that the decision will have on the ongoing sustainability of an environmental ecosystem, will likely be:

Little to no impact

[Points: +1]

Please describe why the impacts resulting from the decision are (as per selected option above)

n/a

Will the Automated Decision System use personal information as input data?

No

[Points: +0]

What is the highest security classification of the input data used by the system? (Select one)

None

[Points: +0]

Who controls the data?

Federal government

[Points: +1]

Will the system use data from multiple different sources?

Yes

[Points: +4]

Will the system require input data from an Internet- or telephony-connected device? (e.g. Internet of Things, sensor)

No

[Points: +0]

Will the system interface with other IT systems?

Yes

[Points: +4]

Who collected the data used for training the system?

Your institution

[Points: +1]

Who collected the input data used by the system?

Your institution

[Points: +1]

Will the system require the analysis of unstructured data to render a recommendation or a decision?

Yes

[Points: 0]

What types of unstructured data? (Check all that apply)

Audio and text files

[Points: +2]

Section 3.2: Mitigation Questions and Answers

Internal Stakeholders (Strategic policy and planning, Data Governance, Program Policy, etc.)

Yes

[Points: +1]

Which Internal Stakeholders have you engaged?

Communications

Client Experience / Client Relationship Management

Access To Information Policy

Legal Services

Program Policy
Data Governance
Strategic Policy and Planning
Other (describe)
Please describe

Cyber security, a different department (Canada School of Public Service)

External Stakeholders (Civil Society, Academia, Industry, etc.)
Yes [Points: +1]

Which External Stakeholders have you engaged?

Industry
Civil Society
Other (describe)
Please describe

Media technology briefings

Do you have documented processes in place to test datasets against biases and other unexpected outcomes? This could include experience in applying frameworks, methods, guidelines or other assessment tools.
Yes [Points: +2]

Is this information publicly available?
No [Points: +0]

Have you developed a process to document how data quality issues were resolved during the design process?
Yes [Points: +1]

Is this information publicly available?
No [Points: +0]

Have you undertaken a Gender Based Analysis Plus of the data?
Yes [Points: +1]

Is this information publicly available?
No [Points: +0]

Have you assigned accountability in your institution for the design, development, maintenance, and improvement of the system?
Yes [Points: +2]

Do you have a documented process to manage the risk that outdated or unreliable data is used to make an automated decision?
Yes [Points: +2]

Is this information publicly available?
No [Points: +0]

Is the data used for this system posted on the Open Government Portal?

- Yes [Points: +2]
- Does the audit trail identify the authority or delegated authority identified in legislation?
No [Points: +0]
- Does the system provide an audit trail that records all the recommendations or decisions made by the system?
Yes [Points: +2]
- Are all key decision points identifiable in the audit trail?
Yes [Points: +2]
- Are all key decision points within the automated system's logic linked to the relevant legislation, policy or procedures?
No [Points: +0]
- Do you maintain a current and up to date log detailing all of the changes made to the model and the system?
Yes [Points: +2]
- Does the system's audit trail indicate all of the decision points made by the system?
Yes [Points: +1]
- Can the audit trail generated by the system be used to help generate a notification of the decision (including a statement of reasons or other notifications) where required?
Yes [Points: +1]
- Does the audit trail identify precisely which version of the system was used for each decision it supports?
Yes [Points: +2]
- Does the audit trail show who an authorized decision-maker is?
No [Points: +0]
- Is the system able to produce reasons for its decisions or recommendations when required?
Yes [Points: +2]
- Is there a process in place to grant, monitor, and revoke access permission to the system?
Yes [Points: +1]
- Is there a mechanism to capture feedback by users of the system?
Yes [Points: +1]
- Is there a recourse process established for clients that wish to challenge the decision?
Yes [Points: +2]
- Does the system enable human override of system decisions?
Yes [Points: +2]
- Is there a process in place to log the instances when overrides were performed?
Yes [Points: +1]

Does the system's audit trail include change control processes to record modifications to the system's operation or performance?

Yes

[Points: +2]

Have you prepared a concept case to the Government of Canada Enterprise Architecture Review Board?

Yes

[Points: +1]

Have you completed a Privacy Impact Assessment or revised an existing one?

Yes

[Points: +1]

Does your system reflect Privacy by Design principles?

Yes

[Points: +1]