The AI Of The Possible: Developing Scotland's Artificial Intelligence (AI) Strategy

Question 1: What do you think of the proposed definition of AI for the purposes of the strategy?

The definition does not mention a collaborative human/ AI relationship, as is more common in some applications of AI. The definition is also perhaps too focussed on specific examples rather than referring to broader principles. For example, most of the actuarial applications of AI relate to a form of 'decision-making'.

There is also a risk of framing the definition in terms of the AI challenges of today; in a few years' time these challenges may no longer be thought of as AI. When people talk about search engines nowadays, they do not really think of them as AI, whereas they might have done so in the not too distant past. AI is a fast evolving area.

Question 2: Do you agree that the strategy should be people-centred and aligned with Scotland's National Performance Framework?

We agree with the sentiment of the question, although it may prove challenging to create an 'AI ecosystem' which addresses each of the National Outcomes.

Question 3: How do you think AI could benefit Scotland's people, and how do we ensure that the benefits are shared and no-one is left behind?

There is a risk of over-reliance of AI leading to existing bias/ inequalities being replicated or even exacerbated. Oversight of AI outcomes, strong governance and a robust ethical framework would be of great benefit in addressing these risks. This includes oversight of human intervention in AI, which might introduce bias.

Question 4: What do you think of the proposed overarching vision of the strategy, and the two strategic goals that are proposed to underpin this?

We agree with the goals in principle.

Question 5: Do you agree with the representation of Scotland's AI ecosystem outlined in the scoping document? Is it missing anything?

The AI ecosystem represented appears comprehensive. We note that it including enablers (resources and governance) and suppliers/ buyers (AI developers and AI adopters). We agree with the basis of the of the AI ecosystem; that it should be trusted, responsible and ethical. We believe that responsible and ethical use of AI will foster trust in, and hence greater adoption of, AI.

The governance aspect could be expanded to remediate the current prevalence of AI systems which could be seen as under-regulated.

Question 6: Do you have any comments on the strategic themes that will be explored in detail?

Although the high level themes outlined seem relevant, it may also be necessary to react to any issues arising from questions of governance and resource at the level of individual problems, as well as relying on principles-based approaches.

Question 7: How can confidence in AI as a trusted, responsible and ethical tool be built?

The IFoA developed a Guide for Ethical Data Science in conjunction with the Royal Statistical Society (RSS). We believe this guide can also be applied to an AI context:

https://www.actuaries.org.uk/system/files/field/document/An%20Ethical%20Charter%20for%20Date%20Science%20WEB%20FINAL.PDF

The guide includes five themes for consideration:

- seek to enhance the value of Data Science (AI) for society;
- avoid harm;
- apply and maintain professional competence;
- seek to purse and increase trustworthiness;
- maintain accountability and oversight.

We note that there several areas of overlap between the guide and the AI Strategy Scoping Document, such as the importance of public engagement and governance. Confidence in the use of AI can also be built through transparency and engagement with users/ potential users of AI.

Question 8: Please comment on any other aspect of AI that you feel it is important for Scotland's AI Strategy to address.

Given points raised above on the need to enhance the value of AI for society, and to avoid harm, we believe it is important that AI protects vulnerable consumers from algorithmic bias. For example, where AI is used in insurance pricing, it is important that it does not lead to particular sectors in society effectively being excluded from insurance, through the use of biased insurance risk factors (with an adverse impact on the cost of insurance).

We also consider that the use of AI should not be restricted to where it would be cost-prohibitive to use human intelligence.