

Algorithmic Impact Assessment Results

Version: 0.9.1

Project Details

1. Name of Respondent

Jose Ribas Fernandes

2. Job Title

Technical Specialist, Open Government

3. Department

National Energy Board

4. Branch

Data and Information Management

5. Project Title

BERDI

6. Project ID from IT Plan

DAIM.003

7. Departmental Program (from Department Results Framework)

Internal Services > Data and Information Management

8. Project Phase

Implementation

[Points: 0]

9. Please provide a project description:

The purpose of the project is to provide broader access to the environmental and socio-economic assessments (ESA), making information structured and searchable in a user-friendly manner to increase the public's ability to find these data.

Business Driver / Positive Impact

10. What is motivating your team to introduce automation into this decision-making process?

(Check all that apply)

Use innovative approaches

The system is performing tasks that humans could not accomplish in a reasonable period of time

About The System

11. 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

Risk assessment: Analyzing very large data sets to identify patterns and recommend courses of action and in some cases trigger specific actions

Section 1: Impact Level : 1

Current Score: 12

Raw Impact Score: 12

Mitigation Score: 16

Section 2: Requirements Specific to Impact Level 1 Peer Review

None

Notice

None

Human-in-the-loop for decisions

Decisions may be rendered without direct human involvement.

Explanation Requirement

In addition to any applicable legal requirement, ensuring that a meaningful explanation is provided for common decision results. This can include providing the explanation via a Frequently Asked Questions section on a website.

Training

None

Contingency Planning

None

Approval for the system to operate

None

Other Requirements

The Directive on Automated Decision-Making also includes other requirements that must be met for all impact levels.

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

Contact your institution's ATIP office to discuss the requirement for a Privacy Impact Assessment as per the Directive on Privacy Impact Assessment.

Section 3: Questions and Answers

Section 3.1: Impact Questions and Answers

Risk Profile

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

No [Points: +0]

2. Are clients in this line of business particularly vulnerable?

No [Points: +0]

3. Are stakes of the decisions very high?

No [Points: +0]

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

No [Points: +0]

Project Authority

5. Will you require new policy authority for this project?

No [Points: +0]

About the Algorithm

6. The algorithm used will be a (trade) secret

No [Points: +0]

7. The algorithmic process will be difficult to interpret or to explain

No [Points: +0]

About the Decision

8. Does the decision pertain to any of the categories below (check all that apply):

Other (please specify) [Points: +1]

9. Please describe

This algorithm makes a reversible decision on data access to sensitive Indigenous Knowledge, published in public environmental and socio-economic assessments in the context of project reviews the National Energy Board and Canada Energy Regulator Act.

Impact Assessment

10. Will the system only be used to assist a decision-maker?

No [Points: +0]

11. Will the system be replacing a decision that would otherwise be made by a human?

No [Points: +0]

12. Will the system be replacing human decisions that require judgement or discretion?

No [Points: +0]

13. Is the system used by a different part of the organization than the ones who developed it?

No [Points: +0]

14. Are the impacts resulting from the decision reversible?

Reversible [Points: +1]

15. How long will impacts from the decision last?

Impacts are most likely to be brief [Points: +1]

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

The system will make an automated decision on inclusion or exclusion of a data set from an open data portal (BERDI), given its probability of being sensitive Indigenous Knowledge. The decision is reversible, and relevant parties (Nations, communities) can contact the project working group to add or remove data from the portal. Impact is likely to be brief because data is already public on the public legal repository, but difficult to access.

17. The impacts that the decision will have on the rights or freedoms of individuals will likely be:

Little to no impact [Points: +1]

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

Impact is likely to be null to small, because data is already public on the public legal repository, but difficult to access.

19. The impacts that the decision will have on the health and well-being of individuals will likely be:

Little to no impact [Points: +1]

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

We don't anticipate impacts on health and well-being.

21. The impacts that the decision will have on the economic interests of individuals will likely be:

Little to no impact [Points: +1]

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

We don't anticipate impacts on economic interests of individuals or communities.

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

Little to no impact [Points: +1]

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

We don't anticipate impacts on sustainability of an environmental ecosystem.

About the Data - A. Data Source

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

- No [Points: +0]
26. What is the highest security classification of the input data used by the system? (Select one)
None [Points: +0]
27. Who controls the data?
Federal government [Points: +1]
28. Will the system use data from multiple different sources?
No [Points: +0]
29. Will the system require input data from an Internet- or telephony-connected device? (e.g. Internet of Things, sensor)
No [Points: +0]
30. Will the system interface with other IT systems?
No [Points: +0]
31. Who collected the data used for training the system?
Your institution [Points: +1]
32. Who collected the input data used by the system?
Your institution [Points: +1]

About the Data - B. Type of Data

33. Will the system require the analysis of unstructured data to render a recommendation or a decision?
Yes [Points: 0]
34. What types of unstructured data? (Check all that apply)
Audio and text files [Points: +2]

Section 3.2: Mitigation Questions and Answers Consultations

1. Internal Stakeholders (Strategic policy and planning, Data Governance, Program Policy, etc.)
Yes [Points: +1]
2. Which Internal Stakeholders have you engaged?
Legal Services
Access to Information and Privacy Office
Client Experience / Client Relationship Management
Data Governance
Program Policy
Strategic Policy and Planning
Communications
3. External Stakeholders (Civil Society, Academia, Industry, etc.)
Yes [Points: +1]
4. Which External Stakeholders have you engaged?

De-Risking and Mitigation Measures - Data Quality

5. 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]

6. Is this information publicly available?

No [Points: +0]

7. Have you developed a process to document how data quality issues were resolved during the design process?

Yes [Points: +1]

8. Is this information publicly available?

No [Points: +0]

9. Have you undertaken a Gender Based Analysis Plus of the data?

No [Points: +0]

10. Is this information publicly available?

No [Points: +0]

11. Have you assigned accountability in your institution for the design, development, maintenance, and improvement of the system?

Yes [Points: +2]

12. Do you have a documented process to manage the risk that outdated or unreliable data is used to make an automated decision?

No [Points: +0]

13. Is this information publicly available?

No [Points: +0]

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

No [Points: +0]

De-Risking and Mitigation Measures - Procedural Fairness

15. Does the audit trail identify the authority or delegated authority identified in legislation?

No [Points: +0]

16. Does the system provide an audit trail that records all the recommendations or decisions made by the system?

No [Points: +0]

17. Are all key decision points identifiable in the audit trail?

No [Points: +0]

18. Are all key decision points within the automated system's logic linked to the relevant legislation, policy or procedures?

No [Points: +0]

19. Do you maintain a current and up to date log detailing all of the changes made to the model and the system?

No [Points: +0]

20. Does the system's audit trail indicate all of the decision points made by the system?

No [Points: +0]

21. 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?

No [Points: +0]

22. Does the audit trail identify precisely which version of the system was used for each decision it supports?

No [Points: +0]

23. Does the audit trail show who an authorized decision-maker is?

No [Points: +0]

24. Is the system able to produce reasons for its decisions or recommendations when required?

No [Points: +0]

25. Is there a process in place to grant, monitor, and revoke access permission to the system?

Yes [Points: +1]

26. Is there a mechanism to capture feedback by users of the system?

Yes [Points: +1]

27. Is there a recourse process established for clients that wish to challenge the decision?

Yes [Points: +2]

28. Does the system enable human override of system decisions?

Yes [Points: +2]

29. Is there a process in place to log the instances when overrides were performed?

No [Points: +0]

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

No [Points: +0]

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

No [Points: +0]

De-Risking and Mitigation Measures - Privacy

32. If your system involves the use of personal information, have you undertaken a Privacy

Impact Assessment, or updated an existing one?

Yes

[Points: +1]

33. Have you designed and built security and privacy into your systems from the concept stage of the project?

Yes

[Points: +1]

34. Is the information used within a closed system (i.e. no connections to the Internet, Intranet or any other system)?

Yes

[Points: +1]