



Consultation on the White Paper on Artificial Intelligence - A European Approach

14 June 2020

While we unhesitatingly support this important work, we have two specific concerns that we hope will be addressed.

1. The Consultation and the seven key requirements identified in the Guidelines of the High-Level Expert Group refer only to general AI concerns. However, **it is also essential to account for domain specific concerns**, which differ according to the domain in which the AI is being applied (i.e., there is a 'collision' between the ethics of AI and the ethics of the domain). For example, when AI is applied in education, the developers, researchers, policymakers etc. must account for the ethics of education (e.g., choice of pedagogy) as well as the more general ethics of AI (e.g., privacy). In health, in transport, in fintech, etc., the questions are quite different. This, in our opinion, is a serious omission of the Guidelines of the High-Level Expert Group and should be implemented as an eighth key requirement, along the lines of: "Account for the ethics of the domain in which the AI is being applied."
2. The Consultation appears to assume that AI is always entirely data-based. However, this ignores the history of AI (i.e., symbolic AI and knowledge-based systems), the many limitations of data-based AI (i.e., in many applications it simply is not more accurate than humans), and the growing likelihood that AI development is reaching a plateau which only a new paradigm will solve, one that builds on but goes far beyond the use of data. In short, **focusing on data is necessary but far from sufficient**.

Dr Wayne Holmes
MA, MSc (Oxon), PhD (Oxon)
Principal Researcher (Education) at [Nesta](https://www.nesta.org.uk)

Artificial Intelligence in Education. Promise and Implications for Teaching and Learning
(Holmes, Bialik and Fadel, 2019)

58 Victoria Embankment, London EC4Y 0DS +44(0)20 7438 2500 [nesta.org.uk](https://www.nesta.org.uk)

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