



Chartered Institution of Highways and Transportation

**Consultation response from
The Chartered Institution of Highways
and Transportation**

**AI regulation: a pro-innovation
approach**

**Department for Science, Innovation and Technology
& Office for Artificial Intelligence**

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For any inquiries, please email technical@ciht.org.uk

Key messages from CIHT:

- There needs to be a greater consideration of the role data plays in supporting AI technologies, and this should be reflected in the cross-sectoral AI principles.
- Local authorities and national bodies will be key to rolling out AI in public services such as transport, and so should be given appropriate funding, guidance, and procurement frameworks to do this successfully.
- A clear evidence-based approach to policy developments is critical, particularly when it comes to public understanding around the adoption of new and emerging technologies within the transport sector. Regulators and organisations such as CIHT should work together to ensure that unbiased evidence on the pros and cons of AI is well communicated and shared widely. Working across the sector to inform and educate people will build a healthy relationship between users and AI.

The revised cross-sectoral AI principles

Existing regulators will be expected to implement the framework underpinned by 5 values-focused cross-sectoral principles:

- *Safety, security and robustness*
- *Appropriate transparency and explainability*
- *Fairness*
- *Accountability and governance*
- *Contestability and redress*

6. What, if anything, is missing from the revised principles?

CIHT believes that these principles are lacking in their consideration of the importance of data and how it is collected. AI technology can only be as good as the data it is relying on, as this is all the AI system knows about the world. Therefore, without complete and comprehensive data sets none of the current cross-sectoral AI principles can be met.

The public sector has a valuable role to play in providing AI systems with the data they need to operate. However, current data collection practices differ between local authorities and other public bodies, meaning data *may* not be sufficiently accessible, robust, reliable, comprehensive, timely, granular, or insightful.

The need for complete, comprehensive, consistent and accurate data sets has already been realised by the Government in their [National Data Strategy](#). However, CIHT believes that the opportunities and strategies presented in this policy paper have not been integrated within the current AI regulation framework.

Building on the National Data Strategy, an appropriate, additional, cross-sectoral principle that reflects this could be:

Data foundations and availability

It is anticipated that regulators will need to:

Ensure that the data feeding AI systems is:

- a. fit for purpose, recorded in standardised formats on modern, secure, future-proof systems.
- b. held in a condition that means it is findable, accessible, interoperable, and reusable, and accords with open data standards where possible.

New central functions to support the framework

- *Monitoring, assessment and feedback*
- *Support coherent implementation of the principles*
- *Cross-sectoral risk assessment*
- *Support for innovators*
- *Education and awareness*
- *Horizon scanning*
- *Ensure interoperability with international regulatory frameworks*

13. Are there additional activities that would help individuals and consumers confidently use AI technologies?

When it comes to the transport sector, local authorities and national bodies are key to delivering, managing, and maintaining much of our infrastructure that enables the movement of people and goods. Because of this, it will be vital that any national advancements in technologies such as AI, ensure that the capabilities of local authorities are not left behind.

Local authorities are currently facing significant fiscal constraints: inflation and spiralling energy costs have impacted budgets considerably against remaining pressures to ensure the delivery of statutory services. Thus, many may not have the financial or staffing resources to invest in the technology necessary to enable AI use within their organisations. Local authorities will therefore need specific funding to invest in AI technologies, guidance to support the delivery of AI, and procurement advice to contract these technologies effectively.

CIHT members, when surveyed, ¹ chose '*building an industry culture of positivity towards AI*' as the most effective way of attracting and developing the best people to build and use AI within the transport industry.

¹ CIHT survey was conducted during a webinar on 19 April 2023 then online via SurveyMonkey between 19 April and 25 April 2023

In that survey, 60% of CIHT members also stated that they currently did not trust AI technology.

Scepticism towards new technologies is not new within the transport sector, as we have seen recently with smart motorway projects ² and autonomous vehicles. ³ In both these examples, the primary concerns of the general public often focused on the reliability and safety of these new technologies. It is likely that any future AI technology that involves controlling or operating moving vehicles will likely receive the same concerns, and so a clear evidence-based approach to developing and regulating AI in this sector will be critical.

It is important that the factual evidence of the safety and reliability of AI is not misrepresented in the media or by those who promote such technologies. Public trust towards AI should be built up by being honest about its failures and how to avoid them whilst promoting its benefits and how they can be harnessed in all sectors.

13.1. If so, should these activities be delivered by government, regulators or a different organisation?

AI funding and procurement frameworks need to be provided by the government to support local authorities. After consulting with appropriate regulators and sector specific organisations (that support local authorities), AI guidance should be provided by the government.

Regulators must share unbiased information with leading organisations in the sector on the monitoring, evaluation, and risk assessment of AI. These organisations should then disseminate and share this information with their members/ affiliates etc., to create an open and honest understanding of developments with AI.

Regulators and organisations, such as CIHT, keen to enable the positive benefits from AI have a responsibility to create the right supporting culture for this to happen.

² [UK Government scraps all new Smart Motorways](#) April 2023

³ [Are autonomous vehicles unsafe or are us humans to blame? \(ciht.org.uk\)](#) September 2022