# Statistics Canada's Framework for Responsible ML

### Saeid Molladavoudi, Senior Data Science Advisor

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# Outline

- 1. Context Why do we need a framework?
- 2. Statistics Canada's framework
- 3. Implementation Peer-review processes
- 4. Current and forward looking initiatives
- 5. Research and Innovation
- 6. Conclusion



# Context

- The use of artificial intelligence and machine learning (ML) methods is continuously increasing inside and outside of Statistics Canada
  - Automate manual tasks (cognitive automation)
  - Develop new products, provide new insights and analysis
  - Use of large amount of data and unstructured data
- Canadians expect Statistics Canada
  - To demonstrate **trustworthiness**
  - Produce <u>quality</u> statistics (<u>Statistics Canada Quality Framework</u>)
  - Preserve confidentiality
  - To use means proportionate to the needs (Necessity and proportionality framework)
  - Ensure transparency





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# **Context: Why is Responsible ML required?**

- With the use of these complex methods come many questions
  - What is the **impact** of a decision made by ML methods on humans?
  - Is this data used <u>appropriate</u> for our needs?
  - How can we evaluate the **<u>quality</u>** of the results?
- ML models have many sensitive applications
  - Diagnostic of a particular disease or health condition
  - Attribution of visas to foreigner workers
- ...therefore ML models need to be built in a <u>responsible</u> and <u>transparent</u> way







# **Context: Why is Responsible ML required in government?**

- <u>Reproducible</u> and <u>transparent</u> modelling is also essential when ML models are used to make <u>administrative decisions or generate insights</u> about individuals and society
- Government of Canada's response:
  - Treasury Board Directive on Automated Decision-Making and Algorithmic Impact Assessment (AIA)



#### **Directive on Automated Decision-Making**

The Government of Canada is increasingly looking to utilize artificial intelligence to make, or assist in making, administrative decisions to improve service delivery. The Government is committed to doing so in a manner that is compatible with core administrative law principles such as transparency, accountability, legality, and procedural fairness. Understanding that this technology is changing rapidly, this Directive will continue to evolve to ensure that it remains relevant. Date modified: 2021-04-01



# **Context: Why is Responsible ML required in Statistics Canada?**

• The responsible ML framework is intimately connected with producing quality statistics and supports the core mission of Statistics Canada:

"The role of Statistics Canada is to **provide credible and relevant statistical information** to the public, to inform decision-making and to help Canadians better understand their country. The trust of the Canadian people is earned and maintained through **transparent and responsible** management of statistical information and of the statistical system that produces it"- **Anil Arora, Chief Statistician, The Quality Assurance Framework, 2017** 

https://www150.statcan.gc.ca/n1/pub/12-586-x/2017001/article/s1-eng.htm





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# **Context: Governance for ML at Statistics Canada**

- Statistics Canada is about to release its Data Science Strategy based on six pillars
- Operationalization pillar
  - To develop products that are <u>ethical</u>, <u>safe</u> and in accordance with Statistics Canada's <u>confidentiality</u> and <u>security</u> rules.
  - While producing results <u>faster</u> and more efficiently, they are continuously subject to <u>quality, ethics, sound</u> <u>methods and algorithmic</u> <u>accountability.</u>



• Leading to the use of the Framework for responsible machine learning processes



# Framework for Responsible Machine Learning Processes at Statistics Canada



Assessed through self-evaluation and peer review, using a checklist and producing a report or dashboard





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# **Respect for People**

Value to Canadians	Prevention of Harms	Fairness	Accountability
<ul> <li>Does the application bring any benefits to users?</li> <li>How did you show that quality required by the user will be achieved by the ML algorithm used?</li> </ul>	<ul> <li>Could the results of the machine learning product</li> <li>Suggest discrimination?</li> <li>Inadvertently reveal information about vulnerable populations?</li> </ul>	<ul> <li>Are all the variables used in the model relevant?</li> <li>Do you protect integrity and confidentiality of the data?</li> <li>Is there a strategy in place to avoid personal biases?</li> </ul>	<ul> <li>Who is responsible?</li> <li>Is there human oversight?</li> <li>What is the plan for monitoring and maintenance of performance of the application?</li> </ul>



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# **Respect for Data**

Privacy	Security	Confidentiality
Is it compliant with the Directive on Conducting Privacy Impact Assessments?	Is it compliant with the Directive on the Security of Sensitive Statistical Information?	Is it compliant with the <i>Policy</i> on Privacy and Confidentiality?





# **Sound Application**

#### Transparency

Explain why the algorithm and the learning data are appropriate

- Provide descriptions of the learning data, algorithm, model diagnostics and code
- Share the code if possible

Were all partners, namely subject matter experts, methodologists, data scientists and computer scientists, involved in the development of the model?

#### **Reproducibility of Process and Results**

- Is the code version-controlled, e.g. via GitHub or GitLab?
- Are the outputs bundled with the code and data?
- Can the process be executed from a simple master script?
- Is the pipeline fully documented?



# **Sound Methods**

#### Quality of Learning Data

- Do you have sufficient labelled data?
- How was the quality assessed?
- Is it a good representation of the target population?
- Is there a process to detect data drift?

#### Valid Inference

- Why is your validation protocol appropriate?
- What are the evaluation metrics?
- Is there a quality assurance methodology in place to track the performance of the model?

#### **Rigorous Modelling**

- How does the model perform on neverseen-before data?
- What is the assessment of the generalization error?
  - Overfitting
  - Underfitting

#### Explainability

- Can you explain the relationship between the input and the output of a model?
- Do you use any tool or methods to aid the interpretation of the model?



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# Implementation

# **Peer-Review Processes**





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## **Implementation – Review Process**

- The Framework for responsible ML processes at Statistics Canada is enforced through an independent review process of projects for internal and external clients (other federal departments)
- We peer-review proof-of-concept ML projects before they transition to production/deployment.
- Several projects have been evaluated using this review process. Here are a few from last year:
  - Crop Yield Prediction (using satellite data and other)
  - Building Type Classification from Street-view Imagery using Convolutional Neural Networks
  - Census comments classification
  - Receipts auto-Capture (Information Extraction and Optical Character Recognition)
  - (scanned) PDF Information Extraction (financial statements)
  - Client Inquiry Text Classification (classification and automated rerouting of requests/emails)

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# High level steps from Inception to Production (evolving process)



# **Implementation – The checklist**

The framework for responsible ML processes at StatCan is enforced through an **independent** review process. The process consists of a self-evaluation using a checklist, a peer-review and a presentation to the Modern Statistical Methods and Data Science (MSMDS) branch Scientific review committee.

- The Checklist
  - The checklist consists of a list of questions whose honest answers will indicate whether or to what extent the guidelines have been followed.
  - It translates each framework guideline into specific questions
  - To be completed by the project manager/team
  - Could trigger the completion of the Algorithmic Impact Assessment tool
  - Once completed, the list is sent back to the review team





# Implementation – The checklist (Cont'd)

- Translates each framework guideline into specific questions.
- Could trigger the completion of the Algorithmic Impact Assessment tool

Sound Application - Reproducibility of Process and Results							
Guideline No.	Checklist questions	Yes	No	Write-in	Self-assessment filled by	Peer review conducted by	Peer review comments
18	Is the code version controlled with a corporately supported system (such as GitLab, GitHub)?	0	0				
19	Is the set of modeling results bound with the code, input data and system and session information?	0	0				
20	Is the pipeline fully executable by all stakeholders from a "master" script?	0	0				



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# **Implementation - Review Process & Committees**

#### • Peer review Process

- **Designated reviewers** review the completed checklist and relevant documentation provided by the project manager/lead (methodological report, access to code, etc.).
- Data Science Division Experts in statistics and data science
  - Review themes Sound Application and Sound Methods
- Data Ethics Secretariat Experts in data ethics
  - Review themes Respect for People and Respect for Data
  - Depending on the project, the **Internal or External Ethics Committee** may be called to review the project
- The appointed reviewers then produce a **report** to the project manager/lead possibly listing major and/or minor recommendations
- (Possible) Presentation to the MSMDS Scientific Review Committee
  - Review themes Sound Application and Sound Methods
  - Provide recommendations and guidance







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# **Recent and forward looking initiatives**

- Raise awareness within and outside Statistics Canada
  - Presented at the Advisory Council on Ethics and Modernization of Microdata Access meeting (June 2021)
  - Article in the Data Science Network newsletter (July 2021)
  - Presented at the 2021 International Methodology Symposium (October 2021)
    - Quality Considerations in the Production of Statistics
    - Ethics and Privacy workshop
  - Presented at the 2021 CANSSI Showcase (Nov. 2021) Workshop: Innovations in Data Analytics and Data Science: What's New at Statistics Canada?
  - Presentation at the <u>event</u> organized by the Data Science Interdisciplinary Research Cluster at the University of Toronto's Dalla Lana School of Public Health (April 2022).
- **Develop a workshop/training** to promote responsible AI practices (three-module course)
- **Continue to review** ML processes moving to production using the framework
- Conduct research in the areas related to responsible ML, including applications of explainable AI





# **Recent and forward looking initiatives (Cont'd)**

- Ever-green approach to the framework and the review process
  - Publish the checklist
  - Review the framework on a yearly basis to remain relevant
  - Continue to provide tools/support to make it easier to follow the checklist
- **Outreach and collaboration** with other federal departments and leading private sector and not-for-profit organizations
  - Microsoft (best practices for responsible AI)
  - ForHumanity (Independent Audit of AI Systems oversight)
- We're open to other collaborations







# **Research and Innovation**

We conduct research in the areas of responsible and ethical AI/ML

- Research projects on Explainable AI (XAI)
  - Study algorithms that help explain AI models
    - Apply methods on relevant projects
    - Identify practical recommendations on method(s) to use
  - Cynthia Rudin's work on interpretability and the use of simpler models for interpretable AI
    - Review of her work in view of practical recommendations for choice of models
- Research project on Automated Machine Learning (AutoML)
  - Review available tools to create guardrails and recommendations for their use
  - Identify opportunities, weaknesses, limitations, risks, ...
- Upcoming Research Projects on Fair ML, Adversarial scenarios, Confidentiality and model privacy, Causal ML and counterfactual analysis and others.





# Conclusion

#### • Needs/Requirements

- Use AI and ML methods responsibly
- Maintaining the trust of Canadians
- Produce good quality statistics
- Statistics Canada's Response
  - Framework and review process
- The framework promotes responsible development by flagging potential design vulnerabilities
- The framework also gives developers and reviewers a benchmark for responsible collaboration









For more information,

please contact my team:

Loic Muhirwa Loic.muhirwa@statcan.gc.ca

Mohammed Haddou Mohammed.Haddou@statcan.gc.ca

Étienne Rassart Etienne.Rassart@statcan.gc.ca

Saeid Molladavoudi Saeid.Molladavoudi@statcan.gc.ca

The content of this presentation represents the position of the authors and may not necessarily represent that of Statistics Canada.

Pour plus d'information, veuillez contacter mon equipe:

Loic Muhirwa Loic.muhirwa@statcan.gc.ca

Mohammed Haddou Mohammed.Haddou@statcan.gc.ca

Étienne Rassart Etienne.Rassart@statcan.gc.ca

Saeid Molladavoudi Saeid.Molladavoudi@statcan.gc.ca

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