# AI Policy Accelerator

# Building EU AI Act Compliance

## October, 2024

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# About ForHumanity

**Public interest**
Founded in 2016
US-based 501(c)(3) non-profit
(with an EU affiliate)

**Vision**
Ryan Carrier, Executive
Director and founder

**Global scope**
2300+ contributors
From 98 countries

**Leadership**
Eight-member Board of Directors
(majority elected by community)

# Mission

To examine and analyze the downside risks associated with the
ubiquitous advance of AI, Algorithmic and Autonomous (AAA) systems
to engage in risk mitigation and ensure the optimal outcome...
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# AI Policy Accelerator Modules

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# Modules

# AI POLICY ACCELERATOR
## EU AI Act

| | | |
|---|---|---|
| GOVERNANCE, OVERSIGHT, ACCOUNTABILITY STRUCTURE | ETHICAL OVERSIGHT | AI LITERACY |
| RISK MANAGEMENT | DATA MANAGEMENT AND GOVERNANCE | HUMAN OVERSIGHT AND INTERACTIONS |
| TRANSPARENCY REQUIREMENTS | MONITORING | QUALITY MANAGEMENT SYSTEM |

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Participants

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1. **Members/Providers** - have two options for contractual involvement:
   a. **Member Agreement** - "**Members**" pay a fee (€5,000) to join the whole accelerator and receive access to all iterations of policy development across all nine modules
   b. **Provider Agreement** - "**Providers**" pay a specific fee (€10,000) for each module that they participate in while bringing a live use case designed to achieve "satisfactory compliance" with the pre-defined and exit-agreed objectives of the module. ***Providers have complete control of public/private information and the manner in which it is placed into the AI Policy Accelerator module. Providers receive all the benefits of **Members**.

1. **Notified Bodies/Audit firms** - Adjudicate compliance for "satisfactory compliance.

2. **Academics and other Volunteers** - Individuals/volunteers who participate in the process, collaborating with **Providers** to deliver all requisite evaluation methods and compliance requirements to the satisfaction of the pre-defined and exit-agreed objectives.

# Entry &
# Exit
# Criteria

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# Entry Criteria

| General Oversight and Accountability | The **Algorithmic Risk Committee** shall maintain and keep current an **AAA Systems List** including: <br> a. **Scope, Nature, Context and Purpose**, <br> b. legal basis, if using **Personal Data** <br> c. Descriptions and presence of **Personal Data**, <br> d. classes of data, <br> e. Source of data and expected number of **AI Subjects** <br> f. If the **AAA System** has been assessed as a "High-Risk AI" <br> g. If Model Validation has been confirmed from Top Management and Oversight Bodies  *[#1102]*  \| | Internal logs, register or database |
|---|---|---|
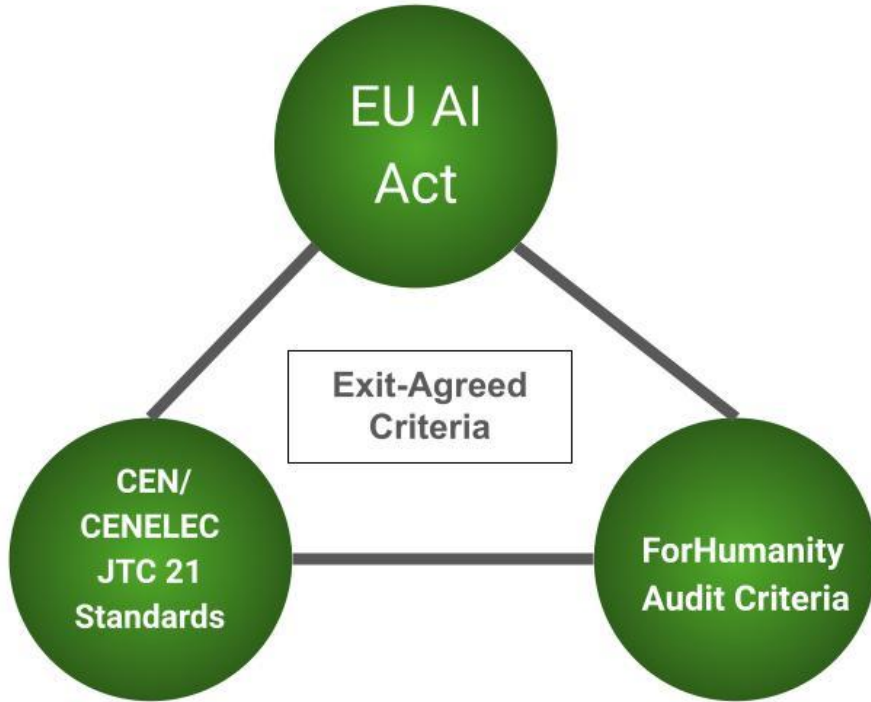
*Regulatory Compliance*

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Our
Infrastructure
of Trust
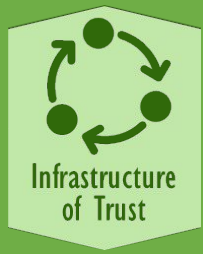
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ForHumanity first wrote about independent audit of AAA Systems in 2017 and it has been our primary focus since then

**Transformation to a process audit ecosystem occurs by accomplishing the following tasks:**

1.  Understanding how financial audit rules & standards mitigate risk, provide clarity, and translate opaque controls and processes into public trust and valuable cross-sectional comparability through third-party independent assurance
2.  Understanding the risks of AAA Systems and developing rules & standards to treat and mitigate risks to stakeholders, including individuals
3.  Drafting audit criteria that are binary, implementable, solution-oriented to the identified risks
4.  Mapping steps #1-3 onto an ecosystem that recreates the assurance and infrastructure of trust nurtured in financial audit for more than 50 years
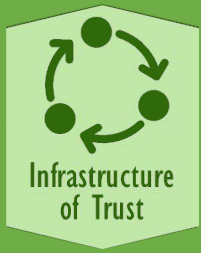
Infrastructure of Trust

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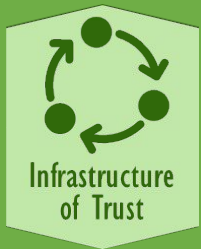
# An Infrastructure of Trust - Taxonomy

| | Internal Audit | 3rd-Party, Independent Audit | Assurance | Assessment | Consulting |
|---|---|---|---|---|---|
| Certified Practitioners Required? | No, Employees | Yes | Yes | No | No |
| Objective/Subjective | Objective | Objective | Objective | Subjective | Subjective |
| Independent | Yes | Yes | Yes | No | No |
| Known 3rd Party transparent Binary, Rules or Laws | Yes | Yes | No | No | No |
| Known 3rd Party transparent non-binary, Standards, Frameworks or Guidelines | No | No | Yes | No | No |
| Service provided for? | Management | Users, Society | Users, Society | Contracting Party | Contracting Party |
| Feedback Loop with the Company, iterative problem solving, teaching, tailoring | No | No | No | Yes | Yes |
| Consequences for False Compliance assertions | job loss | Liability | Liability | No liability | No liability |
| Written Report produced for the Public | No | Yes | Yes | No | No |

Sources: ForHumanity, COSO, IAASB, Sarbanes-Oxley, IFAC

Infrastructure of Trust

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**An Infrastructure of Trust -**

**Core Principles**

**Independence:** Eliminates conflicts of interest

**Transparency:** Crowdsourced and open approach

**Diversity:**

- Diverse inputs (DI)
- Multi-stakeholder feedback (MSF)
- Prevents exclusion
- Maximises inclusion of protected categories
- Diversity of thought and experience

**Jurisdictional focus** and **Global harmonisation**

**Dynamic:** Assures ongoing maintenance and best practices adaptation in a dynamic environment

**Infrastructure of Trust**
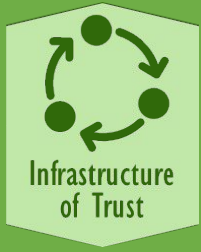
**Our Infrastructure of Trust**

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**Four Core Tenets**

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1. Alignment

2. Expertise

3. Independence

4. Operationalization

# 1. Alignment

ForHumanity produces accessible, binary (compliant / not compliant) certification criteria that transparently and inclusively aligns to local jurisdiction public requirements. (ideally criteria is approved and mandated by governments or regulatory bodies).

Our audit criteria embeds compliance and performance into practice, and is considerate of corporate wisdom, but impervious to corporate dilution and undue influence

Our audit criteria are mindful of the regulatory burden and dedicated to maximising risk mitigations to humans

**Infrastructure of Trust**

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# 2. Expertise

Individuals are trained and accredited on certification criteria as experts.  They are individually held to a high standard of behaviour and professionalism as described in the ForHumanity Code of Ethics and Professional Conduct - they are ForHumanity Certified Auditors (FHCAs).

# 3. Independence

Certification Bodies employ FHCAs to independently assure compliance with certification criteria on behalf of the public. They are licensed, independent, robust organisations that take on the task and risk, on behalf of the public to ascertain assurance of compliance. They are held to standards of independence and anti-collusion and are further subject to third-party oversight ("watching the watchers"), by entities such as national accreditation bodies.
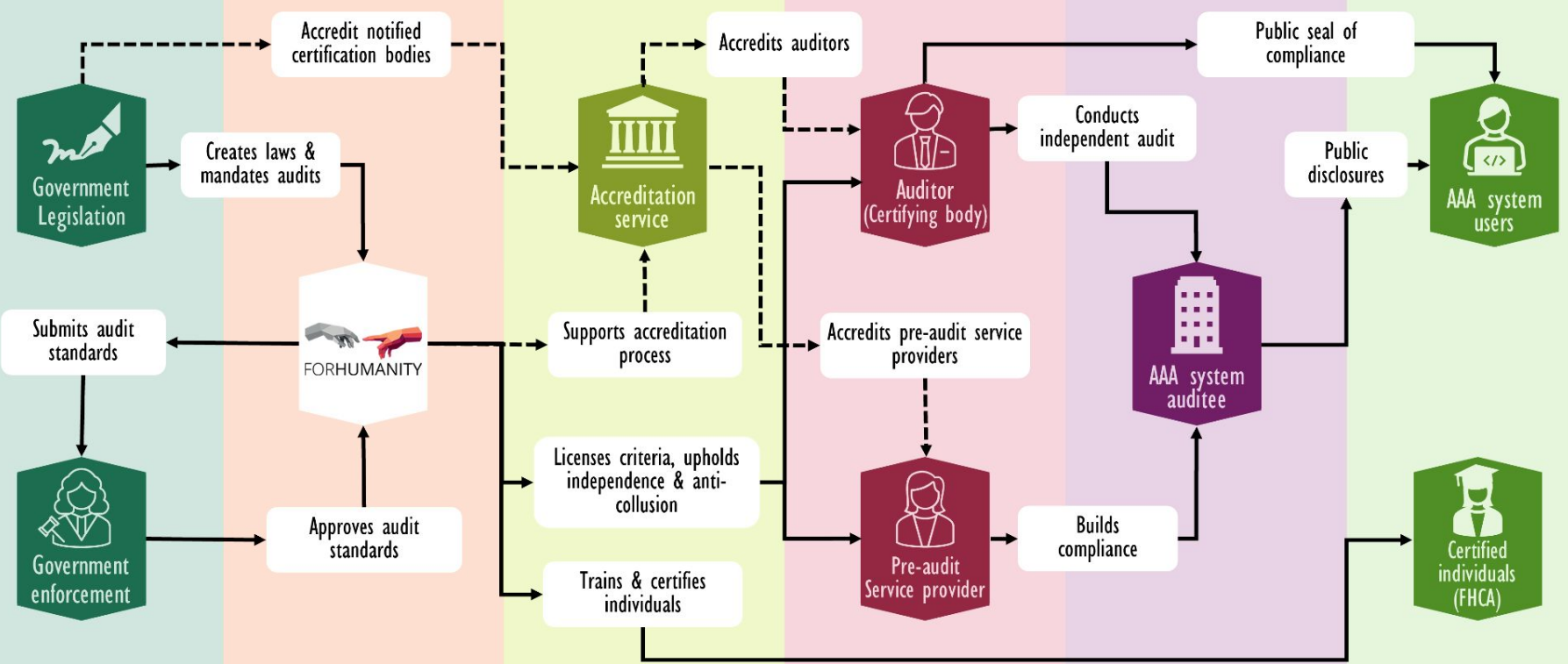
# 4. Operationalization

Corporations use the criteria to operationalise governance, oversight and accountability for their AAA System that helps them to satisfy certification compliance comprehensively. Comprehensive compliance will create leverageable governance, oversight and accountability that will simultaneously lead to more sustainable profitability and reduce the risk of negative outcomes for their stakeholders.

# Responsibilities of Audit Parties



Accredit notified certification bodies

Accredits auditors

Public seal of compliance

Government Legislation

Creates laws & mandates audits

Accreditation service

Auditor (Certifying body)

Conducts independent audit

Public disclosures

AAA system users

Submits audit standards

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Supports accreditation process

Accredits pre-audit service providers

AAA system auditee

Government enforcement

Approves audit standards

Licenses criteria, upholds independence & anti-collusion

Pre-audit Service provider

Builds compliance

Certified individuals (FHCA)

Trains & certifies individuals

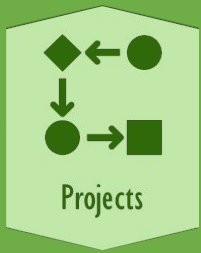| Government | Audit standards body | National authority | Licensed & accredited | Provider, reseller, or deployer | Public |

# Projects and Courses

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**Current
Audit
Criteria
Projects**

**50+ certification schemes with 7,000+ unique criteria**

Privacy (GDPR, CCPA, DPDPA, DIFC, LGPD)

AI governance (EU AI Act):

- AEDT (82 use cases - for Annex III.4.(a).(b))
- Financial Services (Annex III 5.(b))
- Biometrics (Annex III 1)

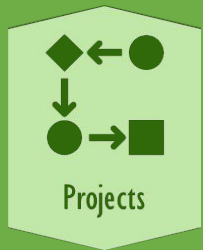Unfair, Deceptive, and Abusive Practices (FTC Act)

Digital services (EU DSA)

Disability inclusion and accessibility (US, EU)

Children's Code and AADC (UK, CA)

Standalone:

- Top Management and Oversight Bodies (Global, EU)
- Ethics committee
- Risk Management (NIST, COSO, ISO, EU AI)
- Cybersecurity (ENISA, NIST, ISO)

Projects

**Courses and Support**

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**ForHumanity AI Education and Training Center**

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| Individuals: audit compliance | Government-wide: mini-courses | Senior officials: direct training |
|---|---|---|

**Individuals: audit compliance**

Nearly 1900 registrations

All online/asynchronous

Current classes:
1. IAAIS Foundations (pre-req for 2-9)
2. Risk Management framework
3. Algorithm ethics
4. GDPR
5. Children's Code
6. NYC AEDT
7. EU AI Act
8. Disability inclusion and accessibility
9. Digital Services Act

**Government-wide: mini-courses**

Designed for government members interfacing with AAA Systems

4-5 hours per annum

Current classes:
1. Ethical choice awareness
2. Nudge and deceptive pattern awareness
3. Automation bias
4. Disability inclusion and accessibility awareness

**Senior officials: direct training**

Government-centric use cases

Certifications available for assurance of compliance

Subcomponents of existing schemes:
1. Risk Management framework
2. Top Management and Oversight Bodies
3. Ethical Oversight