

Artificial Intelligence Risk Assessment (AIRA)

The completed AIRA form will be published along with the connected DPIA for this use case as one document on our Open Data Portal so please avoid jargon, explain acronyms the first usage, and complete all sections to a good standard. An AIRA is necessary when any algorithmic based tool is being used to replace a business process, [you can read further instructions on an Essentials page by clicking this link](#).

AI Lifecycle Stage	Issue	Details	Notes
Overall	What exactly is the AI being used for?	Grammarly's AI checks grammar, spelling, and punctuation errors, enhances clarity, and suggests improvements in tone and style. It helps streamline writing and provides prompts to start tasks.	
Overall	Will it be used for any law enforcement purposes eg around prosecutions the council tasks, or work by the YOS team? If yes, what is the law that explicitly allows AI use for law enforcement?	No	AI cannot be used for law enforcement purposes unless explicitly permitted by law as this is Part 3 Data Protection Act 2018 processing
Overall	Is the AI being used to exercise a power given by law to an individual officer to make a decision?	No	If yes, AI is not able to be used legally. This is where the law says a particular officer has to make a decision.
Overall	What are the laws that underpin this piece of processing, what law allows the council to do the thing the AI will help with/do?	The tool will be used for multiple areas of support in providing the services the council must legally provide. These will be understood at the more granular use case level within the GenAI programme. There is no specific law required for the use of this tool, it would come under the laws that cover data processing for the underlying functions, in the same way that use of email and	Not the laws that allow AI use, but the laws that allow the council to do the actual work that the AI will do/help with

		excel for example do. It has the same data protection legal basis as the underpinning ones for the processing as set out in privacy notices for services and the Information Asset Register.	
Overall	Do we understand how the AI will work? Can we explain it to data subjects (eg in a Privacy Notice or if they ask) so they understand what is being done with their data? Explain it here	Grammarly's products are powered by an advanced data model which at its core has really good writing within it. Grammarly compares the work written by council officers with this work – suggesting ways to improve it for the council officer to select. They would only put in your personal data if it was needed, and it isn't stored after use.	
Planning stage	Necessity. Is it necessary to use AI? Is there a viable alternative that would be less intrusive? How does the council justify the use of AI is proportionate?	The purpose of AI in Grammarly is to support and increase productivity of staff, and improve quality of communication with citizens. Yes staff can undertake large amounts of training to upskill themselves but with an organisation of 6,000 people this is time consuming and resource heavy. In fact previous campaigns for 'Plain English' have cost 100ks for training and did not address the issues of spelling, punctuation and grammar. Grammarly would more effectively address these issues lowering this burden, support staff, increase their productivity and would enable staff with accessibility needs like ADHD, Dyslexia and neurodivergency to be more effective in their role and improve their confidence in written communications. It is important for the council to communicate in an effective and clear manner with residents, particularly as many will not use English as a first language. When delivering services, it is necessary to ensure that communications are well written, not only to be professional but to ensure the messages are delivered in an appropriate and comprehensible way.	Necessary means not that it's the only option, but it is the most sensible effective option. Mere convenience or it's a good idea wouldn't be sufficient.

		It is not unusual for council communications to include common grammatical errors (you're instead of your for example) which detract from the weight of message being delivered and reduce the professional impact of communications.	
Planning stage	Will the AI be using Automated Decision Making? Ie making a decision that has a significant effect on the people it's making decisions about, <i>without any human involvement</i> ? If yes what decisions will it make? What impact will those decisions have on the people they are about? How will the algorithmic tool be integrated into the decision-making process and how will staff be trained to understand outputs sufficiently to challenge them when necessary? How do we avoid their input just being tokenistic?	No	If you are not sure if the AI is using Automated Decision Making check with DPA@camden.gov.uk or the data protection advice team person advising you.
Planning stage	Are there mechanisms in place for members of the public to review or appeal decisions? If yes, please explain. If not, why?	N/A	
Planning Stage	Are the roles and responsibilities for the introduction and use of AI clearly set out? Are they documented so everyone knows who is responsible for what? Where are they documented?	Yes – the Generative AI Project from Technology Adoption will include comprehensive documentation, training and workshops to clearly set out the rules and expectations for those using these tools to ensure they are used in line with best practice. The Human in the Loop principle will be applied by all users who will still own any produced communications.	

Planning Stage	Is there a need to consult with affected data subjects or other stakeholders like unions? If yes, who? Have you consulted and what were the outcomes?	Unions have been consulted as part of the entire Generative AI Project from Technology Adoption. They are supportive of the work being undertaken. As general written communications are the product of officers, they will be aware of any changes to their own work. We will monitor if Grammarly is used in relation to any other data subjects on a case-by-case basis.	
Planning Stage	How do we make sure there is no function creep in the AI and its usage?	The tool is used to improve grammar in written communications so there is little scope for function creep. We will review documentation in line with Camden policy. Use cases are being generated through a controlled programme with risk checks, training and guidance. Licenses will be handled centrally by Technology Adoption so we will be able to monitor for any ongoing changes.	
Planning Stage and AI Training and Testing	Will the AI use training data? If yes where is that coming from? How do we make sure it isn't biased/discriminatory? How do we make sure that the training data is proportionate ie that we are not using irrelevant/too much data for training	No – Grammarly Enterprise Accounts: “For all Enterprise-tier accounts and Grammarly Business accounts purchased through Grammarly’s sales team, and all Grammarly for Education accounts, Product Improvement and Training is automatically OFF, meaning Grammarly is not using these organizations’ content to train models or improve its product for other users. For these types of accounts, this setting cannot be changed.” “We do not train on any organization content from users whose account originates in the EU, UK, Iceland, Norway, Liechtenstein, or Switzerland, regardless of the setting of this control.”	

Planning Stage and AI Training and Testing	Are we using resident/staff/other council data to train the AI? If no, where is the data coming from?	No – Grammarly use licensed and proprietary datasets and has indicated that it uses licensed, proprietary, and publicly available data to train its AI models. This includes: • Datasets they have created internally through years of user interactions (anonymized and aggregated) from free accounts. • Licensed corpora of correct and incorrect English usage. • Academic texts, books, articles, and other written materials they've obtained rights to use.	
Planning Stage	If yes, what is our legal basis for that? Is the usage in the Privacy Notice?	N/A	
Planning Stage	How fair and proportionate is the usage for AI training?	N/A	
Testing and Training the AI	Legal basis for training data: (Data Protection Advice Team will discuss this with you)	N/A Grammarly Business Accounts: “We do not train on any organization content from users whose account originates in the EU, UK, Iceland, Norway,	

		Liechtenstein, or Switzerland, regardless of the setting of this control.”	
Testing and Training the AI	Has the Information Security Team conducted a Security Assessment of the AI?	Yes	
Testing and Training the AI	Can you provide a list of models that feature within the tool? E.g. rule-based, machine learning, and other statistical or mathematical models.	Model – GrammarlyGO	
Testing and Training the AI	Can you describe the model architecture? E.g. Is the type of model random forest classifier, convolutional neural network, transformer, etc? This can also include a short description of the method(s) of optimisation employed.	Grammarly employs a hybrid approach in its AI functionality, integrating transformer-based language models with rule-based systems and other machine learning techniques. This combination allows for nuanced and context-aware writing assistance. Transformer models, such as BERT and GPT, are central to Grammarly's architecture. These models utilize self-attention mechanisms to process and understand the relationships between words in a sentence, enabling more accurate grammar correction and text generation. In addition to transformer models, Grammarly incorporates	

		rule-based systems and other machine learning algorithms to enhance its performance. This multifaceted approach allows Grammarly to provide comprehensive writing assistance, balancing the strengths of different methodologies. Overall, Grammarly's AI functionality is built upon a foundation of transformer-based models, complemented by rule-based systems and other machine learning techniques, to deliver effective and contextually aware writing support.	
Testing and Training the AI	Has it passed?	It has been approved.	
Review of Training and testing	How do we review the outcomes of the AI training to make sure the outputs are as expected, not biased or discriminatory?	The GenAI programme will be putting in place a training and monitoring system proportionate to the use cases of each AI tool it tests to identify if bias is being seen in outputs. This will be monitored across the programme and on a tool by tool bases, including Grammarly.	E.g. If data for this AI tool is processed outside Camden, can results be tested against demographic data available internally at Camden to prove data bias has not caused discriminatory results?
Review of Training and testing	How do we guard against undetected function creep caused by a learning algorithm developing in an unpredicted way	The tool is used to improve grammar in written communications so there is little scope for function creep. The GenAI programme and Technology Adoption monitor the roadmaps and development of the tools it is responsible, and will be aware of any fundamental functionality changes that would need review.	

Deployment and monitoring	How do we guard against overfitting caused by a learning algorithm paying too much attention to the specific features in the training datasets leading to inaccurate or discriminatory outputs	The GenAI programme will be putting in place a training and monitoring system proportionate to the use cases of each AI tool it tests to identify if bias is being seen in outputs. This will be monitored across the programme and on a tool by tool bases, including Grammarly.	
Deployment and monitoring	How do we check that the AI isn't producing discriminatory outcomes caused by the algorithm	This is unlikely- the tool will check grammar in written communications rather than suggesting any specific outcomes in relation to individuals. The GenAI programme will be putting in place a training and monitoring system proportionate to the use cases of each AI tool it tests to identify if bias is being seen in outputs. This will be monitored across the programme and on a tool by tool bases, including Grammarly.	