



Ministry of Defence

Ministry of Defence
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Ben Donaldson
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10 September 2021

Dear Mr Donaldson,

Thank you for your email of 17 August 2021 requesting the following information:

- The text of the MOD's "AI Ethics Policy"
- A list of the experts interviewed so far from across the MOD, Academia, Industry and Civil Society in relation to the AI Ethics Policy
- A list of all consultation activities the MOD has conducted in relation to military AI ethics since 2019, including the names of any external companies, institutions, civil society organisations, academics or individuals the MOD has engaged with
- The details of any public consultation, engagement or calls for evidence that the MOD has conducted on military AI ethics since 2019
- The anticipated publication date and consultation plans for the forthcoming AI Strategy, which was mentioned in the Integrated Review
- The number of employees and job titles of the staff working as part of:
 - o The Defence AI and Autonomy Unit
 - o The Centre for Data Ethics and Innovation
 - o The Office for AI
 - o Defence Digital's AI Centre of Expertise
 - o The Counter Proliferation and Arms Control Centre

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOIA).

A search for the information has now been completed within the Ministry of Defence, and I can confirm that some information in scope of your request is held.

The following information you have requested is held by the Ministry of Defence, and can be found enclosed, below at Annex A:

- A list of all consultation activities the MOD has conducted in relation to military AI ethics since 2019.
- The details of any public consultation, engagement or calls for evidence that the MOD has conducted on military AI ethics since 2019.
- The anticipated publication date and consultation plans for the forthcoming AI Strategy, which was mentioned in the Integrated Review.

- The number of employees and job titles of the staff working as part of:
 - o The Defence AI and Autonomy Unit.
 - o Defence Digital's AI Centre of Expertise.
 - o The Counter Proliferation and Arms Control Centre.

The following information you have requested is not held by the Ministry of Defence, as it pertains to organisations within the Department for Digital, Culture, Media and Sport:

- The number of employees and job titles of the staff working as part of:
 - o The Centre for Data Ethics and Innovation.
 - o The Office for AI.

The following information you have requested falls entirely within the scope of the qualified exemptions provided for at section 22 (Information intended for future publication) of the FOIA and has been withheld.

- The text of the MOD's "AI Ethics Policy".
- A list of the experts interviewed so far from across the MOD, Academia, Industry and Civil Society in relation to the AI Ethics Policy.
- The names of any external companies, institutions, civil society organisations, academics or individuals the MOD has engaged with [as part of consultation activities the MOD has conducted in relation to military AI ethics since 2019].

Section 22 is a qualified exemption and is subject to public interest testing which means that the information requested can only be withheld if the public interest in doing so outweighs the public interest in disclosure.

Section 22 has been applied to the above request because it contains information which is held with a view to publication at the time that the request was made. The balance of public interest was found to be in favour of withholding the information given that the information is scheduled to be published in the upcoming months, which will provide suitable accountability and transparency to the department's work on this subject. Furthermore, withholding information until its scheduled release will situate the requested information in its correct context, accompanied by wider information included in the AI Strategy and aid full public understanding of the MOD's work.

If you have any queries regarding the content of this letter, please contact this office in the first instance. If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.gov.uk). Please note that any request for an internal review should be made within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely,

Defence AI and Autonomy Unit (DAU)

ANNEX A

Consultation activities the MOD has conducted in relation to military AI ethics since 2019

And

Details of any public consultation, engagement or calls for evidence that the MOD has conducted on military AI ethics since 2019

The MOD has carried out no formal public consultations or calls for evidence on the subject of military AI ethics since 2019. It has conducted informal engagement in the form of depth interviews with AI experts, and has held the following closed doors engagement events:

- February 2020: The Permanent Secretary for Defence held a roundtable on the subject of AI ethics with leading AI experts from industry, academia and civil society
- October 2020: The Defence AI & Autonomy Unit held a roundtable on the subject of AI ethics policy and principles with leading AI experts from industry, academia and civil society
- October & November 2020: In partnership with the Centre for Data Ethics and Innovation, the MOD hosted a series of thematic roundtable workshops on military AI ethics with experts from across the AI landscape, on the following subjects:
 - Control, Responsibility and Accountability
 - Safety, Predictability and Transparency
 - Governance, Enforcement, Training and Culture
 - Proliferation and International collaboration
 - Legitimacy and Lethal Autonomous Weapons Systems

Anticipated publication date and consultation plans for the forthcoming AI Strategy, which was mentioned in the Integrated Review

The AI Strategy is, under current timelines, planned for publication in Autumn 2021, containing the MOD's AI ethics principles. The MOD will also release an accompanying document on the subject of AI ethics, detailing further policy on the subject. Under current timelines, there is no formal consultation plan associated with the publication of the Strategy, beyond the informal consultation work carried out since 2019.

Employees and job titles of staff working on AI Ethics in the Ministry of Defence

The **Defence AI and Autonomy Unit (DAU)** consists of three full time employees:

- Associate head for Strategy and Policy, DAU (B2).
- Strategy and Policy lead, DAU (C1).
- Coherence lead, DAU (C1).

And are overseen by two further employees:

- Deputy head for Strategy and Policy, Defence Science & Technology Policy (B1)
- Head of Defence Science and Technology Policy & Head of the DAU (SCS 1)

The **Counter Proliferation and Arms Control Centre** consists of 37 employees across the MOD and FCDO, four of whom have responsibility for LAWS work:

- CPACC Conventional-MOD-2 (C1).
- CPACC Conventional-MOD-Assistant Head (B2).

- Head of CPACC Conventional Cluster (B1).
- Head of CPACC (SCS 1).

The **Defence Digital AI Centre for Expertise** is no longer a unit within the MOD. During the department's development of AI Ethics policy, it consisted of 1 full time employee, aided by contractors, one of whom was responsible for AI Ethics. Therefore, the roles responsible for this were:

- CIO AI Centre of Expertise Lead (B2).
- AI Centre of Expertise Contractor (SEO equivalent).