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Services
Australia

Draft AI Assurance Plan

June 2024

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Automation and Service Optimisation Branch

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Purpose

The agency needs to engage responsibly, ethically, and safely with AI to innovate and modernise government services so people can get on with their lives.

In 2024, the agency's AI strategy was approved by the Executive Committee. The strategy states that all initiatives using AI will develop an AI Assurance Plan to ensure they are appropriately managed.

This document is to be used as a template for an assurance plan. This document is to be used by initiatives from discovery, to implementation, to on-going support and assurance. If a section does not yet apply to an initiative (e.g. it is only in discovery), **do not delete it** – provide justification as to why it doesn't yet apply.

Background

This document brings key considerations from the agency's AI strategy and the Digital Transformation Agencies Draft Commonwealth AI Assurance Framework into one tool that is to be used to ensure that AI is engaged with in accordance to Whole of Government guidelines and that the agency is engaging responsibly, ethically, and safely with AI.

At a time when public trust in the Australian Government is decreasing, the ethical use and protection of personal data when it comes to AI will be pivotal.

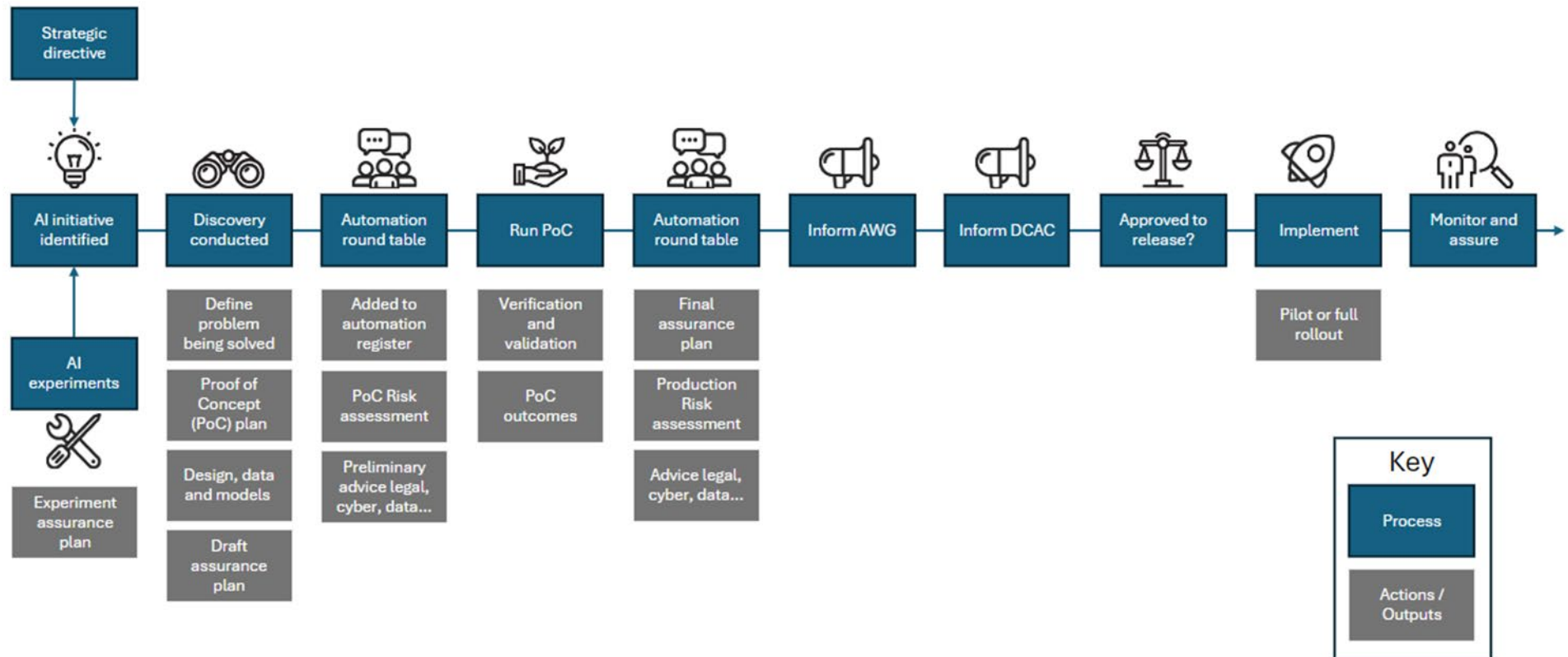
Our responsibility is to make the most of government investments in our capability in a way that maximises the benefit to our customers through proactive, informed and carefully considered action. For this reason, Services Australia has an imperative to engage with AI now.

This assurance plan is part of the agency's Automation governance and assurance framework, which includes the consideration of AI use cases. It should be used by projects/initiatives that are using AI as part of their solution, and should be used to assist and complement the existing agency governance and assurance processes.

The use of this assurance plan does not remove the need for a project/initiative owner to engage with corporate governance requirements, project management processes, risk management responsibilities processes, change management processes, and the Chief Information and Digital Officer's architectural, design, cyber security, procurement, and release management processes. It should not be considered, or used in isolation of these other project/initiative owner responsibilities.

The Commonwealth AI Assurance Framework is the bases for the questions that are required to be answered in this assurance plan. The purpose of Commonwealth AI Assurance Framework is to guide Australian government agencies through impact assessment of AI use cases against Australia's AI Ethics Principles. It is intended to complement and strengthen – not duplicate – existing frameworks, legislation and practices that touch on government's use of AI. It should be read and applied alongside the Policy for the responsible use of AI in government and existing frameworks and laws to ensure agencies are meeting all their current obligations.

High-level AI Governance process



1. Basic information

1.1 AI use case profile

Complete the information below.

Name of AI use case	Use of the Vervoe bespoke online skills assessment tool in Recruitment
Reference number	
Lead agency	Services Australia
Assessment contact officer	Section 22
Executive sponsor	Name: Ben Bolt Email: Section 22

In plain language, briefly explain how you are using or intend to use AI. 200 words or less.

AI use case description

The Vervoe bespoke* online skills assessment tool (Vervoe tool) is one of multiple assessment methods used in large scale recruitment processes (which attract 5,000-10,000 applications) to quickly and consistently assess and score candidate responses against the capabilities of the advertised role.

Using a mix of binary and non-binary assessment questions designed and approved by a diverse group of Services Australia representatives (the representatives) and real-life candidate responses to the assessment questions, the Vervoe tool is taught what a poor, good and excellent response looks like. This process is referred to as optimisation and is done by the representatives.

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*Bespoke refers to Services Australia having total design of the product. Elements of AI have been turned off. For example, assessing how quickly a candidate responds to an assessment question.

Briefly explain what type of AI technology you are using or intend to use. 100 words or less.

Type of AI technology

The Vervoe tool uses supervised learning (a type of machine learning model), designed to replicate human assessment grading.

1.2 Lifecycle stage

These stages can take place in an iterative manner and are not necessarily sequential. They are adapted from the OECD's definition of the AI system lifecycle. Refer to Guidance for further information. Select only one.

Which of the following lifecycle stages best describes the current stage of your AI use case?

Early experimentation <i>Note: Assessment not required.</i>	<input type="checkbox"/>
Design, data and models	<input type="checkbox"/>
Verification & validation	<input type="checkbox"/>
Deployment	<input type="checkbox"/>
Operation and monitoring	<input checked="" type="checkbox"/>
Retirement	<input type="checkbox"/>

1.3 Review date

Assessments must be reviewed when use cases either move to a different stage of their lifecycle or significant changes occur to the scope, function or operational context of the use case. Consult the guidance and, if in doubt, consult the DTA.

What is the next date/milestone that will trigger the next review of the AI use case?

Following the completion of any recruitment process where the Vervoe tool is used, National Recruitment review lessons learned and incorporate relevant findings in future processes.

1.4 Assessment review history

Track the review history for this assessment in the table below. Include brief summaries of changes arising from reviews (50 words or less).

Summary of changes arising from review	Review date
<p>1. <i>Evolution of questions being asked. For example on one occasion we asked candidates to research and return responses from a Services Australia internet page. While the assessment was live, the website was updated resulting in candidates unable to find and return the expected response.</i></p> <p><i>Lesson learned from this experience was to not direct candidates to live websites.</i></p>	<p><i>2023-24 Entry Level Service Delivery Pipeline Pilot</i></p>

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2. Purpose and expected benefits

Under [Australia's AI Ethics Principles](#), the use of AI should have a clearly defined and beneficial purpose that is consistent with human, societal and environmental wellbeing.

2.1 Problem definition

Use 100 words or less.

Clearly and concisely identify the problem you are trying to solve

The agency has an urgent and constant need for a supply of suitable APS3/4 entry level candidates to meet the demand of Australian citizens at any given time, as well as address natural attrition. As a result, we regularly advertise these roles which attract 5,000-10,000 applications.

We need a cost effective solution to assess candidates quickly and consistently, neither of which would occur should a human panel be required to assess this volume of applications.

2.2 AI use case purpose

Use 200 words or less.

Clearly and concisely describe the purpose of your use of AI, focusing on how it will address the problem you have identified

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2.3 Non-AI alternatives

Use 100 words or less.

Briefly outline non-AI alternatives that could address this problem

There are no non AI alternatives that could consistently assess up to 10,000 applicants and create a readily available merit pool within a 6-8 week timeframe in a cost effective way.

2.4 Identifying stakeholders

Identify stakeholder groups that may be affected by the AI use case and briefly describe how they may be affected, whether positively or negatively. This will guide your consideration of expected benefits and potential risks in this assessment.

Consider holding a brainstorm or workshop to help identify affected stakeholders and how they may be affected. A discussion prompt is provided in the guidance document.

Stakeholder group	Briefly describe how they may be affected
Services Australia customers	Not having a readily available pool of suitable candidates available to use at short notice will impact the services our customers receive – particularly in times of crisis.
Agency staff	Agency will be unable to meet our customer's demand. Adverse impact on staff mental health and workplace culture. Higher workload and higher costs if the Vervoe tool is not used.
Media / CPSU	A lengthy recruitment process if the Vervoe tool is not used. Inconsistent assessment of candidates (if the Vervoe tool is not used) may result in an increase in candidates complaints escalating through the media/CPSU resulting in reputational damage for the Agency.
Senior Executive	Not adequately utilising staffing budget may mean ASL staffing budgets are reduced. Managing reputational damage as a fall out of long recruitment processes, resulting in staff pressures and increased wait times for customers.
Candidates	May not understand how the Vervoe tool works which will cause concern and risk agency reputation. However this can be mitigated following careful review of our communication suite.
National recruitment team	Higher workload/costs if the Vervoe tool is not used.

2.5 Expected benefits

Considering the stakeholders identified in the previous question, identify the expected benefits of the AI use case. This should be supported by quantitative and/or qualitative analysis.

Qualitative analysis should consider whether there is an expected positive outcome and whether AI is a good fit to accomplish the relevant task, particularly compared to non-AI alternatives identified. Benefits may include gaining new insights or data.

Consult the guidance document for resources to assist you. Aim for 300 words or less.

What are the expected benefits of the AI use case?

Ability to meet federal government commitments to bolster staff numbers amid a backlog of claims.

For example, during July 2023-April 2024, the agency piloted an ‘apply at anytime’ recruitment drive, with the intention of having a readily available pool of suitable candidates who could be employed at anytime, across Australia, to fill ASP3 and APS4 entry level service delivery positions.

During this time, we received ran 13 recruitment processes which attracted over 72,000 applications. Using the Vervoe tool, the agency was able to complete each recruitment processes within a 6-8 week timeframe, and employed 5,000 new staff to deliver the Minister’s commitments. This would not have been possible with a human panel.

Able to quickly meet the need for staffing during unexpected circumstances such as:

1. Minister announcements
2. Natural disasters
3. Pandemics

Candidate recruitment experience is enhanced as it is completed within an 6-8 week period.

It uses an assortment of mediums (multiple choice, free text, audio, video) making the tool an interactive and modern experience for the user.

Reduces unconscious bias.

3. Threshold assessment

Using the risk matrix, determine the severity of each of the risks in the table below, accounting for any risk mitigations and treatments. Provide a rationale and an explanation of relevant risk controls that are planned or in place. The Guidance document contains consequence and likelihood descriptors and other information to support the risk assessment.

The risk assessment should reflect the intended scope, function and risk controls of the AI use case. Keep the rationale for each risk rating clear and concise, aiming for no more than 200 words per risk.

Risk Matrix					
Likelihood/Consequence	Insignificant	Minor	Moderate	Major	Severe
Almost certain	Medium	Medium	High	High	High
Likely	Medium	Medium	Medium	High	High
Possible	Low	Medium	Medium	High	High
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Low	Medium	Medium

What is the risk of the use of AI...	Risk severity
1. Negatively affecting public accessibility or inclusivity of government services	Low <input checked="" type="checkbox"/> Med <input type="checkbox"/> High <input type="checkbox"/>
Rationale for risk rating and explanation of relevant risk controls: As part of the application process, candidates are asked if they require reasonable adjustment to participate in the recruitment process. Where a candidate answers ‘Yes’, they are asked to provide details of the reasonable adjustment required.	

In the job pack, a document containing information about the role and the recruitment process which is attached to the job advertisement, we include in two different sections, a request that candidates make contact as soon as possible should they require any reasonable adjustments.

Where a candidate is unable to access the Vervoe tool, our third-party recruitment provider will identify an alternate way for the candidate to complete the assessment. For example:

- Auslan interpreter for an applicant who is hearing impaired
- extra reading time during assessment activities for a person with learning difficulties
- accessible software for a person with vision impairment
- someone with unreliable home internet could attend a public library to complete the assessment.

2. Unfairly discriminating against individuals, communities or groups

Low X Med ☐

High ☐

Rationale for risk rating and explanation of relevant risk controls:

The following relates to the use of AI, however it is more a risk around human involvement – specifically how human's teach the AI.

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Finally, National Recruitment ensures as much as possible that the SMEs are diverse in terms of age, cultural background, work experience and gender.

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3. Perpetuating stereotyping or demeaning representations of individuals, communities or groups	Low X Med <input type="checkbox"/> High <input type="checkbox"/>
Rationale for risk rating and explanation of relevant risk controls: As above.	
4. Harming individuals, communities, groups, organisations or the environment	Low X Med <input type="checkbox"/> High <input type="checkbox"/>
Rationale for risk rating and explanation of relevant risk controls: As above.	
5. Compromising privacy due to the sensitivity, amount or source of the data being used by an AI system	Low X Med <input type="checkbox"/> High <input type="checkbox"/>
Rationale for risk rating and explanation of relevant risk controls: We acknowledge there is a risk that candidate privacy may be compromised if privacy is breached, noting that the only data the Vervoe tool receives is candidate's first name, last name and email address, and their responses to the assessment questions. Prior to commencing a job application, candidates must agree to the following privacy policy, which includes information about how their data is used: <u>Services Australia - Privacy Policy</u> We are the process of obtaining a Privacy Impact Assessment which will include recommendations that we will implement to mitigate privacy risks. We've also confirmed in discussion with Cyber Security that all data is hosted on Amazon Web Services Sydney and required protocols are put in place to store data secularly.	
6. Raising security concerns due to the sensitivity or classification of the data being used by an AI system	Low X Med <input type="checkbox"/> High <input type="checkbox"/>
Rationale for risk rating and explanation of relevant risk controls: As above.	
7. Raising security concerns due to the implementation, sourcing or characteristics of the AI system	Low X Med <input type="checkbox"/> High <input type="checkbox"/>

Rationale for risk rating and explanation of relevant risk controls:

Not relevant as we don't implement the Vervoe tool.

8. Influencing decision-making that affects individuals, communities, groups, organisations or the environment

Low X Med ☐

High ☐

Rationale for risk rating and explanation of relevant risk controls:

Decisions result in minor inconveniences or errors affecting the public, business operations or finances or slight environmental impacts.

All impacts reversible with prompt action.

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Based on the collective scores, the Services Australia delegate decides on what score a candidate needs to receive in order to progress to the next stage of assessment.

This decision is made on scores only – the candidate's details are not included in this decision making process.

9. Posing a reputational risk or undermining public confidence in the government

Low ☐ Med X

High ☐

Rationale for risk rating and explanation of relevant risk controls:

Machine learning may create an assumption that there is no human interaction/assessment or involvement however there is a diverse group of representatives who work with National Recruitment to design, test, optimise and teach the Vervoe tool each time it is used in a recruitment process.

We believe this could be easily mitigated by updating appropriate communications (job pack, candidate emails) to clearly explaining in our various communication channels how the Vervoe tool works and how assessments are scored.

Assessment contact officer recommendation

If the assessment contact officer is satisfied that all risks in the threshold assessment are low, then they may recommend that a full assessment is not needed and that the agency accept the low risk.

If one or more risks are medium or above, then a full assessment must be completed unless you amend the AI use scope, function or risk controls such that the assessment contact officer is satisfied that all risks in the threshold assessment are low.

You may decide not to accept the risk and not proceed with the AI use case.

Recommendation	A full assessment [is / is not] necessary for this use case.
Comments (optional)	
Name & position	Section 22 Assistant Director, National Recruitment team Section 22 Director, National Recruitment team
Date	

Executive sponsor endorsement

Endorsement	I have reviewed the recommendation, am satisfied by the supporting analysis and agree that a full assessment [is / is not] necessary for this use case.
Comments (optional)	
Name & position	Ben Bolt, National Manager Recruitment and Onboarding branch
Date	

4. Fairness

Under [*Australia's AI Ethics Principles*](#), AI systems should throughout their lifecycle be inclusive and accessible and should not involve or result in unfair discrimination against individuals, communities or groups.

4.1 Defining fairness

Where appropriate, you should consult relevant domain experts, affected parties and stakeholders to determine how to contextualise fairness for your use of AI. Consider inclusion and accessibility. Consult the guidance document for prompts and resources to assist you.

Do you have a clear definition of what constitutes a fair outcome in the context of your use of AI?

Yes ☒

N/A ☐

No ☐

The Vervoe tool is bespoke - meaning Services Australia having total design of the product as opposed to using an 'off the shelf' product. It learns how to assess and score candidate responses by being optimised by Services Australia representatives.

Once all candidates have been assessed, scores (not personal information) are provided to the delegate who determines the what score candidates need to have achieved to be found successful at the APS3 and APS4 levels. This is referred to as a benchmark.

4.2 Measuring fairness

Measuring fairness is an important step in identifying and mitigating fairness risks. A wide range of metrics are available to address various concepts of fairness. Consult the guidance document for resources to assist you.

Do you have a way of measuring (quantitatively or qualitatively) the fairness of system outcomes?

Yes ☒

N/A ☐

No ☐

The Vervoe tool is always used in conjunction with other assessment methods to ensure fairness. These vary depending on the methodology and the capabilities being assessed. For example, we may also review candidates work history and/or we may conduct an interview.

Further information can be found under **sections 1.1 and 2.2**.

5. Reliability and Safety

Under [Australia's AI Ethics Principles](#), AI systems should throughout their lifecycle reliably operate in accordance with their intended purpose.

5.1 Data suitability

Consider data quality and factors such as accuracy, timeliness, completeness, consistency, lineage, provenance and volume.

If your AI system requires the input of data to operate, or you are training or evaluating an AI model, can you explain why the chosen data is suitable for your use case?

Yes ☒

N/A ☐

No ☐

The data used to train the Vervoe tool aligns with the capabilities that candidates are being assessed against.

Services Australia representatives develop questions and expected responses to assess candidates' capability against the advertised role.

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A Services Australia delegate reviews and endorses the questions and responses to ensure relevancy to the advertised role.

Further information can be found at **section 1.1**.

5.2 Indigenous data

Consider whether your use of Indigenous data and AI outputs is consistent with the expectations of Indigenous people, and the forthcoming [Framework for Governance of Indigenous Data \(GID\)](#). See definition of Indigenous data in guidance material.

If your AI system uses Indigenous data, including where any outputs relate to Indigenous people, have you ensured that your AI use case is consistent with the Framework for Governance of Indigenous Data (expected in 2024)?

Yes ☐

N/A ☒

No ☐

There is no use of Indigenous data with the Vervoe tool.

5.3 Suitability of procured AI model

May include multiple models or a class of models. Includes using open-source models, application programming interfaces (APIs) or otherwise sourcing or adapting models. Factors to consider are outlined in Guidance.

If you are procuring an AI model, can you explain its suitability for your use case?

Yes ☒

N/A ☐

No ☐

We use the preferences model.

This model requires input from the user to train it to understand what the scale of bad to good answers look like for their specific use case. This method uses a model called “iterative”, where a user grades a set of candidate responses to individual questions by giving them a score of 0-10.

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This variation in responses helps the model quickly identify and plug the gaps in between the potential score ranges to accurately grade all candidates with your preferences in mind.

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5.4 Testing

Outline any areas of concern in results from testing. If testing is yet to occur, outline elements to be considered in testing plan (for example, the model’s accuracy).

Has the AI system been tested sufficiently and are you satisfied with its reliability and safety for the context of your use case?

Yes ☒

N/A ☐

No ☐

The Vervoe tool has been used by the agency since 2022. Each time it’s used in a recruitment process, it’s optimised for that process only.

Following the completion of any recruitment process where the Vervoe tool is used, National Recruitment review lessons learned and incorporate relevant findings in future processes.

5.5 Pilot

If answering ‘yes’, explain what you have learned or hope to learn in relation to reliability and safety and, if applicable, outline how you adjusted the use of AI.

Have you conducted, or will you conduct, a pilot of your use case before deploying?

Yes ☐

N/A ☒

No ☐

The Vervoe tool has been used by the agency since 2022.

5.6 Monitoring

If answering 'yes', explain how you will monitor and evaluate performance.

Have you established a plan to monitor and evaluate the performance of your AI system?

Yes ☒

N/A ☐

No ☐

Refer to **sections 1.3 and 1.4**.

5.7 Preparedness to intervene or disengage

See guidance document for resources to assist you in establishing appropriate processes.

Have you established clear processes to intervene or safely disengage the AI system if stakeholders raise valid concerns with insights or decisions or an unresolvable issue is identified?

Yes ☒

N/A ☐

No ☐

To date, we have not identified any significant concerns. Minor concerns have been raised and addressed at the time.

Should significant issues be identified we would disengage with Vervoe and undertake a recruitment exercise using different assessment methods and tools.

6. Privacy protection and security

Under [Australia's AI Ethics Principles](#), AI systems should throughout their lifecycle respect and uphold privacy rights and data protection, and ensure data security.

6.1 Minimise and protect personal information

See guidance on data minimisation and privacy enhancing technologies.

Are you satisfied that any collection, use or disclosure of personal information is necessary, reasonable and proportionate for your AI use case?

Yes ☒

N/A ☐

No ☐

Aside from first name, last name and email address, the Vervoe tool doesn't receive a candidate's personal information.

Further information can be found under **section 3, risk 5**.

6.2 Privacy assessment

Has a Privacy Threshold Assessment or Privacy Impact Assessment been undertaken?

Yes ☒

N/A ☐

No ☐

Privacy Threshold Assessment – Complete

Privacy Impact Assessment – Underway

6.3 Authority to operate

Engage with your agency's IT Security Adviser and consider the latest security guidance and strategies for AI use (such as [Engaging with AI](#) from the Australian Signals Directorate).

Has the AI system been authorised to operate in your environment, in accordance with policy requirements in PSPF Policy 11: Robust ICT systems?

Yes ☐

N/A ☐

No ☒

We've engaged with the following groups

Cyber Capabilities. On review of documentation provided the team advised that an Information Registered Assessor's Program (IRAP) would need to be completed. After further discussion it was evident that there was misunderstanding and after further explanation of the process, data shared etc the only concern raised was the potential that candidates could include sensitive information in their assessment responses where free text was allowed.

Recommendations

1. Only allow for multiple choice responses and remove the option for free text and/or
2. Include an introduction page before candidates use the Vervoe tool, advising:
 - services Australia does not have control over the information they enter/submit
 - they're leaving a government hosted site
 - they should not enter personal or sensitive information in their responses to the assessment questions.



Transcript -
CPE-4549 CYBER SEC

Fraud Control and Investigations Division. On review of documentation provided the team several questions were asked regarding the 'training' of the machined learning. All of which were able to be responded to. No further concerns were raised

7. Transparency and explainability

Under ***Australia's AI Ethics Principles***, there should be transparency and responsible disclosure so people can understand when they are being significantly impacted by AI and can find out when an AI system is engaging with them.

7.1 Consultation

Refer to the list of stakeholders identified in section 2. Seek out community representatives with the appropriate skills, knowledge or experience to engage with AI ethics issues. Consult the guidance document for prompts and resources to assist you.

Have you consulted stakeholders representing all relevant communities or groups that may be significantly affected throughout the lifecycle of the AI use case?

Yes ☒

N/A ☐

No ☐

Candidates can find information in the job pack and email notifications. The content in these communications will likely be strengthened depending on the recommendations that come out of the Privacy Impact Assessment.

The following business areas/representatives have been engaged and documents provided to all relevant stakeholders:



2a. NM approved Privacy Threshold As



5 DataTEST August 2024 final.xlsm



4c. DTEC Vervoe and Criteria - Data T



7. Vervoe and Criteria Data Manag



8. Vervoe AI Assurance plan v2.0.



Vervoe



Vervoe

Subprocessor-List.d Service-Level-Agreer

Data strategy and governance – Section 22

Advised we were required to complete a Data Management Plan, which has been completed and led to connecting with Legal to do a Privacy Threshold Assessment (completed) and Privacy Impact Assessment (in progress).

Automation and Architecture – Section 22

Outcome: Advised we need to complete this Assurance Plan (in progress).

Digital Delivery and Privacy Legal – Section 22

Outcome:

- Engaged an external law firm to complete the Impact Assessment (in progress)

Public Law Advice Request Form as per Public Law Legal Advice requirements – This form was not required to be complete as legal reached out directly to us seeking advice.

Cyber Capabilities Section 47E

Section 22

Outcome: Refer to **section 6.3**.

Fraud Control and Investigations Division –

Section 47E, **Section 22**

Outcome: Refer to **section 6.3**.

7.2 Public visibility

See Guidance document for advice on appropriate transparency mechanisms, information to include and factors to consider in deciding to publish or not publish AI use information.

Will appropriate information (such as the scope and goals) about the use of AI be made publicly available?

Yes ☒

N/A ☐

No ☐

All information will be made available on request unless commercial in confidence.

The National recruitment is transparent in the use of recruitment tools. Candidates can find information in the job pack and email notifications.

*We will implement the recommendations from Cyber Capabilities (**section 6.3**).*

Information is also publicly available on the Vervoe website:

[Recruitment Platform & Hiring Solution | Skills Based Screening](#)

7.3 Maintain appropriate documentation and records

Ensure you comply with requirements for maintaining reliable records of decisions, testing and the information and data assets used in an AI system. This is important to enable internal and external scrutiny, continuity of knowledge and accountability.

Have you ensured that appropriate documentation and records will be maintained throughout the lifecycle of the AI use case?

Yes ☒

N/A ☐

No ☐

Candidate data and documentation relating to each individual selection process (including assessment outcomes and scores) is stored within Hire Road for up to 7 years.

7.4 Disclosing AI interactions and outputs

Consider members of the public or government officials that may interact with the system or decision makers that may rely on its outputs.

Will people directly interacting with the AI system or relying on its outputs be made aware of the interaction or that they are relying on AI-generated output? How?

Yes ☒

N/A ☐

No ☐

All information will be made available on request unless commercial in confidence.

The National recruitment is transparent in the use of recruitment tools. Candidates can find information in the job pack and email notifications.

We are in the process of organising a privacy impact assessment which will come with recommendations on the use of AI from a privacy perspective which will be implemented where appropriate.

7.5 Offer appropriate explanations

If your AI system will materially influence decision-making by or about individuals, groups, organisations or communities, will your AI system allow for appropriate explanation of the factors leading to AI-generated decisions, recommendations or insights?

Yes ☒

N/A ☐

No ☐

The Vervoe tool assesses candidate responses the way it is taught by the Services Australia representatives.

It assesses the candidate responses as excellent, good and poor and allocates a score. The delegate then determines the benchmark based on these scores.

*Further information can be found under **section 4.1**.*

8. Contestability

Under [Australia's AI Ethics Principles](#), when an AI system significantly impacts a person, community, group or environment, there should be a timely process to allow people to challenge the use or outcomes of the AI system.

8.1 Notification of AI affecting rights

See Guidance document for help interpreting 'administrative action', 'materially influenced' and 'legal or similarly significant effect' as well as recommendations for notification content.

Will individuals, groups, organisations or communities be notified if an administrative action with a legal or similarly significant effect on their rights was materially influenced by the AI system?

Yes ☒

N/A ☐

No ☐

To date, no issues have arisen.

8.2 Challenging administrative actions influenced by AI

Administrative law is the body of law that regulates government administrative action. Access to review of government administrative action is a key component of access to justice. Consistent with best practice in administrative action, ensure that no person could lose a right, privilege or entitlement without access to a review process or an effective way to challenge an AI generated or informed decision.

Is there a timely and accessible process to challenge the administrative actions discussed at 8.1?

Yes ☒

N/A ☐

No ☐

Ongoing APS and Parliamentary service employees who have applied for a promotion may apply to the Merit Protection Commissioner to have certain promotion decisions reviewed.

If a candidate believes there is a defect in the recruitment process, including the use of the Vervoe tool, they can review the options available to them on the Merit Protection Commission website.

9. Accountability

Under *Australia's AI Ethics Principles*, those responsible for the different phases of the AI system lifecycle should be identifiable and accountable for the outcomes of the AI systems, and human oversight of AI systems should be enabled.

9.1 Establishing responsibilities

Where feasible, it is recommended that these three roles not all be held by the same person. The responsible officers should be appropriately senior, skilled, and qualified.

Who is responsible for:	
use of AI insights and decisions	The Vervoe team
monitoring the performance of the AI system	Section 22 - National recruitment
	Section 22
	The Vervoe team
data governance	Section 22

9.2 Training of AI system operators

With all automated systems, there is always the risk of overreliance on results. It is important that the operators of the system, including any person who exercises judgment over the use of insights, or responses to alerts, are appropriately trained on the use of the AI system. Training should be sufficient to understand how to appropriately use the AI system, and to monitor and critically evaluate outcomes.

Is there a process in place to ensure operators of the AI system are sufficiently skilled and trained?		
Yes <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	No <input type="checkbox"/>
<p>The Services Australia representatives undertake multiple training sessions in the use of the Vervoe tool. These sessions are initially run by Vervoe, followed by National Recruitment. Clear guidelines are set out in terms of how to assess candidates within the Vervoe tool.</p> <p>Depending on the size of the recruitment process, representatives may assess responses as a group initially, and then assess on their own, followed by moderation with the other representatives.</p> <p>Other times, the representatives may teach the Vervoe tool as a group until it's been optimised.</p>		

10. Human-centred values

Under [*Australia's AI Ethics Principles*](#), AI systems should throughout their lifecycle respect human rights, diversity and the autonomy of individuals.

10.1 Incorporating diversity

Consider how you have incorporated diversity of perspective through the lifecycle of your AI use case – for example, through the choice of data, composition of development and deployment teams and the stakeholder and user groups to choose to consult.

Are you satisfied that you have incorporated diversity and people with appropriately diverse skills, experience and backgrounds throughout the lifecycle of your AI use case?

Yes ☒

N/A ☐

No ☐

We are committed to ensuring candidates all have equal opportunity. Each recruitment activity includes RecruitAbility measures and reasonable adjustment arrangements that candidates can request to reduce barriers dependant on their individual requirement.

A diverse group of representatives are involved in the optimisation process including males, females and a members of the diversity and inclusion team.

10.2 Human rights obligations

It is recommended you complete this question after completing previous sections of the assessment. This approach will enable a more considered assessment of the human rights implications of your AI use case.

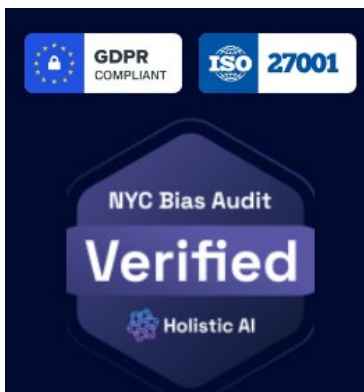
Have you consulted an appropriate source of legal advice or otherwise ensured that your AI use case and the use of data align with human rights obligations?

Yes ☒

N/A ☐

No ☐

Better Hiring Diversity



11. Internal review and next steps

11.1 Legal review of AI use case

This section must be completed by a qualified legal adviser. Ensure any supporting legal advice is available for the remaining review steps. Repeat this step if there are significant changes.

I [am/am not] satisfied that the AI use case and the use of data meet legal requirements.

Legal review outcome	I [am / am not] satisfied that the AI use case and the use of data meet legal requirements.
Comments (optional)	
Name & position of legal adviser	
Date	

11.2 Risk summary table

In the table below, list any risks identified in section 3 (the threshold assessment) or subsequently as having a risk severity of 'medium' or 'high'. Also list any instances where you have answered 'no' in any of the questions in sections 4-10.

As you proceed through internal review (section 11.3) and, if applicable, external review (section 11.4), list any agreed risk treatments and assess residual risk using the risk matrix in section 3.

Risk summary table		
Risk	Risk treatments	Residual risk
6.3 - Authority to operate not being obtained from all relevant areas	Conduct large scale human-based assessment activities	Delay in recruitment processed and significant increase in resources

11.3 Internal review of AI use case

An internal agency governance body designated by your agency's Accountable Authority must review the assessment and the risks outlined in the risk summary table.

The governance body may decide to accept any 'medium' risks, to recommend risk treatments, or decide not to accept the risk and recommend not proceeding with the AI use case.

List recommendations of your agency governance body below.

Recommendations of internal agency governance body

11.4 External review of AI use case

If, following internal review (section 11.3), there are any residual risks with a 'high' risk rating, consider whether the AI use case and this assessment would benefit from external review.

If an external review recommends further risk treatments or adjustments to the use case, your agency must consider these recommendations, decide which to implement, and whether to accept any residual risk and proceed with the use case.

If applicable, list any recommendations arising from external review below and record the agency response to these recommendations.

Recommendations from external review and agency response

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