

BVA Response to RCVS Transparency Alliance consultation on responsible AI framework

[Link to framework.](#)

Q1) How clear is the purpose of the framework? 1-5, 1 is very unclear and 5 is clear

1. 5

Are there any aspects of the framework which are unclear?

2. No

Q2) Do you think the framework is: too detailed, about right, not detailed enough

3. About right

Q3) Are there any aspects which could be removed from the framework?

4. No

Q4) Are there any aspects which are missing from the framework?

5. No

Q5) Do you think the framework will be useful for: Options: not at all useful, not useful, not sure, useful, very useful

- Veterinary AI developers
 - Those purchasing veterinary AI products
 - Users of veterinary AI products
6. This framework will be very useful for all the stakeholders listed above. It will support users and those purchasing the AI products to know what to look for when deciding which product to embed in their practice and use in their day to day roles and also encourage developers to make this information readily available.

Q6) Do you have any further comments about the framework?

7. We are very supportive of this framework, in our policy position on [Artificial Intelligence in the veterinary profession](#) we echo many of the points that are included in this document. It is necessary that veterinary professionals are empowered and able to assess the safety and governance of the tools available to them. This requires training of veterinary professionals, as well as transparency and engagement from the developers of these tools. It also requires practices to develop ethically informed policies on AI use.
8. Governance structures of AI products and the companies that provide them should be robust and clearly defined. Safeguards can be considered as technical and operational and effective governance structures should include elements of both. Technical safeguards should include transparency and explainability of the training, testing, validating and explainability of the tool. Operational safeguards should demonstrate how technology is safely deployed, what feedback loops are present and where human in or on the loop checks are used. These safeguards should cover both how the products are developed and how they are maintained and evolved over time.

Q7) How supportive are you of each of the following options for how the framework could be used. Use 1-5 not supportive to very supportive

- AI developers voluntarily displaying this information in a structured format on their websites
 - A central register, to which AI developers voluntarily add information within a structured format
 - Sharing of data from a central register for third parties to use the data to create comparison / assessment services i.e. an API
 - Comparison website, enabling people to compare different AI services based on the data available in the framework
 - Voluntary certification to confirm information is complete, based on a self-audit process from the developer
 - Voluntary certification to confirm information is complete, based on an external audit process
 - Kitemark of some kind for developers who meet the transparency standards
9. We fully support all these suggestions.

Q8) How supportive are you of each of the following options for how the framework could be funded. Use 1-5 not supportive to very supportive

- Industry funding – AI developers or other (e.g. pharmaceutical)
 - Professional association support
 - Grant funding
 - Subscription or membership fees for AI developers
 - Subscription or membership fees for AI purchasers/users
 - Voluntary certification fees for AI developers
 - A mixed model combining central funding with optional paid assurance processes (e.g. certification)
 - Private sector initiatives, private companies could be given access to data or could operate the underlying website
10. We would be more supportive of a funding system that has a degree of independence between those companies seeking validation and those funding it.

Q9) Do you have any further comments about how the framework could be used or funded?

11. To ensure trust in the outputs of the framework we would suggest a funding format which demonstrates rigour and independence to the end user. We appreciate this may make sourcing of funding more challenging, but we consider transparency on the reasons for AI developers funding the framework essential in maintaining confidence in the accuracy and transparency of the framework, avoiding any suggestion that AI developers are paying to “mark their own homework”.

Q10) The framework sets out the information AI providers should make available to veterinary professionals so that AI tools can be adopted safely, proportionately and with informed judgement. How likely are you to use the framework? 1 very unlikely – 5 very likely

12. If we are as satisfied with the final product, we would actively encourage our members to use this framework.