



Strengthening Algorithmic Transparency: From Compliance to Genuine Accountability

Although the Algorithmic Transparency Recording Standard (ATRS) became mandatory for central government in March 2024, published records remain heavily weighted towards deployed systems. The far larger universe of pilots, proofs-of-concept and procured third-party tools – where transparency arguably matters most, and where course correction is still possible – remains largely invisible to the public and to civil society.

Compounding this, the time between deployment and publication is frequently prolonged, meaning that systems are already making consequential decisions about people's lives before any meaningful public scrutiny is possible. Disclosure after the fact is not accountability.

There is also a deeper structural problem. Published records are largely inaccessible to the communities most affected by automated decision-making, and civil society currently has no formal role in scrutinising them. Transparency without participation is form without substance.

Building on work such as the *Principles for Collaborating with Residents on the Use of Automated Decision-Making Systems*, developed with GMCA and the wider Greater Manchester civil society community, and the Ada Lovelace Institute's research into algorithmic accountability, we propose that government:

- Sets binding publication timelines with transparent reporting on the causes of any delays
- Embeds ATRS obligations directly into supplier contracts, ensuring third parties cannot obstruct or defer publication
- Extends the mandate meaningfully to cover pilots and procured tools, not just

deployed systems

- Establishes a civil society review function to scrutinise published records on behalf of affected communities, ensuring transparency is two-way and resident-facing rather than simply a disclosure exercise

This directly addresses transparency, accountability and participation, builds on existing government commitments, and could be co-created with civil society organisations, combined authorities and digital rights bodies already working in this space.