Transparent Governance in an Automated Age: Challenges and Solutions in Public Authorities AI Deployment

Zijing Wang

Grandall Law Firm(Nanjing), Nanjing, China

Abstract

The integration of artificial intelligence into administrative governance has transformed public decision-making but simultaneously challenged the foundational principle of transparency in administrative law. Through a comparative legal analysis, this paper examines how automated decision-making systems—particularly the OCI ("Robo-Debt") case—expose deficiencies in procedural fairness, explainability, and accountability. It identifies the algorithmic "black box" as a structural barrier to transparency, undermining the rule of law and citizens' trust in government. The study argues that embedding Explainable Artificial Intelligence (XAI) within administrative processes offers a legal–technical solution to reconcile automation with transparency. By linking algorithmic governance to existing administrative review principles, XAI enables interpretability, justifiability, and contestability of automated decisions, thereby strengthening democratic legitimacy in the age of algorithmic administration.

Keywords

Algorithmic Governance, Administrative Law, Transparency, Explainable Artificial Intelligence (XAI), Accountability, Comparative Law

1. Introduction

With the deep integration and embedding of AI technology and government governance, a new kind of government algorithmic governance is emerging. Governments around the world are increasingly seeking to use technology and automated systems to make administrative decisions [1]. The 2004 report of the Administrative Review Board on automated decision-making identified legitimacy, fairness, rationality, openness or transparency and efficiency as "critical elements of an administrative law system" [2]. Particularly, the Hon Robert French has emphasised the importance of rationality and transparency when AI makes administrative decisions [3].

However, just as other emerging things have two sides, automated decision-making, in addition to bringing accurate, efficient and intelligent governance potential to government governance, also breeds many governance risks. Most of the previous research focuses on solving the challenge ai poses to the principle of transparency by constructing a governmental algorithmic governance system that makes the whole process of algorithmic decision-making, research and development, application, and supervision transparent. This paper, after conducting a comparative methodological study of the Europe and the United States, we propose 'Explainable Artificial Intelligence ' as an explanatory technology developed specifically for solving the problem of the algorithmic black box.

This paper adopts a comparative legal approach between the European Union and Australia to analyze how AI-driven administrative decision-making challenges the principle of transparency. Through doctrinal analysis and case-based comparison, it examines key differences in regulatory design, administrative accountability, and legal interpretation. Building upon these findings, the paper proposes the adoption of Explainable Artificial Intelligence (XAI) as a legal-technical solution to enhance algorithmic transparency and maintain public trust in automated governance.

2. Conceptual Framework: Automated Decision-Making and Transparency in Administrative Law

2.1 Automated Decision-Making as Algorithmic Governance

The automated decision-making refers to a governance model centered on algorithmic decision-making. Automated decision-making is the inevitable product of the increasing integration of artificial intelligence technology and government governance, which takes algorithmic technology as the core, and big data, artificial intelligence, cloud computing as the supporting technology, and implements algorithm-driven automation of public affairs, intelligent management and service mode. In essence, automated decision-making represents a new paradigm of administrative governance, where algorithmic logic replaces traditional bureaucratic discretion.

The rise of automated decision-making is all around us. One example is that businesses are increasingly relying on customer support chatbots, which operate autonomously while interacting with customers, to respond to customer

inquiries at any time of the day. A notable example is the chatbot developed by the global fashion company H&M, which uses information provided by customers to help them navigate clothing options and direct them to relevant sections of the online store [4].

These drivers also apply to the public sector, which is rapidly digitalizing, using data, connectivity and computing to transform the way public services are delivered and the way public officials work [5]. At the same time, governments have recognized that digitization is a means to enrich engagement between government and citizens, not an end in itself. When applied to public governance, automation can increase accuracy and efficiency but also raises legal and ethical issues. In many cases, automated systems can process compliance decisions faster and better than humans using appropriate software tools. Testing input data and input models against rules. This allows requests to be processed continuously, enhancing both service quality and staff efficiency [6].

As far as its connotation is concerned, automated decision-making is a kind of technical governance, which makes systematic and integrated use of new information technology represented by algorithms. In terms of its extension, automated decision-making is the sum pattern of the subject structure, transaction process, and target results of government governance field embedded and reconstructed by algorithmic technology. From the perspective of governance objectives, both in theory and practice, automated decision-making is expected to improve the government's governance capacity and to make the inherent traditional government governance mode transform to an automated, precise, intelligent and wise governance form.

However, the increasing automation of government decision-making and the trend towards the use of artificial intelligence (AI) present complex challenges to existing substantive and procedural rights. It involves fundamental legal principles such as transparency, procedural fairness, reviewability and administrative justice [7]. This increasing reliance on algorithms challenges the rule of law by obscuring reasoning processes and making accountability more difficult to trace. Transparency as a principle of administrative law will be discussed in detail in this article.

2.2 Transparency as a Foundational Administrative Law Principle

Whether in the fields of politics, economics or law, the principle of transparency has become a basic criterion of modern government regulation. As early as the mid-19th century, thinkers such as *Jeremy Bentham* and *John Stuart Mill* specifically discussed the principle of transparency. Such discussions have gradually become part of the liberal vision of the West. Until modern times, liberal theorists such as *Friedrich Hayek* and *John Rawls* were invariably influenced by these discussions. In the view of these Western thinkers, transparent democracy has two fundamental benefits: Firstly, it enhances the accountability of public authorities; Secondly, it can protect citizens' right to know and protect them from arbitrary power.

Specifically in the field of law, the principle of transparency has been running through the modern legal system. To paraphrase US Justice *Louis Brandeis*' famous quote, "Sunlight is the best disinfectant." In American law, the principle of transparency is not only a core principle of *Procedural Due Proce*ss in public law, but also, to some extent, has shaped the system of representative democracy through the construction of relevant legal systems [8]. In administrative law, transparency ensures that government decision-making processes remain open and reviewable, thereby strengthening both legality and public trust. Similarly, the principle of transparency has become a principle requirement in the field of public law, and has multiple manifestations in the system, including the disclosure of regulatory bases, administrative information publication, public hearings, and the duty to give reasons for administrative decisions.

One of the best-known aspects of the rule of law is that governments must be transparent and accountable for the rules they make and the decisions they take. Transparency requires that the workings of the state be made public and that individuals have access to legislation and administrative decisions [9]. It also entails the obligation of decision-makers to explain the reasoning behind their actions, thus allowing citizens to evaluate both process and outcome. This is important because individuals can understand the reasons for decisions that affect them and how future decisions may affect them. In a democracy, understanding the basics of how the law works (though not necessarily the details of decisions that affect others) is also useful for citizens to understand and then evaluate the performance of government. From this perspective, transparency functions not only as an instrument of good governance but as a safeguard of individual rights.

Accountability also requires governments to follow the law and to be accountable for their actions (for example, administrative actions can be revoked if administrative measures violate the law). Transparency and accountability are related in the sense that transparency of a decision-making process or system is a necessary (but not sufficient) condition for that process or system to be held accountable. Transparency enables external oversight, while accountability enforces internal compliance; together they uphold the rule of law. This includes accountability for respecting other rule of law principles such as equality before the law [10].

3. The Challenges that Automated Decision-Making in the Public Sector Posed to Transparency: from the Perspective of 'OCI' System

In 2003, the *Administrative Review Commission* identified a number of key federal agencies, including *Comcare*, the *Department of Defense*, the *Department of Veterans' Affairs* and the *Australian Taxation Office*, that use automated decision-making systems in their administrative processes [11]. This early application of algorithmic tools reflected the

federal government's growing interest in digital transformation and data-driven efficiency. It also marked the initial stage of algorithmic governance within the Australian public administration.

The Australian public sector extensively incorporates technology-assisted decision-making across various administrative and operational contexts, demonstrating a clear trend toward digital transformation and data-based decision-making. Among these, one of the most well-known cases is the implementation of an automated debt recovery system by the Department of Human Services (DHS), known as the Online Compliance Intervention (OCI) program.

This article focuses on the OCI system as a case study to examine how automation challenges the transparency principle in administrative law. OCI was part of the Australian Government's "Improving the Administration of the Benefits System" initiative, which aimed to recover A$2.1 billion in welfare overpayments over four years. Launched in July 2016, the system automatically checks that the income declared by individuals to *Centrelink* (the department within the *Department of Human Services ('DHS')* responsible for social security payments) matches the ATO's records. When a discrepancy was detected—or when a recipient failed to respond within the prescribed time—the system automatically generated a debt notice.

However, the algorithm underlying the OCI system relied on a flawed assumption that an individual's income was evenly distributed across the relevant financial period. While this may be true for full-time employees, it failed to account for the fluctuating income patterns of casual or part-time workers. As a result, many welfare recipients were incorrectly assessed as owing debts they did not actually owe.

In 2017, the *Senate Community Affairs References Committee and the Commonwealth Ombudsman* conducted separate inquiries into the OCI program. Their investigations revealed that the automation process lacked critical procedural safeguards, including opportunities for human review, error correction, and meaningful avenues for appeal. Moreover, citizens were not adequately informed of their rights to contest algorithmic determinations. The Ombudsman's 2017 report further criticised the system for its lack of transparency and accountability. The averaging algorithm and decision-making logic were neither disclosed nor explained to affected individuals, rendering them unable to understand, verify, or challenge the automated outcomes. These problems were highlighted by the *Commonwealth Ombudsman's Investigation Report* released in April 2017 that criticized the lack of fairness and transparency in DHS's decision-making process [12].

This opacity not only undermined administrative fairness but also violated fundamental principles of the rule of law, such as the duty to give reasons, procedural fairness, and reviewability. As noted by Carney (2019), the 'Robo-debt' controversy exemplifies how automation, when detached from human judgment, erodes the guarantees of legality and fairness that underpin the rule of law. The OCI case, therefore, exemplifies how automated decision-making in public governance can erode transparency and weaken citizens' trust in government legitimacy.

4. The Pitfalls of Transparency in Automated Decision-Making Triggers: the Black Box of Algorithms

With the rise of algorithmic technology and the emergence of the technological black box problem, the term algorithmic black box has been used to refer specifically to the opacity of algorithms. *Frank Pasquale*, in *The Black Box Society*, was the first to use the metaphor of the black box of algorithms, arguing that American society is being plunged into an incomprehensible black box society manipulated by secret algorithms in the financial and technological industries, He points out that the values, rules, and privileges encoded in algorithms remain hidden, forming an invisible structure of power that influences decisions while evading public scrutiny. This tension reflects a fundamental dilemma—while algorithmic systems enhance efficiency, they simultaneously obscure accountability [13].

Conceptually, an algorithmic black box is a state of non-disclosure and non-transparency of an algorithmic system from input to output [14]. At its essence, an algorithmic black box is essentially the ignorance of the user of an algorithmic product about the algorithmic system. The "black box" of data is not visible from the inside; people know the inputs and outputs, but not the input-to-output transformation model. The three-layer architecture of interface, data, and model forms a natural algorithmic black box, with the data and model inside the black box and the interaction interface at the boundary of the black box, forming a natural barrier between the physical and digital worlds. According to Bianqin's theory of the "panoramic open prison", the subject of the algorithm stands on the watchtower behind the black box and exercises power over the subject of the law through the black box. While the subject of the law outside the black box cannot control the subject of the algorithm inside the box. The algorithm avoids the supervision of others over itself while supervising others, so that the subject of the algorithm and the subject of universal law form a kind of power in the relationship between the "visible or invisible."

It is widely recognized that neither commercial nor governmental algorithms have escaped the black box of algorithms. Studies have shown that although algorithms are widely used in society, their transparency is limited. Especially in public governance, governments are using automated decision-making systems to replace or assist public administrators in making automated administrative decisions, but the public is unable to observe and understand the logic or decision-making mechanisms within the 'black box', and the trend of black-boxing algorithmic governance is becoming more and more prominent. If the algorithmic black box in the commercial field has a certain rationality due to its private nature in the private sphere, the algorithmic black box in government governance is incompatible with the public nature and openness of the public sphere. Algorithmic black boxes challenge citizens' right to know about

government decisions, affecting the legitimacy of government decisions, and have thus become a major problem in government algorithmic governance that needs to be addressed.

At the same time, disclosure of algorithms is a tricky concept. Exposing algorithms to the light of day not only puts them at risk of being challenged as trade secrets, but also does not make it easier to open the black box of algorithms. As *Gina Burrell* argues, the main reasons for the emergence of algorithmic black boxes and the opacity of algorithms are (1) obfuscation as government, corporate, or other institutional secrets; (2) obfuscation due to the disparity between programming professionalism and general public knowledge; and (3) obfuscation due to the mismatch between the high-dimensional mathematical optimization properties of machine learning and human reasoning and interpretive methods of semantics. Obfuscation due to non-publication of algorithms and the knowledge gap is not the only contributing factor. In other words, even if the source code is published, the algorithms are still not transparent and still cannot be interpreted, as explained in the following section.

5. Extraterritorial Legislation and Multidimensional Regulation of Algorithms

In the global context, the governance of algorithms has evolved beyond domestic regulation, extending into extraterritorial legislative frameworks that reflect the globalized nature of digital governance. Different jurisdictions have developed varied approaches to regulate algorithmic activities, balancing innovation with accountability. Among these, the European Union and the U.S. have established one of the most comprehensive models for algorithmic governance, combining data protection, consumer rights, and AI ethics under a unified regulatory framework.

5.1 Data Empowerment Pathways Represented by the European Union

While algorithmic governance in the EU is primarily driven by public authorities, its regulatory architecture also promotes multi-stakeholder participation, engaging private entities, civil society, and academic organizations. The EU does not yet have a single piece of legislation dedicated solely to algorithms. However, recognizing the pervasive role of algorithms in modern artificial intelligence and digital environments, the EU has developed a network of laws and regulations addressing algorithmic risks in multiple domains, including data protection, artificial intelligence, consumer protection, and the digital marketplace.

Among these frameworks, the *General Data Protection Regulation (GDPR)* plays a pivotal role. It explicitly recognises individuals' "right to explanation" regarding automated decision-making and profiling, mandating that data controllers provide meaningful information about the logic involved, the significance, and the envisaged consequences of such processing. This provision ensures that individuals are not subject to algorithmic decisions that significantly affect them without understanding how those decisions were made.

Beyond the GDPR, the *EU Artificial Intelligence Act (AI Act)* represents another major step toward algorithmic accountability. The AI Act classifies AI systems into different risk categories—unacceptable, high, limited, and minimal—requiring different levels of transparency, human oversight, and documentation for each. High-risk systems, such as those used in recruitment, education, or law enforcement, are required to undergo rigorous conformity assessments before deployment. This risk-based approach demonstrates the EU's proactive stance in addressing potential harms caused by algorithmic opacity.

In addition, the *EU Digital Services Act (DSA)* and *Digital Markets Act (DMA)* further expand algorithmic accountability to large online platforms and gatekeepers. They require these entities to disclose key parameters of recommender systems, ensure traceability of automated content moderation, and prevent discriminatory or manipulative algorithmic practices. Together, the GDPR, AI Act, DSA, and DMA form a multi-dimensional governance framework that addresses algorithmic opacity from different regulatory perspectives.

On the other hand, the EU has focused on developing ethical guidelines for AI. For example, the *Ethics Guidelines for Trustworthy AI*, published by the *European Commission* in 2019, set out seven core principles: human agency and oversight, robustness and safety of technology, privacy and data governance, transparency, diversity, non-discrimination and fairness, social and environmental well-being, and accountability [15]. These principles are intended to provide guidance on the design of AI systems. These principles are intended to guide and regulate the design and application of AI systems to ensure that they are trustworthy, reliable and sustainable.

5.2 Self-Regulation and Judicial Review Paths Represented by the U.S.

In the field of algorithms, the United States emphasizes the complementary roles of government, industry, and academia, forming a model of multi-actor synergy that integrates legislative efforts, industry self-regulation, and ethical norms. Unlike the EU's comprehensive top-down approach, the U.S. adopts a decentralized and flexible governance model, relying more on innovation incentives and soft-law mechanisms.

On the one hand, the U.S. has adopted the approach of 'state governments taking the lead in legislation and the federal government continuing to promote'. State governments in the United States are pioneers in promoting algorithmic governance, especially New York City, which passed the *Algorithm Accountability Act* in 2018, and create a precedent for algorithmic legislative governance in the United States. New York City's *Algorithm Accountability Act* aims to address algorithmic discrimination by regulating all types of algorithms used by the government, and to promote open-source algorithms for government decision-making and create algorithmic accountability. As a result of New

York City's pioneering legislation, the *Algorithm Accountability Act* was introduced in the U.S. Congress in 2019 to promote transparency, fairness, and accountability. Subsequently, Congress introduced the *Algorithm Accountability Act* of 2022, which builds on the act of 2019. Compared to the 2019 version, the 2022 Act not only places greater emphasis on algorithmic transparency, interpretability, fairness, and non-discrimination, but also requires algorithmic companies to report and audit on a regular basis [16].

On the other hand, the US has adopted a 'self-governing industry approach with active participation of academic organizations. As the direct developers and applicators of algorithmic systems, companies are required by society to actively fulfil their algorithmic governance responsibilities. To this end, Microsoft, Google, Facebook, and other technology enterprises have formulated principles of AI ethics. For example, in 2018, Google released seven AI ethical principles, including 'beneficial to society' [17]. Academic organizations also participate in algorithmic governance as a third party. For example, in 2017, the *Institute of Electrical and Electronics Engineers (IEEE)* released the *Ethical Guidelines for the Design of Artificial Intelligence*, which puts forward five basic principles, including 'human rights, well-being, accountability, transparency, and prudent use [18].

In sum, the U.S. approach to algorithmic regulation embodies a pluralistic and adaptive system: rather than rigid legal control, it fosters an ecosystem of co-regulation in which laws, ethics, and industry standards interact. However, the absence of a unified federal framework means enforcement remains uneven, and the balance between innovation and accountability continues to be contested.

6. Another Possibility to Realize the Algorithm Transparency: Explainable Artificial Intelligence by Government

The right to algorithmic interpretation, as an expression of the principle of algorithmic transparency, represents one of the most significant achievements in the evolution of algorithmic governance. It requires that automated decision-making systems be explainable in a way that allows affected individuals to understand and challenge the outcomes. The EU was the first to require that individuals be granted the right to algorithmic interpretation through the *General Data Protection Regulation (GDPR)*. The GDPR regulates automated decision-making in Articles 13, 14, 15, and 22. GDPR's *Articles 13 to 15* requires algorithmic controllers to provide 'meaningful information about the processing of the data'. Specifically, *Article 22*mandates that algorithmic controllers protect the rights and freedoms of data subjects when conducting automated analysis, thereby linking the realization of this right directly to algorithmic interpretability [19].

Explainable Artificial Intelligence (XAI) provides a transparent and understandable representation of how decisions are made, as opposed to complex black-box algorithms. Users and stakeholders need this openness in order to understand, verify and be held accountable for the decisions made by these algorithms. By transforming opaque algorithms into interpretable frameworks, XAI enables users, regulators, and stakeholders to verify, contest, and hold accountable the results generated by automated systems. As FAT stating, the goal of explainable AI is to ensure that automated decision-making can be explained to end-users and other stakeholders in non-technical terms [20]. Moreover, interpretation promotes fairness in the results of algorithms, making it easier to detect and reduce bias [21].

In this regard, David Gunning understands explainable AI as the creation of a set of machine learning techniques that enable human users to understand, appropriately trust, and effectively manage a new generation of AI [22]. This suggests that explainable AI exists as a user-directed explanatory technology. It also suggests that explanations must be presented in comprehensible terms to be understood by humans. This is the goal of explainable AI as a user-directed explanatory technology.

In Australia, both the *Administrative Decisions (Judicial Review) Act 1977* (Cth) (*'ADJR Act'*) and the *Administrative Appeals Tribunal Act 1995* (Cth) (*'AAT Act'*) stipulate that decision-makers are required to provide a detailed written statement when requested. This statement must outline the findings on crucial factual questions, reference the evidence or other materials that these findings were based on, and articulate the reasons behind the decision [23]. The *Administrative Review Council* has published guidelines explaining that simply listing evidence and stating a decision is not sufficient. According to Groves, a statement of reasons should also clarify how the decision was reached by explaining the reasoning process used [24]. As seen in the case of *Campbelltown City Council v Vegan*, when several conclusions are possible, it is necessary to explain why one conclusion was favored over the others [25]. Embedding XAI principles within this framework could therefore modernize administrative accountability, ensuring that algorithm-assisted decisions are subject to the same standards of reasoning, justification, and transparency as traditional human decisions.

7. Conclusion

The rise of algorithmic governance marks a profound transformation in administrative decision-making. While algorithms have enhanced efficiency and objectivity, their opaque nature poses significant challenges to transparency, accountability, and public trust. The "black box" phenomenon of automated systems reveals not only technical opacity but also structural imbalances of power between algorithmic institutions and citizens. Without adequate mechanisms for explanation and oversight, algorithmic decisions risk undermining the procedural fairness and legitimacy that are foundational to the rule of law.

From a comparative perspective, the European Union, the United States, and Australia represent three distinct yet complementary approaches to managing these challenges. The EU has built a comprehensive and multi-layered framework—combining legal, ethical, and technical governance—to ensure algorithmic accountability through instruments such as the GDPR, AI Act, and Ethics Guidelines for Trustworthy AI. The United States, by contrast, favors a decentralized model emphasizing industry self-regulation and ethical co-governance, which fosters innovation but leaves oversight uneven. Australia, meanwhile, provides a pragmatic example of how traditional administrative law—through written reasons and judicial review—can adapt to the algorithmic era by integrating Explainable Artificial Intelligence (XAI) principles.

Explainable Artificial Intelligence (XAI) thus provides a normative and technical bridge between human reasoning and algorithmic logic. It operationalizes transparency by translating complex computational decisions into forms understandable to humans, ensuring that algorithmic outputs can be reviewed, justified, and contested in the same manner as human decisions. Embedding XAI into public administration would not only strengthen the rule of law but also restore citizens' confidence in algorithm-assisted governance by reaffirming the values of fairness, accountability, and transparency.

Ultimately, achieving genuine algorithmic transparency requires a multi-dimensional effort that integrates law, ethics, and technology. Legislative guarantees of interpretability, ethical standards for fairness, and the deployment of XAI tools together form a sustainable governance model. Only through such integration can governments ensure that the benefits of automation are realized without compromising the principles of justice and accountability that underpin democratic governance.

References

[1] Makoto Cheng Hong and Choon Kuen Hui, 'Towards a Digital Government: Reflections on Automated Decision-Making and the Principles of Administrative Justice' (2019) 31(2) Singapore Academy of Law Journal 875.

[2] Administrative Review Council, Automated Assistance in Administrative Decision Making: Report to the Attorney-General (Report No 46, November 2004) 3.

[3] Robert French, 'Rationality and Reason in Administrative Law: Would a Roll of the Dice be Just as Good?' (Annual Lecture, Australian Academy of Law, 29 November 2017).

[4] Daniel Faggella, "7 Chatbot Use Cases That Actually Work" Emerj Artificial Intelligence Research (14 December 2018).

[5] Treasury Board of Canada Secretariat, "Responsible Artificial Intelligence in the Government of Canada" Digital Disruption White Paper Series (10 April 2018) 17.

[6] Ibid 879.

[7] Terry Carney, 'Robo-Debt Illegality: The Seven Veils of Failed Guarantees of the Rule of Law?' (2019) 44(1) Alternative Law Journal 4.

[8] Martin H. Redish and Lawrence C. Marshall, 'Adjudicator, Independence, and the Values of Procedural Due Process' (1986) 95 Yale Law Journal 455, 478-489.

[9] B. Z. Tamanaha, On the Rule of Law: History, Politics, Theory (Cambridge: Cambridge University Press, 2004) 2.

[10] C. Coglianese and D. Lehr, 'Regulating by Robot: Administrative Decision Making in the Machine-Learning Era' (2017) 105 Georgetown Law Journal 1147.

[11] Administrative Council, 'Automated Assistance in Administrative Decision Making' (Issues Paper, 2003) 11–15.

[12] Commonwealth Ombudsman, Centrelink's Automated Debt Raising and Recovery System: A Report about the Department of Human Services' Online Compliance Intervention System for Debt Raisingand Recovery (Report No 2/2017, April 2017) at paras 3.14 and 3.15.

[13] Pasquale, F., The Black Box Society: The Secret Algorithms That Control Money and Information (Harvard University Press, 2015) 1-8.

[14] Burrell, J., 'How the Machine "Thinks": Understanding Opacity in Machine Learning Algorithms' (2015) 3(1) Big Data & Society 1-12.

[15] European Commission, Ethics Guidelines for Trustworthy AI, European Commission(8 April 2019), https://digital-strategy.ec.europa.eu/en/library/ethics-guidelines-trustworthy-ai.

[16] H.R.6580--Algorithmic Accountability Act of 2022, Congress.gov(3 February 2022), https://www.congress.gov/bill/117th-congress/house-bill/6580/text.

[17] Sundar Pichai, AI at Google: Our Principles, Google(7 June 2018), https://blog.google/techno-logy/ai/ai-principles.

[18] IEEE Standards Association, Ethically Aligned Design, IEEE(12 November 2017), https://standards.ieee.org/content/dam/ieee-standards/standards/web/documents/other/ead_v2.pdf.

[19] Andrew D Selbst, Julia Powles, 'Meaningful Information and the Right to Explanation' (2017) 7(4) International Data Privacy Law 237.

[20] The FAT-ML Workshop Series on Fairness, Accountability, and Transparency in Machine Learning, FATML (6 June 2018)< http://www.fatml.org/>.

[21] Jambi Ratna Raja Kumar et al, 'Transparency in Algorithmic Decision-Making: Interpretable Models for Ethical Accountability', ed G Li, U Subramaniam and M Sekar (2024) 491 E3S Web of Conferences.

[22] David Gunning and David W.Aha, 'DARPA's Explainable Artificial Intelligence (XAI) Program' (2019) 40(2) AI Magazine 45.

[23] ADJR Act s 13(1); AAT Act s 28(1).

[24] Matthew Groves, 'Reviewing Reasons for Administrative Decisions: Wingfoot Australia Partners Pty Ltd v Kocak' (2013) 35(3) Sydney Law Review 627, 630.

[25] (2006) 67 NSWLR 372, 397 [121] (Basten JA).