

An Comhchoiste um Intleacht Shaorga

An chéad tuarascáil eatramhach

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Joint Committee on Artificial Intelligence

First interim Report

December 2025

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Related information

Publications, videos, transcripts of debates, and contact details for the Committee Joint Committee on AI can be found here.

The orders of reference for the Committee can be found here.

Foreword

The Joint Committee on Artificial Intelligence was established to examine and make recommendations on Ireland's approach to the development, deployment, regulation, and ethical considerations of artificial intelligence (AI), and on the means of ensuring that the approach supports economic growth, innovation, public trust, and societal benefit while safeguarding rights and mitigating risks.

This is the first report of the Committee and reflects the work done over its first seven meetings. The Committee will continue to publish interim reports along with a final report at the conclusion of its work.

We are very grateful to the witnesses the national and international experts who engaged with the Committee and shared their knowledge and experience to date. We look forward to exploring a variety of themes in the coming months and engaging with a wide range of people and groups.

Artificial Intelligence is an exciting and challenging developing technology. The Committee is working in a collaborative way to consider the potential benefits and risks associated with it and to explore how Ireland can lead in this space. We do not believe that regulation and innovation are mutually exclusive, and we are looking to strike the right balance.

The Joint Committee on Artificial Intelligence hopes that the issues raised in this report can be the subject of a debate in both Houses of the Oireachtas.

Malcolm Byrne TD

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Cathaoirleach

Introduction, witnesses and transcripts

Artificial intelligence is defined in the EU AI Act as follows:

AI system' means a machine-based system that is designed to operate with varying levels of autonomy, that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments.

Artificial intelligence is defined by the OECD as follows:

An AI system is a machine-based system that, for explicit or implicit objectives, infers from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

Different AI systems vary in their levels of autonomy and adaptiveness after deployment.

The Committee held its first public meeting on 10 June 2025 and has 24 calendar months to carry out its work. The Committee decided to undertake its work in a modular way and hopes to publish regular reports with key findings and recommendations stemming from its work.

But first, as its initial module - Introduction to AI - the Committee decided to hear from several experts, along with representatives, to consider what AI is, how it works, and how it might impact public and private bodies as well as individuals and communities.

During the first public session, contemplating which key concerns to focus on, Dr Ciarán Seoighe told the Committee:

"One of the greatest risks is that nobody can agree at that level quite what we are facing in terms of risks. There is no scientific consensus in the community on what exactly AI is: there are those who believe AI is the best thing ever, and there are those who believe it is the end of mankind."

The seven meetings held for this module were as follows:

Full transcripts are available at the links.

10 June – Taighde Éireann – Research Ireland

<u>24 June</u> – AI Advisory Council

8 July - Minister of State Niamh Smyth

23 September – Children and Young People, with:

National Youth Council of Ireland, Ombudsman for Children's Office Youth Advisory Panel, Irish Society for the Prevention of Cruelty to Children, Irish Traveller Movement, Children's Rights Alliance, National Parents Council, BeLong To, CyberSafeKids, Spunout and Webwise.

30 September - Older People, with:

Age Action, ALONE and the Irish Senior Citizens Parliament.

7 October - Disability (i), with:

Disability Federation of Ireland, National Disability Authority and Voice of Vision Impairment.

4 November - Disability (ii), with:

Disabled Persons' Organisations Network

Section one of this report contains the full list of the Committee's recommendations at this point. These stem from the first seven meetings it held, which form the basis for this report. Section two explores some initial observations from the Committee and adds some narrative or context to the recommendations made.

The Committee is mindful that developments in AI are happening rapidly and some issues will need to be revisited or covered in more detail.

1. RECOMMENDATIONS

- 1. The Joint Committee on Artificial Intelligence should be established on a permanent basis to provide ongoing oversight and guidance on AI policy and regulation.
- The Government should establish a Citizens' Assembly on Artificial Intelligence
 Digitalisation and Technology to facilitate inclusive public dialogue and democratic
 input on AI policy and ethics.
- 3. An immediate, coordinated, all of government approach to AI is required. This should be led by the national AI Office, to be up and running by August 2026.
- 4. The national AI Office should have the necessary levels of independence, technical experts and resourcing to ensure that there are no conflicts between the State's supports for industry to harness AI, the State's own deployment of AI, and the design, implementation and enforcement of regulations to govern AI, and to support other AI regulators and fundamental rights bodies.
- 5. The national AI Office should have well-resourced advisory panels in place for routinely collaborating with young people, older people and disabled people and including representation from those groups and also civil society groups who can provide routine expertise and insights into AI harms and benefits.
- 6. Develop a national AI risk register within the national AI office to identify and monitor systemic risks across sectors.
- 7. The nine authorities designated to safeguard fundamental rights under the EU AI Act should be provided with dedicated, ring-fenced and multi-annual resourcing to reflect their new responsibilities in relation to AI. Additional funding should be provided to ensure they have the human, technical and financial resources required to carry out their functions.
- 8. The AI Summit, planned as part of Ireland's EU presidency and due to held in October 2026, should engage a wide variety of stakeholders and position Ireland as a leader in the debate globally on AI adoption, governance, and ethics. There should be a specific focus on upskilling and reskilling for the AI age.

- The AI Advisory Council, which currently operates on a voluntary basis, should be
 put on a permanent footing, provided with State funding and be broadly
 representative of society.
- 10. An AI Observatory should be established to complement the National AI Office and track real-time issues and project future impacts on jobs and skills to provide independent forecasting and policy advice.
- 11. Ireland must not shy away from the EU AI Act or try to dilute it. We should treat it as a minimum baseline for national AI regulation, not a maximum standard.
- 12. Implementation and proper resourcing of existing regulations and strategies, such as the EU AI Act, the Digital Services Act, the Data Protection Acts and the online safety codes, is essential. This should include additional training and resources for the competent authorities designated under the AI Act.
- 13. Existing laws such as the GDPR and copyright law should continue to apply to AI, with GDPR principles being applied, including rights of access, rectification, erasure, and effective redress mechanisms for individuals.
- 14. The EU Copyright Directive needs to be strengthened to ensure that content cannot be used to train AI models without the consent of its creators.
- 15. Harmful and hateful content pushed by recommender systems that use AI needs to be better addressed in the EU AI Act any codes that stem from it.
- 16. Recommender systems should be switched off by default and social media companies should be banned from turning on recommender algorithms for accounts used by children.
- 17. Include obligations on platform owners to prevent the use of AI-driven recommender systems for misinformation campaigns aimed at destabilising society.
- 18. Introduce mandatory algorithmic impact assessments for high-risk AI systems in public services.
- 19. A scheme for regulatory sandboxes should be established by August, 2026 so that companies and organisations can safely develop AI products to improve operations
- 20. Approved terms of reference must be established for any advisory bodies placed on a paid and permanent footing, ensuring clarity of mandate and accountability.

- 21. Just because something can be done using AI doesn't mean it should be; it is a tool and discussions and decisions in relation to AI should be rooted in human rights and equality considerations and should reflect the values we want enshrined on our society. The precautionary principle should be applied.
- 22. Robust, well-implemented regulation of AI is essential and should be done alongside support for and collaboration with businesses, where appropriate.
- 23. Information for the public on digital literacy and AI, critical thinking, their rights, consent, profiling, bias, scams and bad actors, AI and its potential harms and benefits, how to have a voice in terms of public policy around AI, how to engage in or opt out of AI on their devices, how to ensure their digital rights are being respected and that they can access information on how AI systems are being used in public service bodies.
- 24. This should be provided through the likes of awareness campaigns, the education system, community organisations, learning and upskilling opportunities, and so on, in an equitable way, that is suitable to the varied needs and abilities of different people.
- 25. Information for operators in terms of what the legal requirements are, to include effective implementation and communication around regulations, regulatory sandboxes and additional supports for SMEs.
- 26. Invest in AI literacy programs for policymakers and public servants to ensure informed decision making and responsible AI technologies.
- 27. While education on AI is important, it should not come at the expense of softer skills and people skills such as strategising, critical thinking, communication and emotional intelligence because they are just as important as the hard skills in order to use this technology to maximum advantage in an ethical and responsible way.
- 28. There should be a coordinated national effort across education, from primary school to workplace, to support AI literacy, ensuring that teachers and workers understand the opportunities and limitations of AI tools, and that access to these tools is equitable.

- 29. The Committee regards the legal obligation for AI bots to be clearly identifiable to users and for operators to have to provide transparent notifications regarding data storage, ownership, and sharing practice as very important.
- 30. The State should take action to mitigate against an overreliance on the private sector on foot of AI.
- 31. The State should explore publicly owned AI resources and technologies.
- 32. A national conversation on AI and mechanisms for the public to have an input on how this evolving technology is adopted in Irish society is a must.
- 33. Establish pathways and mechanisms to ensure underprivileged communities and marginalised groups are involved in the design and assessment of AI-powered tools and systems.
- 34. Guarantee that AI-systems or tools do not filter out voices from underprivileged communities or marginalised groups. Participation with civil society groups must be prioritised to ensure that language models used in machine learning processes recognise different dialects and input from different communities.
- 35. Information must be made available regarding an individual's rights concerning data, how and when data is used in AI, and how it can be removed or changed. This information must be available in a manner and in various formats that can be understood and accessed by all individuals.
- 36. Good practices and principles that make AI adoption and regulation equitable and inclusive are a must.
- 37. Equality by design should be a core element through all phases of developing an AI product or solution.
- 38. Thorough research and testing, keeping humans in the loop and unbiased training data should be mandatory to avoid biases and bad outcomes from AI.
- 39. Companies or public sector bodies that deploy biased or discriminatory AI systems should be regarded as in breach of equality and non-discrimination laws and should be actively pursued and prosecuted by state agencies as well as liable to individual litigation.

- 40. A key focus for Government in developing policies around AI must be how to avoid deepening existing inequalities or worsening the digital divide.
- 41. Tailored supports for underprivileged communities and marginalised groups need to be a core element of national AI strategies.
- 42. Issues around energy in Ireland need to be resolved, with plentiful sustainable and renewable energy being made available as an urgent priority. AI use and development must take account of the state's international obligations to reduce Ireland's overall energy use under EU Energy Efficiency Directive and our obligations under the Climate Act.
- 43. An energy council comprised of full-time paid employees should be established to resolve current issues around energy and plan for future needs and projects.
- 44. Solutions to make hardware, software and processes around AI more environmentally friendly must be found.
- 45. Accountability, traceability, transparency and explainability must be embedded in AI in Ireland.
- 46. Where AI systems are used for decision-making, they need to be transparent, auditable and able to show proof of non-discrimination on the nine grounds set out in Irish equality law.
- 47. Those bodies with regulatory functions with regard to AI must conduct audits of AI enabled platforms to ensure compliance with the law. Those bodies must be adequately skilled and resourced to do this.
- 48. All public bodies and semi-state entities using AI in public services must publish annual evidence-based reports detailing benefits, disadvantages, and any inequalities identified. These reports should be made publicly accessible to ensure transparency and accountability.
- 49. Accountability and transparency in the public procurement process is a key concern.
- 50. The Department of Public Expenditure and Reform's 'Guidelines for the Responsible

 Use of AI in the Public Service' should be amended to include a reference to the

 Public Sector Human Rights and Equality Duty. The Duty should be the core

- framework guiding public bodies in their adoption of AI, ensuring that systems are rights-compliant from the start.
- 51. Any AI-powered tools or systems being considered for use by Government

 Departments or State bodies must follow a procurement process and undergo risk

 assessment and bias testing, before deployment.
- 52. A clear, auditable line of investigation should be established to ensure that regulators have access to vital information.
- 53. A publicly accessible central register for all algorithmic systems used by the Government and public bodies should be made mandatory. Information relating to public sector use of AI-powered tools and systems should be provided with details relating to the developer, deployer and vendor of AI-systems, procurement costs, the performance metrics used and any findings of assessments carried out prior to deployment.
- 54. The Courts should be resourced to have the expertise necessary to determine and deliberate on defects within AI systems.
- 55. Recognising the operational challenges, the State should consider ways to monitor and report AI products developed in other jurisdictions that have been shown to have human rights breaches.
- 56. The Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation should provide clear guidelines, not only on the use but also on the procurement of AI systems and services.
- 57. Policies and practices should be put in place to ensure that there is an incentive and obligation in the corporate sector to protect and include minorities.
- 58. It is imperative that policy makers act now to ensure young people's protection online, including from harms associated with AI.
- 59. Children and young people's rights and wishes must be central in AI discussion, design, policies, strategies and legislation.
- 60. Additional funding for youth work should be provided to enable comprehensive work around issues relating to AI in those forums.

- 61. Operators must be legally required to ensure that any product, platform or system includes safety by design for children and does not infringe upon their rights.
- 62. Operators and tech companies must be legally obliged to ensure that any product, platform or system includes safety by design for children and does not infringe upon their rights.
- 63. Recommender systems should be designed so that recommended material that is put out delivers a balanced point of view, that is evidence based.
- 64. The EU AI Act, UNICEF AI guidance, and the UNCRC should form the minimum baseline for protection, with scope for additional safeguards as needed.
- 65. Mechanisms should be available for children to input on how they want their rights and values reflected in technology developments and remedies and complaints mechanisms provided for when infringements of rights occur.
- 66. UNICEF AI guidance and the UNCRC should inform Irelands response to AI and child safeguarding.
- 67. Older people, their families and those who provide care for them, should be collaborated with throughout AI product development, including in datasets, product design and testing and roll-out.
- 68. AI should complement, not replace, human contact, with human support options for services being a legal requirement.
- 69. Further funding should be allocated to organisations working to support older people in light of recent technological developments.
- 70. More funding and grants and community resources should be made available to enable older people to engage with newer technology, as the €2.50 a week telephone allowance is now insufficient.
- 71. Digital for Care, the HSE data ecosystem roadmap and the Health Information Bill 2024 should be progressed, and their implementation should take account of developments in AI and the issues outlined in this report.
- 72. All users should easily be able to turn features on and off and decide who has access to their data.
- 73. Plain English communication is required from operators.

- 74. Where AI systems are introduced in public services, human support options should remain available for individuals or groups who cannot or choose not to engage with AI technology.
- 75. How AI may help or hinder, in terms of disability, and addressing the bias prior to deployment of AI tools or services, should be a top priority within this new policy area.
- 76. The aids and appliances grant and the home adaptation grant should be increased and expanded to include newer technologies that disabled people can benefit from, or alternatively, an additional new non means tested grant should be established to enable access to technology.
- 77. Secure offline tools should be developed for disabled people, including people who use text to artificial speech conversion tools so that their privacy, data and identity information is better protected.
- 78. Deaf people should be central in the design, development and deployment of sign language AI technologies and should be supported to engage in national and EU-level frameworks that support their linguistic autonomy.
- 79. The GovTech Delivery Board and AI Advisory Council should have a dedicated role for or membership of civil society organisations, such as DPOs, Human Rights

 Advocates and people representing marginalised groups and communities'
- 80. The National AI office should have a dedicated role for, or a board with members from DPOs and disability organisations to ensure that the benefits and risks posed by AI on people with disabilities are at the forefront of any policy decisions, particularly the development of AI ethical regulations.
- 81. Additional funding should be provided to DPOs and disability organisations to build further capacity and improve digital literacy amongst disabled people so they can continue to play an important role in helping Ireland meet its obligations around disability under the UNCPRPD, EU AI Act and public sector duty in light of the new challenges AI presents.

- 82. Resources should be provided to DPOs, and disability organisations and disabled people to ensure they can continue to provide expertise and to collaborate with Government Departments, State agencies and other bodies.
- 83. Guided by the blueprint set out by the DPO network, where Government

 Departments or State bodies are considering the deployment of AI, pathways and
 mechanisms should be established to ensure disabled people are involved in the
 design and assessment of those services.
- 84. There must be equitable access to AI-powered tools that can benefit disabled people, or address education, literacy and digital gaps, including for those in prison or other congregated settings.
- 85. To increase input from people with disabilities, a feedback loop or mechanism should be established by the AI Office so that we can better understand how users are interacting with AI and the difficulties they experience.

2. Initial observations

2.1 Regulation and the National AI Office

While the Committee will assess the need for further legislation down the line, it is clear from its initial deliberations that the robust and effective implementation of existing regulations associated with AI is an essential starting point. This should be an immediate, coordinated, all of government effort because realising the benefits and mitigating the harms that come with AI requires inputs that span several Departments and agencies. These are two contributions made by Dr Patricia Scanlon, Ireland's AI Ambassador, and Chair of the AI Advisory Council, that summarise the task at hand well:

"All of this is not just about attracting business. The Government must ensure AI delivers real benefits for society, protecting creative industries and intellectual property. We cannot build systems that drive growth but ultimately deepen inequality, erode privacy or undermine dignity. Privacy, fairness, transparency and accountability serve the common good. The Government needs to lead by example,

integrating AI into public services effectively, responsibly, transparently and accountably. This will build public confidence and show Ireland can harness AI safely and ethically."

"In our implementation, we must not shy away from the EU AI Act and not try to dilute it, which there will be a lot of pressure from commercial interests to do, in order for them to able to innovate and not regulate. We must stand firm on it. When AI will make a decision that will influence somebody's life, in a system that is not regulated well, bias can creep into decision-making and further increase inequalities. People in certain areas will not get a loan or somebody with an accent will not be understood."

The Committee welcomes Minister of State, Deputy Niamh Smyth's commitment to have a national AI Office functioning by August in 2026 to enable this work. The national AI Office will be Ireland's single point of contact under Article 70 of the EU AI Act. The State has informed the European Commission that this Office will be within the Department of Enterprise, Tourism and Employment. The Committee heard concerns from witnesses regarding the independence of the National AI Office, with ICCL telling members that the Committee:

"...should press for an independent national AI Office with a dedicated budget and Commissioner, with an adequate number of technical experts employed to support itself, other AI regulators and the fundamental rights bodies. Like the DPC, it should not be housed within any of the government departments."

This Office should support existing regulators in ensuring the safe and effective deployment of AI systems and will also have a role in supporting government, businesses, civic society and others in understanding and adopting AI systems where appropriate.

¹ Although the meeting of 21 October 2025 was part of the Committee's AI & the State module, and it is intended that a separate report will follow on that topic in the future, it is mentioned in this report as well, as member(s) drew on it in the formulation of this report.

The Committee shares Minister Smyth's hope that a regulatory sandbox can be established by August 2026 as well, to support and assist companies in adhering to the regulations. Witnesses emphasised that the sandbox will need to be well resourced. Some suggestions mentioned in relation to the sandbox included the potential to join with another EU Member State to set one up and to give SMEs priority access within that.

Copyright was discussed as a regulation gap. While the Committee intends to hold a module on the creative industries in future, for now it recommends that the EU copyright directive is amended to ensure creators are protected in an equitable way with regard to how their outputs are being used.

Another regulation gap discussed was harmful and hateful content pushed by recommender systems that use AI. This is of serious concern to the Committee and must be addressed in any EU and national legislation. This is discussed further in the section on Young People.

- 1. The Joint Committee on Artificial Intelligence should be established on a permanent basis to provide ongoing oversight and guidance on AI policy and regulation.
- 2. The Government should establish a Citizens' Assembly on Artificial Intelligence
 Digitalisation and Technology to facilitate inclusive public dialogue and democratic
 input on AI policy and ethics.
- 3. An immediate, coordinated, all of government approach to AI is required. This should be led by the national AI Office, to be up and running by August 2026.
- 4. The national AI Office should have the necessary levels of independence, technical experts and resourcing to ensure that there are no conflicts between the State's supports for industry to harness AI, the State's own deployment of AI, and the design, implementation and enforcement of regulations to govern AI, and to support other AI regulators and fundamental rights bodies.

- 5. The national AI Office should have well-resourced advisory panels in place for routinely collaborating with young people, older people and disabled people and including representation from those groups and also civil society groups who can provide routine expertise and insights into AI harms and benefits.
- 6. Develop a national AI risk register within the national AI office to identify and monitor systemic risks across sectors.
- 7. The nine authorities designated to safeguard fundamental rights under the EU AI Act should be provided with dedicated, ring-fenced and multi-annual resourcing to reflect their new responsibilities in relation to AI. Additional funding should be provided to ensure they have the human, technical and financial resources required to carry out their functions.
- 8. The AI Summit, planned as part of Ireland's EU presidency and due to held in October 2026, should engage a wide variety of stakeholders and position Ireland as a leader in the debate globally on AI adoption, governance, and ethics. There should be a specific focus on upskilling and reskilling for the AI age.
- The AI Advisory Council, which currently operates on a voluntary basis, should be
 put on a permanent footing, provided with State funding and be broadly
 representative of society.
- 10. An AI Observatory should be established to complement the National AI Office and track real-time issues and project future impacts on jobs and skills to provide independent forecasting and policy advice.
- 11. Ireland must not shy away from the EU AI Act or try to dilute it. We should treat it as a minimum baseline for national AI regulation, not a maximum standard.
- 12. Implementation and proper resourcing of existing regulations and strategies, such as the EU AI Act, the Digital Services Act, the Data Protection Acts and the online safety codes, is essential. This should include additional training and resources for the competent authorities designated under the AI Act.
- 13. Existing laws such as the GDPR and copyright law should continue to apply to AI, with GDPR principles being applied, including rights of access, rectification, erasure, and effective redress mechanisms for individuals.

- 14. The EU Copyright Directive needs to be strengthened to ensure that content cannot be used to train AI models without the consent of its creators.
- 15. Harmful and hateful content pushed by recommender systems that use AI needs to be better addressed in the EU AI Act any codes that stem from it.
- 16. Recommender systems should be switched off by default and social media companies should be banned from turning on recommender algorithms for accounts used by children.
- 17. Include obligations on platform owners to prevent the use of AI-driven recommender systems for misinformation campaigns aimed at destabilising society.
- 18. Introduce mandatory algorithmic impact assessments for high-risk AI systems in public services.
- 19. A scheme for regulatory sandboxes should be established by August 2026 so that companies and organisations can safely develop AI products to improve operations
- 20. Approved terms of reference must be established for any advisory bodies placed on a paid and permanent footing, ensuring clarity of mandate and accountability.

2.2 AI as a tool we can shape

The situation with AI is much more nuanced than some of the discourse around it would suggest. AI is here, so opting out is not a feasible or sensible option however, there is a window to shape this transformation, and the decisions we make in the coming months will be critical.

Many witnesses stressed that:

- Evidence-based thinking about uncertain outcomes is required to prepare for both anticipated scenarios and unexpected possibilities.
- We are not powerless in the face of rapid developments in AI.
- If the right decisions are taken, the potential benefits AI offers are significant.
- Policymakers have a responsibility and the power to ensure that AI is a force for good.

Without proactive and robust regulation, the market will dictate developments in AI
without enough regard to society or the public good. This could have far-reaching
and detrimental impacts across society.

AI adoption across the board is not recommended or inevitable either. Careful analysis of its suitability for a particular function must be undertaken at the outset. Just because something can be done using AI doesn't mean it should be. It is a tool. Discussions and decisions in relation to AI should be rooted in human rights and equality considerations and should reflect the values we want enshrined on our society.

Recommendation:

21. Just because something can be done using AI doesn't mean it should be; it is a tool and discussions and decisions in relation to AI should be rooted in human rights and equality considerations and should reflect the values we want enshrined on our society. The precautionary principle should be applied.

2.3 Innovation and regulation can coexist

The framing of AI in terms of regulation versus innovation is misplaced. The two can coexist. In, fact, good regulation is actually preferred by innovators, companies or developers in many instances, as it provides clarity and guardrails on how to operate.

On this, ICCL told the Committee:

"the false dichotomy of innovation vs. regulation serves the vested interests of billionaires and is a political decision. Driving forward innovation that protects the rights of the more than five million people in Ireland is also a political decision, and one that this Oireachtas should make for the good of the people."

The introduction of GDPR regulation on the use of personal data illustrates this. Clear and effective implementation of regulations around GDPR did not scare off investment or harm

society. It provided clarity for operators and benefits for people. On this, Research Ireland-Taighde Éireann told the Committee:

"One of the things we can learn from the GDPR regulations that apply to Europe is that if an organisation, an entity or a company from outside Europe wants to sell in Europe, it will have to conform to those regulations. ... The bar set by the GDPR has been adopted by other companies and jurisdictions because they do not want to have two products. Who wants to have ChatGPT Europe and ChatGPT for the rest of the world? It is too much of an overhead cost for companies to do it. The experience from the GDPR is that they will raise their standards to that bar. I hope and think the expectation with the EU's AI Act is that companies would conform to it, not just to be able to sell a product and deliver it in Europe but to do so globally because that makes it easier to manage."

While the Committee discussed the importance of healthy competition and how it might drive innovation, one witness stressed the 'risks of inaction,' which might include hindering innovation and weakening competitiveness, losing investment and talent.

Healthy competition to provide consumers with more ethically run or produced products could be a positive as AI continues to develop. The Committee heard that more environmentally sustainable AI could have appeal in this way, for example.² There can and should be robust, well-implemented regulation of AI, alongside support for and collaboration with businesses, where appropriate.

Recommendation:

22. Robust, well-implemented regulation of AI is essential and should be done alongside support for and collaboration with businesses, where appropriate.

² Meeting of 10 June 2025. Professor Alan Smeaton appearing with Research Ireland - Taighde Éireann said "my model is bigger than your model" will eventually turn into "my model is better". It will even turn into "my model is more ecologically friendly than your model" and "my model uses less electricity and energy consumption than your model."

2.4 Information, awareness and capacity building

The Committee's meetings highlighted that a key safeguard in preventing harms and making gains from AI is information awareness and training.

That includes:

Information for the public on digital literacy and AI, critical thinking, their rights, consent, profiling, bias, scams and bad actors, AI and its potential harms and benefits, how to have a voice in terms of public policy around AI, how to engage in or opt out of AI on their devices, how to ensure their digital rights are being respected and that they can access information on how AI systems are being used in public service bodies.

This should be provided through the likes of awareness campaigns, the education system, community organisations, learning and upskilling opportunities, and so on, in an equitable way, that is suitable to the varied needs and abilities of different people.

Information for operators in terms of what the legal requirements are, to include effective implementation and communication around regulations, regulatory sandboxes and additional supports for SMEs.

Finland was cited often during the Committee's meetings as a good example of a nationwide education campaign on AI. Finland's experience may provide a good starting point as the State looks to get undertake this sizable exercise in information provision.

Witnesses emphasised that while education on AI is important, it should not come at the expense of softer skills and people skills such as strategising, critical thinking, communication and emotional intelligence because they are just as important as the hard skills in order to use this technology to maximum advantage in an ethical and responsible way. Finland started teaching its citizens about media literacy in the 1970s and media literacy and critical thinking skills have been ingrained in Finnish schools.³

The Committee heard many examples of excellent work being done to build AI information, awareness and capacity among people in Ireland, such as the National Youth Council of

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³ How Finnish youth learn to spot disinformation

Ireland (NYCI), Dublin City University (DCU) and the Office of the Ombudsman for Children Ireland undertaking youth empowerment work on AI with the support of Taighde Éireann - Research Ireland. Another example is ADAPT in partnership with TU Dublin providing a dedicated AI literacy campaign for older adults. This kind of work needs to be expanded to include the public at large.

- 23. Information for the public on digital literacy and AI, critical thinking, their rights, consent, profiling, bias, scams and bad actors, AI and its potential harms and benefits, how to have a voice in terms of public policy around AI, how to engage in or opt out of AI on their devices, how to ensure their digital rights are being respected and that they can access information on how AI systems are being used in public service bodies.
- 24. This should be provided through the likes of awareness campaigns, the education system, community organisations, learning and upskilling opportunities, and so on, in an equitable way, that is suitable to the varied needs and abilities of different people.
- 25. Information for operators in terms of what the legal requirements are, to include effective implementation and communication around regulations, regulatory sandboxes and additional supports for SMEs.
- 26. Invest in AI literacy programs for policymakers and public servants to ensure informed decision making and responsible AI technologies.
- 27. While education on AI is important, it should not come at the expense of softer skills and people skills such as strategising, critical thinking, communication and emotional intelligence because they are just as important as the hard skills in order to use this technology to maximum advantage in an ethical and responsible way.
- 28. There should be a coordinated national effort across education, from primary school to workplace, to support AI literacy, ensuring that teachers and workers understand the opportunities and limitations of AI tools, and that access to these tools is equitable.

29. The Committee regards the legal obligation for AI bots to be clearly identifiable to users and for operators to have to provide transparent notifications regarding data storage, ownership, and sharing practice as very important.

2.5 Making 'good' AI

The public good

While business is a key part of the picture as Ireland seeks economic AI opportunities, witnesses did discuss the need to mitigate against over-reliance on the private sector and to protect the public good. Members raised concerns around AI development and private companies dominating the creation of AI and questioned the role of regulation in this regard.

It was remarked more than once that 'if you are not paying for the product, you are the product', and that some companies and platforms have such a monopoly that people are sometimes very much tied to using them, whether they like it or not. One witness positioned the "dominance of big tech" as a crucial issue.

Some Committee Members raised concerns about an imbalance in the current approach to AI in favour of the economy, and with the decision to place the National AI office under the Department of Enterprise, Tourism and Employment, noting that 22 of 25 AI commitments in the Programme for Government are coming under an economic theme. This is reflected in the Committee's recommendations in section 2.1 for the national AI Office to function independently and to include mechanisms for societal collaboration and public input.

The need for a national conversation around AI was also highlighted by witnesses. The way AI has landed in our homes and on our devices with seemingly little information or consent was discussed during the Committee's meetings. Concerns around data, profiling algorithms and even LGBT+ people being outed need to be addressed. A 'wild west' in the current AI landscape was referred to, as well as a sense of a lack of consent around digitization or the feeling of being forced out of services. So, providing the public with information and a say in how this evolving technology is adopted in Irish society is a must.

This is reflected in the Committee's recommendations in section 2.1 for the national AI Office to include mechanisms for societal collaboration and public input.

Recommendations:

- 30. The State should take action to mitigate against an overreliance on the private sector on foot of AI.
- 31. The State should explore publicly owned AI resources and technologies.
- 32. A national conversation on AI and mechanisms for the public to have an input on how this evolving technology is adopted in Irish society is a must.

Inclusion and bias

AI adoption and regulation must be equitable and inclusive. Otherwise, this technology has the potential to deepen existing inequalities. Bias within AI systems was raised throughout the Committee's discussions and many people will be aware of incidents where AI has produced something based on damaging and discriminatory biases or stereotypes. An example referred to by the DPO Network was Google's widely used AI model, Gemma, downplaying women's physical and mental issues in comparison with men's when used to generate and summarise case notes.

The Committee heard that unbiased training data, humans in the loop, thorough research and detailed testing are some of the best ways to avoid further bias and ensure our embrace of this new technology is inclusive. Information and education are important here too, as having everybody more informed about AI and the potential biases or glitches it can produce will enable people to know what to look out for.

Another big part of the solution lies in making AI more representative and inclusive from the outset, by incorporating the input of a wider range of people and making sure the work and education opportunities that come with AI are open to everybody. Co-design or participatory design in this sense will both deliver more for people and provide savings for operators, as, the Committee heard, it is often more costly to tack on changes that meet accessibility or equality standards later. Having a variety of people at all phases in the

research and development of an AI product or solution can therefore deliver economic and equality gains.

- 33. Establish pathways and mechanisms to ensure underprivileged communities and marginalised groups are involved in the design and assessment of AI-powered tools and systems.
- 34. Guarantee that AI-systems or tools do not filter out voices from underprivileged communities or marginalised groups. Participation with civil society groups must be prioritised to ensure that language models used in machine learning processes recognise different dialects and input from different communities.
- 35. Information must be made available regarding an individual's rights concerning data, how and when data is used in AI, and how it can be removed or changed. This information must be available in a manner and in various formats that can be understood and accessed by all individuals.
- 36. Good practices and principles that make AI adoption and regulation equitable and inclusive are a must.
- 37. Equality by design should be a core element through all phases of developing an AI product or solution.
- 38. Thorough research and testing, keeping humans in the loop and unbiased training data should be mandatory to avoid biases and bad outcomes from AI.
- 39. Companies or public sector bodies that deploy biased or discriminatory AI systems should be regarded as in breach of equality and non-discrimination laws and should be actively pursued and prosecuted by state agencies as well as liable to individual litigation.
- 40. A key focus for Government in developing policies around AI must be how to avoid deepening existing inequalities or worsening the digital divide.
- 41. Tailored supports for underprivileged communities and marginalised groups need to be a core element of national AI strategies.

Energy and environment

Almost every stakeholder the Committee engaged with expressed concerns about the energy implications of AI.

Particular concerns were raised regarding the level of power and energy consumption in AI, the levels of heat being generated and how to reuse that heat, as well as the impact of data centres on Ireland's current grid capacity.

The Committee will be holding a designated module to look at these issues in detail. However, making the right decisions around the environment and AI now is essential.

Ciarán Seoighe from Research Ireland-Taighde Éireann warned the Committee:

"If one were to take the progress that had been made over the past 18 months or so, extrapolate forward and assume the same levels of growth and so forth, it would quickly get to the point where AI would consume more electricity than the planet generated."

The Committee heard from witnesses like Taidghe Éireann -Research Ireland- and the Advisory Council that for Ireland to benefit from AI, and participate in modern economy, we need to sort our energy out. The Committee recommends a transition to a plentiful supply of renewable and sustainable energy. An energy council comprised of full-time paid employees is needed to undertake this, the AI Advisory Council said. The Committee agrees.

In addition to prioritising fully renewable and sustainable sources of energy, a focus is also needed on making AI more environmentally friendly through for example better efficiency in algorithms, transforms, chips and how heat generated is reused.

Recommendations:

42. Issues around energy in Ireland need to be resolved, with plentiful sustainable and renewable energy being made available as an urgent priority. AI use and development must take account of the state's international obligations to reduce Ireland's overall energy use under EU Energy Efficiency Directive and our obligations under the Climate Act.

- 43. An energy council comprised of full-time paid employees should be established to resolve current issues around energy and plan for future needs and projects.
- 44. Solutions to make hardware, software and processes around AI more environmentally friendly must be found.

Accountability

The Council of Europe's Framework Convention on Artificial Intelligence sets out core principles, including human dignity, individual autonomy, equality, privacy, accountability, reliability and safe innovation. It is crucial that any departments, bodies or industries associated with AI are transparent, well-regulated and can be held accountable. When a person feels AI has discriminated against them or that they lacked consent in how an AI system uses their data, it is also crucial that they know who to hold accountable and where to turn for remedial action.

There is a body of work to be undertaken to inform the public about rights and remedies and to ensure that operators are working in line with regulations. The Committee is in favour of third-party audits of products or platforms as a means of increasing accountability. The Committee heard concerns about chatbots and public procurement.

- 45. Accountability, traceability, transparency and explainability must be embedded in AI in Ireland.
- 46. Where AI systems are used for decision-making, they need to be transparent, auditable and able to show proof of non-discrimination on the nine grounds set out in Irish equality law.
- 47. Those bodies with regulatory functions with regard to AI must conduct audits of AI enabled platforms to ensure compliance with the law. Those bodies must be adequately skilled and resourced to do this.
- 48. All public bodies and semi-state entities using AI in public services must publish annual evidence-based reports detailing benefits, disadvantages, and any

- inequalities identified. These reports should be made publicly accessible to ensure transparency and accountability.
- 49. Accountability and transparency in the public procurement process is a key concern.
- 50. The Department of Public Expenditure and Reform's 'Guidelines for the Responsible Use of AI in the Public Service' should be amended to include a reference to the Public Sector Human Rights and Equality Duty. The Duty should be the core framework guiding public bodies in their adoption of AI, ensuring that systems are rights-compliant from the start.
- 51. Any AI-powered tools or systems being considered for use by Government

 Departments or State bodies must follow a procurement process and undergo risk

 assessment and bias testing, before deployment.
- 52. A clear, auditable line of investigation should be established to ensure that regulators have access to vital information.
- 53. A publicly accessible central register for all algorithmic systems used by the Government and public bodies should be made mandatory. Information relating to public sector use of AI-powered tools and systems should be provided with details relating to the developer, deployer and vendor of AI-systems, procurement costs, the performance metrics used, and any findings of assessments carried out prior to deployment.
- 54. The Courts should be resourced to have the expertise necessary to determine and deliberate on defects within AI systems.
- 55. Recognising the operational challenges, the State should consider ways to monitor and report AI products developed in other jurisdictions that have been shown to have human rights breaches.
- 56. The Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation should provide clear guidelines, not only on the use but also on the procurement of AI systems and services.
- 57. Policies and practices should be put in place to ensure that there is an incentive and obligation in the corporate sector to protect and include minorities.

Young people

Young people who have so much of their lives, careers and educational opportunities ahead of them are the group likely to be most impacted by AI. It is imperative that their rights and wishes are central in AI discussion, design, policies, strategies and legislation. It was clear from the Committee's discussions that young people want to embrace AI, but that they want robust education and regulation around AI, and want companies to be made to take their responsibility to keep children safe online seriously. As highlighted by stakeholders in this space, UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNICEF guidance on AI and the UNCRC) provide a framework for addressing these issues from a children's rights-based perspective.

Some of the benefits of AI for young people that the Committee heard about include supporting their learning, assisting their teachers, helping them find community and learn about their identity, and assisting with making referrals to credible, human run support services.

Some of the harms or concerns related to AI that young people's organisations told the Committee about include the environmental cost of AI, over-reliance on it, misinformation, chatbots and AI presenting as a fake companion or relationship. Other harms are deepfakes, bias, stereotyping and harm to minority groups, LGBT+ people being outed, harm through body image issues, eating disorders and instructions on self-harm.

The Committee heard from the Irish Traveller Movement about how Traveller children are particularly vulnerable to hate based harms online, with automated discrimination inherent in some LLMs, algorithms and pages or bots being set up solely to negatively stereotype Travellers. Similarly, BeLonG To told the Committee that LGBT+ young people suffer from AI perpetuating discriminatory stereotypes and from AI-generated content that targets minority groups online. They are troubled by the recent weakening of content moderation by online platforms. Supports for underprivileged communities and marginalised groups have a big role to play in addressing these issues.

The session with young people underlined the need for strong enforcement of the Digital Services Act and safety by design and highlighted the damage that harmful and hateful content pushed by recommender systems that use AI causes. The session mirrored the concerns raised by various other Committees during in the 33rd Dáil and other evidence and research available about these harms.

Witnesses warned the Committee that for children, recommender systems have addictive design features to keep people using them. CyberSafeKids highlighted cases taken against AI companies by the families of children who tragically took their own lives.⁴ Addressing this, Dr Patricia Scanlon, Ireland's AI Ambassador, and Chair of the AI Advisory Council, observed that we have "failed miserably", that the EU AI Act is lacking on this issue and that political will is required.⁵ The Committee agrees and has therefore recommended this is addressed in Section 2.1. It is imperative that policy makers act now to ensure young people's protection online, including from harms associated with AI.

- 58. It is imperative that policy makers act now to ensure young people's protection online, including from harms associated with AI.
- 59. Children and young people's rights and wishes must be central in AI discussion, design, policies, strategies and legislation.
- 60. Additional funding for youth work should be provided to enable comprehensive work around issues relating to AI in those forums.
- 61. Operators must be legally required to ensure that any product, platform or system includes safety by design for children and does not infringe upon their rights.
- 62. Operators and tech companies must be legally obliged to ensure that any product, platform or system includes safety by design for children and does not infringe upon their rights.
- 63. Recommender systems should be designed so that recommended material that is put out delivers a balanced point of view, that is evidence based.
- 64. The EU AI Act, UNICEF AI guidance, and the UNCRC should form the minimum baseline for protection, with scope for additional safeguards as needed.
- 65. Mechanisms should be available for children to input on how they want their rights and values reflected in technology developments and remedies and complaints mechanisms provided for when infringements of rights occur.

⁴ See page 31 of transcript of meeting held on 23 September 2025.

⁵ See page 15 of transcript of meeting held on 24 June 2025.

66. UNICEF AI guidance and the UNCRC should inform Irelands response to AI and child safeguarding.

Older people

While AI can empower older people, witnesses told the Committee that the right policies, infrastructure and resources are essential. ALONE flagged that 41% of people over-75 years old have never used the Internet. Every stakeholder noted that increasing digitalisation can make older people feel excluded. Many organisations are doing brilliant work in building digital literacy among older people and should be well resourced.

Age Action highlighted the ageist discrimination involved when digitalisation to reduce costs doesn't consider the needs of older customers, who may no longer be able to access a service, may have to pay more, or may be exposed to safeguarding risks as a result.

Additionally, they are being left out of datasets used to train AI or treated, inappropriately, as a homogonous group. So, age-friendly AI is needed, that involves co-design and understanding older people's needs.

Some of the benefits of AI for older people that the Committee heard about include assistive and smart technology and reminders about important tasks and ALONE's work is being aided by a data information system and an AI tool to match older people with volunteers for their support and befriending service.

The Irish Senior Citizens Parliament reported serious concerns around AI being put forward as a solution to loneliness and deepfakes. They also highlighted the cost barriers and lack of plain English involved in engaging with technology and the need for up-to-date smartphones for things like mygov.ie and banking apps.

Given that Ireland lags in electronic health records, ranking lowest in the EU for e-health and citizen access, ALONE said that effective implementation of strategies like Digital for Care, the HSE data ecosystem roadmap and the Health Information Bill 2024 is essential to embed AI successfully.

Data privacy and informed consent came up repeatedly during the Committee's meetings, including the session on older people. All users should easily be able to turn features on and off and decide who has access to their data. Plain English communication should be required from operators.

The issues raised in this session with older people strike the Committee as fixable, and as tangible ways to improve quality of life not just for our older population, but for everyone.

The trick will be demanding them of providers and implementing regulations effectively. On this, Age Action warned:

"It is not strong enough or sufficient to say it should do certain things and should not, for example, replace human interaction. We need some legislative heft in order to manage these safeguards."

- 67. Older people, their families and those who provide care for them, should be collaborated with throughout AI product development, including in datasets, product design and testing and roll-out.
- 68. AI should complement, not replace, human contact, with human support options for services being a legal requirement.
- 69. Further funding should be allocated to organisations working to support older people in light of recent technological developments.
- 70. More funding and grants and community resources should be made available to enable older people to engage with newer technology, as the €2.50 a week telephone allowance is now insufficient.
- 71. Digital for Care, the HSE data ecosystem roadmap and the Health Information Bill 2024 should be progressed, and their implementation should take account of developments in AI and the issues outlined in this report.
- 72. All users should easily be able to turn features on and off and decide who has access to their data.
- 73. Plain English communication is required from operators.

74. Where AI systems are introduced in public services, human support options should remain available for individuals or groups who cannot or choose not to engage with AI technology.

Disability

The Committee heard that 22% of the population declared a disability in the 2022 census. There is already a severe poverty for disabled people, whose households have between €488 and €555 in additional costs per week. Employment was also a serious concern. A recent report found employment for disabled people in Ireland to be 20% below the EU average level of employment, the worst in the EU.⁶ The impacts of AI, which witnesses believed "is not neutral," and how it may benefit or further disadvantage disabled people should be a top priority within this developing policy area.

Some of the benefits witnesses said AI may offer in terms of disability include supporting inclusive education and workplace accessibility, aiding independent living, voice detection, home controls, research, drafting and compiling information. It could also help with geographically accessible maps for wheelchair users, reduced costs for voluntary organisations, more accessibility in menus, nutrition information and price comparisons.

On the other hand, AI poses risks and challenges for disabled people. Witnesses stressed the significant risks AI-based systems posed to equal participation, citing a 2023 report by the OECD entitled "Using AI to Support People with Disability in the Labour Market: Opportunities and Challenges," which notes that the increasing use of AI-powered tools in the workplace bears several risks. The Committee agrees that integrating disabled people in the workplace and having them on the team as staff, whether that is within the Oireachtas, tech companies or others who may be developing AI, is the most profound and best way to ensure diverse input into the development of services.

The Committee heard that a fundamental concern centres on training data biases, where current AI systems reflect and perpetuate existing inequalities due to the significant

⁶ See DPO Network opening statement.

underrepresentation of people with disabilities in their development.⁷ One witness noted the failure of AI to recognise pedestrians or certain situations due to a lack of input in the dataset. Witnesses acknowledged that State agencies are likely to deploy AI for "data-driven" decisions, stressing that disabled people, through DPOs, must inform those decisions and the potential risks they may pose to autonomy and choice. The Committee agreed that bringing disabled people and deaf people in to do testing after a system has already been developed is too late. Affordability issues, AI interfaces that rely on modes of interaction that exclude users with disabilities, privacy and security concerns, and literacy and training gaps were also raised.

Data can reveal deeply personal information about health, mobility, communication or support needs. Knowing that it is often mined, sold and used for commercial purposes, witnesses told the Committee that disabled people have an additional concern that this data will be used against them. Disabled people often rely heavily on public services, supports, and assistive technologies, meaning they may be subject to more frequent and detailed personal data records than others, which might expose them to discrimination or privacy violations. This concern is magnified when data is used in public services and for decision-making, where that data can be misinterpreted or misused. The DPO Network told the Committee that the high-risk classification for AI under the EU AI Act should automatically apply for areas around disability and supports for disability, particularly in legal, medical and educational support contexts.

The DPO network also highlighted a recent report by the London School of Economics Care Policy and Evaluation Centre, which found that large language models (LLMs), used by over half of England's local authorities to support social workers, may be introducing gender bias into care decisions.

One of the main themes the DPO Network discussed was co-creation - the need for disabled people to be at the table, even at the design or procurement stages of engaging an AI service, so that AI solutions can cater for everyone's needs and rights. The National Disability Authority (NDA) brought a focus on universal design to the discussion,

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recommending that those principles underpin AI in public services and that AI systems offer multiple modes of interaction.

Voice of Vision Impairment (VVI) explained how visually impaired people using text to artificial speech conversion tools are more exposed to risks around privacy, data use and identity theft where AI encounters their information, so secure offline tools are needed. VVI also recommended that where AI systems are used for decision-making, they need to be transparent, auditable and able to show proof of non-discrimination on the nine grounds set out in Irish equality law. The Committee supports this a general recommendation, and it is set out in recommendation 46.

Deaf people should be central in the design, development and deployment of sign language AI technologies and should be supported to engage in national and EU- level frameworks that support their linguistic autonomy.

Witnesses stressed that the State is not meeting its obligations under the UNCRPD, suggesting that the human rights strategy and the implementation of co-creation are starting points for advancing its implementation. The Disability Federation of Ireland summarised the task at hand well, stating:

"While AI has the potential to support independent living, participation and active citizenship for the disability community, it is only if the inherent biases of AI systems are identified and corrected; if the diversity of lived experience of disability is acknowledged and addressed, with a primary focus on co-design and co-creation; if the cost burden of AI systems and enabled technologies do not fall on individuals; and if there are strong regulatory systems in place, with accessible and freely available information on AI to increase awareness and understanding."

The Committee backs this, and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the EU AI Act and the public sector duty provide the legal framework. The nine designated authorities and the GovTech Delivery Board will also play a role here. As part of its role, the national AI office should commit to ensuring that disabled people can collaborate and contribute so that AI tools and systems benefit people with disabilities rather than creating additional barriers for them and that private operators and public services operate in a manner that is based on the principles of equality and

autonomy. As asserted by the DPO Network, "we need to control and direct AI to meet our needs, not have AI direct and control our lives."

- 75. How AI may help or hinder, in terms of disability, and addressing the bias prior to deployment of AI tools or services, should be a top priority within this new policy area.
- 76. The aids and appliances grant and the home adaptation grant should be increased and expanded to include newer technologies that disabled people can benefit from, or alternatively, an additional new non means tested grant should be established to enable access to technology.
- 77. Secure offline tools should be developed for disabled people, including people who use text to artificial speech conversion tools so that their privacy, data and identity information is better protected.
- 78. Deaf people should be central in the design, development and deployment of sign language AI technologies and should be supported to engage in national and EU-level frameworks that support their linguistic autonomy.
- 79. The GovTech Delivery Board and AI Advisory Council should have a dedicated role for or membership of civil society organisations, such as DPOs, Human Rights Advocates and people representing marginalised groups and communities'
- 80. The National AI office should have a dedicated role for, or a board with members from DPOs and disability organisations to ensure that the benefits and risks posed by AI on people with disabilities are at the forefront of any policy decisions, particularly the development of AI ethical regulations.
- 81. Additional funding should be provided to DPOs and disability organisations to build further capacity and improve digital literacy amongst disabled people so they can continue to play an important role in helping Ireland meet its obligations around disability under the UNCPRPD, EU AI Act and public sector duty in light of the new challenges AI presents.

- 82. Resources should be provided to DPOs, and disability organisations and disabled people to ensure they can continue to provide expertise and to collaborate with Government Departments, State agencies and other bodies.
- 83. Guided by the blueprint set out by the DPO network, where Government

 Departments or State bodies are considering the deployment of AI, pathways and
 mechanisms should be established to ensure disabled people are involved in the
 design and assessment of those services.
- 84. There must be equitable access to AI-powered tools that can benefit disabled people, or address education, literacy and digital gaps, including for those in prison or other congregated settings.
- 85. To increase input from people with disabilities, a feedback loop or mechanism should be established by the AI Office so that we can better understand how users are interacting with AI and the difficulties they experience.

Glossary

AI: Artificial intelligence, is defined in the EU AI Act as follows:

AI system' means a machine-based system that is designed to operate with varying levels of autonomy, that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments.

GDPR: General Data Protection Regulation, a European Union regulation on information privacy in the European Union and the European Economic Area.

SMEs: Small and medium-sized enterprises

LLMs: Large language models, advanced artificial intelligence systems designed to understand and generate human-like text.

UNICEF: Originally known as the United Nations International Children's Emergency Fund, the United Nations agency for children, works to protect the rights of every child.

UNCRC: United Nations Convention on the Rights of the Child

Bias: In AI, bias usually involves incidents where AI has produced something based on damaging and discriminatory biases or stereotypes. An example referred to by the DPO Network was Google's widely used AI model, Gemma, downplaying women's physical and mental issues in comparison with men's when used to generate and summarise case notes.

Codesign/universal design/participatory design: These refer to involving the needs and perspectives of many users. While codesign can refer to the process and universal design usually refers to principles. On this the NDA said:

"Universal design is also based on codesign and coproduction principles and we advise the importance of AI service providers meaningfully involving disabled people during design and training phases, where biases can be more easily identified and resolved. Ideally, AI systems should offer multiple modes of interaction that genuinely accommodate diverse user needs and preferences rather than treating accessibility as an afterthought."

DPO Network: Disabled Persons' Organisations Network

Civil society in this report refers to people working in pursuit of common interests and values through formal and informal organisations.