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ALGORITHMIC ACCOUNTABILITY IN PUBLIC ADMINISTRATION: GOVERNANCE, ADMINISTRATIVE JUSTICE, AND LEGAL CHALLENGES IN PAKISTAN

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Abstract

The increasing use of algorithmic and data-driven technologies in Pakistan's public administration, including automated tax profiling, biometric authentication, and targeted welfare delivery, raises significant accountability challenges that remain insufficiently examined in the existing literature. This article examines how Pakistan can ensure the legal accountability, transparency, explainability, and procedural fairness of automated decision-making in public administration. It adopts a doctrinal legal approach complemented by qualitative public policy analysis to examine the constitutional and administrative law framework of Pakistan, with particular reference to Articles 4, 9, 10A, 14, and 19A of the Constitution. Comparative jurisprudence from the United States, the United Kingdom, and the Netherlands is used to identify legal principles relevant to the Pakistani context. The article proposes an Algorithmic Accountability Framework for Public Administration (AAFPA) comprising four mutually reinforcing dimensions of accountability: legal, administrative, technical, and democratic. The analysis finds that although Pakistan's administrative law provides a normative basis for algorithmic accountability, it lacks the procedural safeguards, institutional capacity, and statutory mechanisms necessary for effective implementation. The article concludes by recommending legislative and

institutional reforms to strengthen accountability before the wider adoption of algorithmic decision-making in public administration.

1. Introduction

The integration of algorithms into public-sector decision-making in Pakistan reflects broader international trends. Algorithms are increasingly being used in areas such as eligibility assessments for social protection programs, risk assessments in tax compliance, biometric authentication for purposes of identification and welfare, and experimental or emerging predictive analytics in policing and border control. These developments are already observable within Pakistan's public administration. NADRA already runs vast biometric identity systems behind many administrative procedures, while the Federal Board of Revenue has experimented with data-analytics-driven risk profiling for tax compliance. As governments increasingly explore transitions from decision-support toward more autonomous decision-making systems, a governance gap emerges between the principles of administrative law tailored for human decision-making and the working methods of algorithms.

This study focuses exclusively on the legal accountability of algorithms used for decision-making in the Pakistani context of administrative justice and administrative law. This article does not assess Pakistan's readiness for artificial intelligence. Instead, it examines whether automated decision-making can be made legally accountable, transparent, explainable, and procedurally fair within Pakistan's administrative law framework.

2. Literature Review

Algorithmic accountability has emerged as an interdisciplinary field at the intersection of computer science, legal studies, and public administration. The pioneering contribution by Citron (2008) on the concept of "technological due process" established that the use of algorithms in welfare and benefit administration in the United States had led to the breakdown of procedural safeguards which would have been ensured by the doctrine of due process of law since the rationale behind the decision-making process remained hidden from both the claimant and the reviewer. Similarly, Citron and Pasquale (2014) elaborated the argument by extending the concept of scored decision-making and arguing that due process entails not only an opportunity to present an argument but also the ability to contest the ground for the score itself.

The second wave of literature has attempted to map out these issues onto principles of administrative law doctrine. Coglianese and Lehr (2017, 2019) have explored the intersection between machine-learning decision-making and the principle of reasoned decision-making and judicial review in

American administrative law and determined that explainability is not just a technical necessity, but a legal requirement of judicial review. Similarly, Cobbe (2019) has come to these same conclusions regarding English public law, observing that automated decision-making raises questions regarding the boundaries of judicial review principles that have been developed in the context of discretionary human decision-making. These issues include especially the obligation to provide reasons and the principle against fettering discretion. Zalnieriute, Moses and Williams (2019) have asserted that the process of automation may undermine fundamental rule of law values of legality, transparency, and availability of remedies if not consciously designed in order to promote them. Both Yeung (2018) and Kroll et al. (2017) have independently advocated that ex ante measures should be taken in order to ensure the accountability of the system.

Another approach involves tying algorithmic accountability to theories of public accountability and public value. Bovens (2007) conceptualizes accountability as a relationship in which an actor is required to explain and justify its conduct before a forum. However, it appears as an odd fit to algorithms that do not present a single identifiable actor. The concept of public value introduced by Moore (1995), further developed in Bovens et al.'s (2014) Oxford Handbook of Public Accountability, proposes that the legitimacy of public administration extends beyond mere adherence to law and requires administrative decisions to be fair and justifiable to citizens who are participants of democracy. Transparency alone, as emphasized by Diakopoulos (2016) and Ananny & Crawford (2018), is not enough to guarantee accountability.

The work of Pakistani scholars in the field of administrative law, particularly the work of Fazal Karim (2006) on judicial review of governmental action and that of Khan (2015) on administrative law doctrines in Pakistan, offers an authoritative basis for natural justice, rational decision making, and judicial review but does not refer to algorithmic administration at all since it preceded its advent. The present study addresses this gap as it applies the existing doctrines of Pakistani administrative law together with international algorithmic accountability literature to automated governmental decision making.

3. Theoretical Framework

The analytical framework integrates four complementary theoretical perspectives. Algorithmic accountability theory (Citron, 2008; Kroll et al., 2017; Yeung, 2018) provides the conceptual framework needed to explore the nature of disrupted accountability relations caused by automation and identifies transparency, explainability, auditability and contestability as related but distinctive principles. Second, the study employs

administrative justice theory, as represented in the literature (Fazal Karim, 2006; Khan, 2015) regarding natural justice and reasoned decision-making. Third, good governance and rule of law theory (Zalnieriute et al., 2019; Council of Europe, 2024) provides the general framework in which algorithmic accountability relates to the values of legality, non-arbitrariness and remedy. Fourth, public value theory (Moore, 1995; Bovens et al., 2014) adds the public accountability dimension stressing that legitimate use of public power relies on its intelligibility for the citizenry.

4. Methodology

This study employs qualitative doctrinal legal analysis complemented by qualitative public policy analysis based exclusively on secondary sources. The legal-doctrinal part focuses on the Constitution of Pakistan, 1973 (The Constitution of the Islamic Republic of Pakistan, n.d.), the pertinent legislation such as Right to Access to Information Act, 2017, (Pakistan, 2017), Prevention of Electronic Crimes Act, 2016 (Pakistan, 2016), Draft National Artificial Intelligence Policy 2023 (Government of Pakistan, Ministry of Information Technology and Telecommunication, n.d.), Draft Personal Data Protection Bill 2023 (Government of Pakistan, Ministry of Information Technology and Telecommunication, 2023), and judicial precedents from the superior courts regarding natural justice and administrative discretion.

The comparative analysis draws on a purposively selected set of foreign judicial decisions and international legal instruments. These include the Dutch SyRI judgment (NJCM c.s. & FNV v. The State of the Netherlands, 2020), the UK Bridges decision (R (Bridges) v Chief Constable of South Wales Police, 2020), the US Loomis case (State v. Loomis, 2016), the General Data Protection Regulation (European Union, 2016), the EU Artificial Intelligence Act (European Union, 2024), and the Council of Europe Framework Convention (Council of Europe, 2024). Together, these sources illustrate emerging legal approaches to profiling, biometric surveillance, due process, data protection, and rights-based AI governance. These sources were selected because they illustrate an emerging legal framework to comprehend the concept of algorithmic accountability, specifically, profiling and non-discrimination, biometric surveillance, due process in risk scoring, data protection by design, and human rights-based AI regulation, respectively. Foreign judicial rulings are used only to demonstrate transferable legal principles and are not considered legally binding.

5. Governance and Legal Analysis

5.1 The Constitutional Foundation and Its Silence on Automation

The Constitution of Pakistan does not expressly contemplate algorithmic decision-making. Nevertheless, several constitutional

provisions establish standards that apply irrespective of whether administrative decisions are made by humans or algorithms. The first such article is Article 4, which states that no action destructive of the life, liberty, body, reputation, or property of any person shall be taken except in accordance with law. Moreover, Article 9, which protects the life and liberty of citizens and, according to judicial interpretation in Pakistani courts, includes a guarantee of fair procedure (Fazal Karim, 2006).

The 18th Amendment has added Article 10A, which expressly safeguards the right to a fair trial and due process for the determination of "his civil rights and obligations," a sufficiently broad formulation that may reasonably be interpreted as extending to determinations made through algorithmic decision-making. Article 14 safeguards the dignity of the individual, a fundamental value violated whenever an unknown or unaccountable scoring or profiling system classifies someone without his consent or participation. Similarly, Article 19A was added through the 18th Amendment and provides the right to information in matters of public interest, directly addressing the issue of access to the criteria, the logic, and the data behind an automated decision.

The problem is not with textual presence but with doctrinal underdevelopment. None of these constitutional provisions, nor the jurisprudence interpreting them, directly addresses disclosure, explanation, or contestability in algorithmic decision-making. Existing doctrine assumes a human decision-maker rather than an automated system. Consequently, Pakistani administrative law provides little guidance on accountability where decisions are produced wholly or partly through algorithms. Administrative law in Pakistan has evolved the doctrine of *audi alteram partem* or the 'right to be heard' as one of the key natural justice principles applicable to administrative decision-making, in line with the general common law tradition that was inherited by Pakistani jurisprudence (Fazal Karim, 2006; Khan, 2015). The right to be heard implies a rational basis for the decision which can be contested by the affected individual. As argued separately by Citron (2008) and Cobbe (2019), this implication cannot be sustained where the rational basis for the decision has itself been embodied in the statistical model or the scorecard.

5.2 Reasoned Decisions and the Duty to Give Reasons

The other principle in the realm of Pakistani administrative law closely connected to the principle of the legality of administrative action is the principle of reasons, which is considered a corollary to the concept of natural justice and a prerequisite for the possibility of judicial review (Fazal Karim, 2006). Where a decision is generated, wholly or partly, by an algorithmic model, particularly

one relying on machine learning rather than fixed, auditable rules, the reasons available to the citizen and to a reviewing court may be limited to a numerical score or classification without an intelligible causal account of how that score was produced. Coglianese and Lehr (2019) has described the dilemma between prediction accuracy and explainability as the key one for the process of administrative decision-making based on algorithmic models. Pakistani administrative law has not yet developed an established approach to this issue because it has not arisen in judicial practice.

5.3 Judicial Review of Automated Administrative Action

The judicial review of administrative actions in Pakistan, through which the High Courts review such actions in terms of their legality, procedural impropriety, and in a relatively limited sense of reasonableness, under Article 199 of the Constitution, entails that the courts have the power to review the illegality, procedural impropriety, and unreasonable administrative actions. In the context of judicial review of an algorithmic decision, three principal legal challenges arise. First, the issue of legality review involves an inquiry into whether the decision-maker had the legal authority to make a certain decision, especially in a situation where no statutory or subsidiary legislative authority exists for the use of an algorithmic tool. Second, the issue of procedural impropriety review necessitates that the court must be able to understand the process by which an algorithmic decision was made.

Third, judicial review for unreasonableness or arbitrariness presupposes an identifiable standard of assessment. Courts are experienced in evaluating the reasonableness of human decision-makers. However, they generally lack both the technical expertise and procedural mechanisms such as algorithmic audits or expert examination to assess machine-generated decisions. Zalnieriute et al. (2019) identify precisely this difficulty in their broader analysis of automation and the rule of law, arguing that judicial review doctrines calibrated to human discretion require adaptation, rather than simple extension, when applied to automated systems.

5.4 Data Protection, Privacy, and the Absence of a Statutory Anchor

There is no comprehensive data protection law currently implemented in Pakistan. Pakistan has pursued comprehensive data protection legislation since the release of the first Draft Personal Data Protection Bill in 2018 (Government of Pakistan, Ministry of Information Technology and Telecommunication, 2023). At the time of writing, the most recent consultation version is the Draft Personal Data Protection Bill 2023, which has not yet been enacted. This legislative gap is particularly significant for

algorithmic accountability. Comparative experience demonstrates that comprehensive data protection legislation provides the principal legal basis for rights relating to automated decision-making, including the rights to explanation, human review, and objection to profiling. Under the General Data Protection Regulation in the European Union, for example, automated decisions "based solely on automated processing" with legal or similar significance may be made only if certain guarantees are in place, including the right to obtain human intervention (European Union, 2016).

The Prevention of Electronic Crimes Act, 2016 of Pakistan deals with cyber crimes and, by implication, some aspects of data offenses, although it was not formulated nor does it serve as a data protection act or a bill to regulate algorithms (Pakistan, 2016). The Right of Access to Information Act, 2017 gives the people of Pakistan a right of access to information in possession of public authorities, which is essential but insufficient for making algorithms accountable, because access to information does not necessarily ensure comprehensible information or the logic of an algorithm (Pakistan, 2017).

5.5 The Draft National Artificial Intelligence Policy 2023

The Ministry of Information Technology and Telecommunication issued a Draft National Artificial Intelligence Policy for public consultations, expressing aspirations for responsible and ethical use of AI in various domains, among which is governance (Government of Pakistan, Ministry of Information Technology and Telecommunication n.d.). However, the Draft National Artificial Intelligence Policy 2023 is yet to be finalized or adopted by the government. The draft policy document is written in the language of strategic ambition and not administrative law, and it does not turn the expressed commitment to transparency and accountability into any procedural rights, oversight institutions, or citizen protections from algorithmic administrative decision-making processes. This remains a limitation of many national AI policy strategies worldwide, and it is not something specific to Pakistan. Nevertheless, Pakistan's algorithmic governance policy commitments are primarily aspirational rather than legally binding.

5.6 Comparative Jurisprudence: Lessons for Pakistan

Judicial decisions from three jurisdictions illustrate legal principles that are directly relevant to Pakistan while remaining sensitive to differences in legal context.

The Dutch case law provides for the decision by the District Court of The Hague regarding the SyRI system used by the government to find welfare fraud among citizens, as this system combined data from several agencies

and created risk scores for individuals. This process was found to infringe upon the right to private life under Article 8 of the European Convention on Human Rights due to the lack of transparency and safeguards to prevent disproportionate interference, especially considering the risk of stigmatization of poor citizens (NJCM c.s. and FNV v. The State of the Netherlands, 2020).

In the UK, the Court of Appeal in the case of Bridges ruled that the use of automated facial recognition by the South Wales Police in public places was illegal because the police force did not specify sufficiently how the list of those that would be included in the watch list and places where it could be used were determined. Hence, it allowed a wide margin of discretion contrary to the "in accordance with law" criterion provided for in Article 8 of the European Convention on Human Rights, and because the police force failed to fulfill its obligation under the Public Sector Equality Duty to carry out a test for discrimination risk (R (Bridges) v Chief Constable of South Wales Police, 2020). The legal requirement of clear criteria of an algorithmic system's applicability and deployment is easily applicable to Pakistan's legal requirement under Article 4 that administrative action be "in accordance with law."

In the United States, in the case of State v. Loomis, the Wisconsin Supreme Court took into consideration the issue of the use of proprietary risk assessment algorithm (COMPAS), which could not be made accessible to the defendant due to the fact that the algorithm itself was a trade secret, to make decisions during the sentencing process. The court allowed for the use of the instrument but only under the condition of cautioning the judges in writing about the limitations of the software (State v. Loomis, 2016). The case reveals the conflict that arises in terms of the use of proprietary algorithms versus the need for an intelligible basis of decision-making, which would be faced directly by Pakistan if it decided to use algorithmic technologies from the private vendors in a confidential manner (Coglianese & Lehr, 2019).

Table 1: Comparative Judicial Decisions on Algorithmic Accountability and Their Relevance for Pakistan

Case / Jurisdiction	Core Legal Principle	Relevance for Pakistan
NJCM v. Netherlands (SyRI), District Court of The Hague, 2020	Opaque, insufficiently regulated profiling systems can violate the right to private life even absent proven discriminatory outcomes	Supports the case for statutory transparency requirements for risk-profiling tools in Pakistani tax and welfare administration
R (Bridges) v Chief Constable of South Wales Police, EWCA, 2020	Automated systems require clearly defined, publicly ascertainable rules of scope and use to satisfy the "in accordance with law" standard	Reinforces Article 4's legality requirement; supports statutory, not merely administrative, authorisation for algorithmic tools
State v. Loomis, Wisconsin Supreme Court, 2016	Proprietary algorithmic tools may inform but not determine decisions affecting individual rights; disclosure limitations raise due process concerns	Relevant to Pakistan's procurement of vendor-supplied AI systems and the applicability of Articles 9 and 10A

These actions collectively give rise to three generalizable principles: opacity is a harm that is legally recognizable; legality demands that specific rules be established instead of general authorization; and the use of technology should assist, not replace, human responsibility in decision-making. None of these principles are expressly articulated in Pakistani law in relation to algorithmic decision-making.

6. Proposed Algorithmic Accountability Framework for Public Administration

Building on the preceding analysis, this section of the paper proposes a novel Algorithmic Accountability Framework for Public Administration (AAFPA), which includes four interrelated dimensions of accountability. The framework is tailored to Pakistan's administrative law tradition while drawing on theories of accountability, administrative justice, and public value (Bovens, 2007; Kroll et al., 2017; Moore, 1995).

Legal Accountability: It implies the necessity of any algorithmic system to be employed within the realm of public administration to be legalized through statutes or subordinate legislation, according to the provision of Article 4 on legality, be it in the form of the statutory right to receive an explanation of how the algorithmic system works, and be subjected to judicial review pursuant to Article 199, with the support of procedural rules making the workings of the system accessible to the courts and litigants.

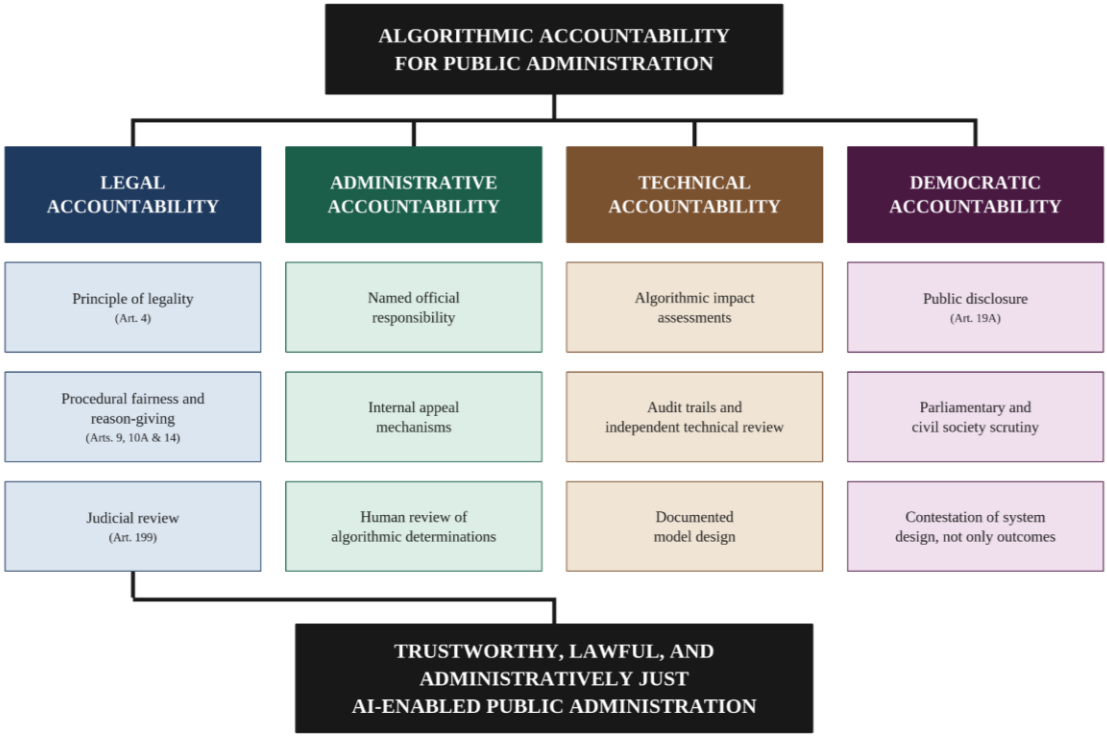
Administrative Accountability dimension mandates that the use of algorithmic decision-making be firmly rooted in, and not replace, existing administrative hierarchies and appeal/review procedures; that there be individual accountability of a public official for the decisions taken based on algorithmic tools; and that there be explicit

accommodation of such challenges in the internal administrative appeal/review process.

Technical Accountability dimension mandates auditable design of the algorithmic system, with mandatory algorithmic impact assessments before deployment, audit trails, and technical review mechanisms, as per the "accountable algorithms" framework suggested by Kroll et al. (2017) and algorithmic impact assessment practices prescribed by Yeung (2018).

Democratic Accountability dimension mandates public disclosure of the algorithmic system, its objectives and mode of operation, as per Article 19A, meaningful opportunities for public and parliamentary deliberation before full-scale implementation; and means through which individuals and civil society organizations can contest not only specific decisions made, but also the design and implementation of the algorithmic systems themselves. This is in keeping with the public value theory focus on legitimacy as a democratic, and not simply legal, necessity (Moore, 1995; Bovens et al., 2014).

Conceptual Figure 1: The Algorithmic Accountability Framework for Public Administration



The framework demonstrates that none of the dimensions can work on its own. Legal accountability without technical accountability creates rights that exist in law but cannot be effectively exercised in practice. For example, a statutory right to an explanation has little practical value if the underlying algorithm cannot be audited. Technical accountability without administrative accountability creates systems that produce output that no administrator feels accountable to defend. Administrative accountability without democratic accountability creates systems that are internally reviewable but are opaque to external review.

7. Discussion

The foregoing analysis demonstrates that, far from remaining silent on algorithmic accountability, the constitutional and administrative law of Pakistan possesses constitutional text and legal doctrine that are normatively adequate but doctrinally underdeveloped. Collectively, Articles 4, 9, 10A, 14, and 19A provide the normative foundations of legitimacy, legality, due process, dignity, and information rights required for an adequately developed system of algorithmic accountability (The Constitution of the Islamic Republic of Pakistan. n.d.). The principal deficiency lies not in constitutional principle but in statutory implementation and institutional capacity. It reflects Zalnieriute et al. 's (2019) broader point that automation puts rule of law principles to their greatest test not in their absence, but in their inadequate operation to a novel form of decision-making.

These findings have important implications regarding the theory of administrative justice. Fazal Karim's (2006) and Khan's (2015) conception of natural justice in Pakistani administrative law assumes a human decision-maker who can provide an explanation and be interrogated on it. This assumption remains valid for algorithmic decision-making, but the relevant "explanation" lies in the training data, model architecture, and threshold decisions which are not self-explanatory and in some cases may not even be reconstructible after the event without deliberate technical effort (Kroll et al., 2017). Unless adapted to algorithmic decision-making, Pakistani administrative law risks satisfying the formal requirements of natural justice while failing its substantive objectives. Hearings and decisions may still occur, yet affected individuals may remain unable to understand or meaningfully challenge the reasoning underlying those decisions (Citron, 2008; Cobbe, 2019).

Another illustration of this argument comes from comparative jurisprudence addressed in Section 5.6. The case of NJCM c.s. and FNV v. The State of the Netherlands indicates that courts may recognize the legal damage arising from the opacity of algorithms independently from any discrimination findings (2020).

Considering how this principle may be applied to Pakistan, citizens whose rights were interfered with in connection with, for example, an opaque risk-score calculator may claim a violation of Article 4 and Article 14 despite failing to prove that their scoring was inaccurate or discriminatory because the opacity of the process itself is a legal damage. This is because Pakistani courts have not ruled on whether the legal damage is constituted through this process, while existing doctrine does not provide a definite answer to this question.

The failure to implement data protection laws further widens this gap. It is clear from comparative studies, especially those conducted under the General Data Protection Regulation of the European Union, that the right to receive an explanation and human intervention in decisions made by algorithms comes mainly through statutory guarantees, which relate specifically to the process of automated decision-making and not from general principles of administrative law (European Union, 2016). It follows that the approach adopted in Pakistan by relying on the Right of Access to Information Act, 2017, which is a general transparency law, will be inherently weak, because it grants only access to documents (Pakistan, 2017).

On the other hand, when viewed from a governance theory standpoint, the Draft National Artificial Intelligence Policy's lofty statements on accountable and transparent uses of AI (Government of Pakistan, Ministry of Information Technology and Telecommunication n.d.) are precisely those kinds of accountability principles without forums as per Bovens (2007). These commitments to accountability do not have any institutions, including judicial, administrative, or parliamentary oversight, that may be set up and where such algorithmic decision-makers could be asked to account for their actions. Similar patterns are evident across national AI strategies internationally, where commitments to accountability outrun the actual statutory and institutional framework required for such obligations (Yeung, 2018).

Finally, the outlined Algorithmic Accountability Framework reveals that it is not the enactment of the comprehensive AI law that is the key governance challenge of Pakistan, but the more modest task of integrating each of the four accountability dimensions into the existing legal framework, including the data protection law, access to information framework, industry-specific administrative laws, and judicial review.

8. Conclusion

This article has examined the problem of algorithmic accountability in Pakistan's public administration based on administrative justice and administrative law. The analysis demonstrates that the existing constitutional basis in Pakistan, including Articles as 4, 9,

10A, 14, and 19A, provides sufficient normative principle, yet lacks proper institutional and statutory translation for ensuring algorithmic accountability. Transferable principles of jurisprudence based on the cases taken from the Netherlands, the UK, and the USA include that of opacity being the source of harm, legality presupposing clear regulations, and the necessity of informing rather than automating the process of decision-making.

The Algorithmic Accountability Framework for Public Administration (AAFPA) proposed in this article combines legal, administrative, technical, and democratic accountability into mutually reinforcing elements that are required for proper governance through algorithms. As Pakistan advances its national AI policy and data protection framework, the reform measures highlighted here, namely, a legal right to explanation, mandatory algorithmic impact assessments, improved appeal processes, and an oversight authority, provide a viable way of ensuring that algorithms used in decision-making within the Pakistani government are indeed subject to the rule of law and democratic accountability.

9. Recommendations

To begin with, Parliament ought to enact the Draft Personal Data Protection Bill so that it provides, drawing on but not replicating Article 22 of the General Data Protection Regulation, an individual's right not to be subjected to decision-making based solely on automated processing that produces legal or similarly significant effects, alongside the right to obtain human intervention and to challenge such decisions.

In addition, the Right of Access to Information Act, 2017 should be amended, or regulations issued thereunder, to require public bodies to disclose the general principles of operation, purpose, and categories of data used by algorithmic systems in administrative decision-making, except where disclosure is legitimately restricted on national security or other legally recognized grounds.

Furthermore, any algorithmic system deployed in functions affecting individual rights, such as risk-based tax profiling, welfare eligibility determinations, or biometric identification systems, should be subject to a mandatory Algorithmic Impact Assessment before deployment. The assessment should evaluate legality, proportionality, data protection, and discrimination risks in accordance with the approaches proposed by Kroll et al. (2017) and Yeung (2018), while applying the legality principles articulated in Bridges (2020).

Equally important, internal administrative appeal mechanisms across public agencies should be revised to provide a right of appeal against algorithmically assisted administrative decisions, ensuring that affected individuals have access to meaningful human review in

line with the due process concerns identified in Loomis (2016).

Moreover, Pakistan should establish a dedicated oversight body, either within an existing regulatory institution or as an independent authority, empowered to review algorithmic impact assessments, receive complaints concerning algorithmic administrative decisions, and submit periodic reports to Parliament. Such an institution would create the "forum" that Bovens (2007) identifies as essential for any effective accountability relationship.

At the judicial level, the superior judiciary should develop practice directions or guidelines governing the judicial review of automated administrative decisions. These should address the disclosure of algorithmic logic, the treatment of proprietary or vendor-supplied systems, and the appropriate standards of review for statistical and predictive decision-making, drawing on the comparative principles discussed in Section 5.6.

Finally, once the Draft National Artificial Intelligence Policy 2023 is finalized, it should be revised to move beyond aspirational commitments by incorporating enforceable procedural safeguards reflecting all four dimensions of the proposed Algorithmic Accountability Framework for Public Administration (AAFPA).

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