

The background is a dark blue color with various geometric patterns. In the top left, there is a yellow circular graphic with a grid pattern. In the center, there is a large teal circular graphic with a grid pattern. In the bottom left, there is a large orange arrow pointing right. In the top right, there is a large white arrow pointing left. The text and logos are positioned in the upper right quadrant.

Society  
Inside



European Center for  
Not-for-Profit Law

# FRAMEWORK FOR MEANINGFUL STAKEHOLDER INVOLVEMENT IN THE DESIGN OF PRODUCTS AND SERVICES USING ARTIFICIAL INTELLIGENCE

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## THE FRAMEWORK FOR MEANINGFUL ENGAGEMENT GUIDANCE FOR CONVENORS



### 1 Creating a shared purpose

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- Some possible purposes for stakeholder engagement
- Engaging internal and external stakeholders in defining purpose and outcomes

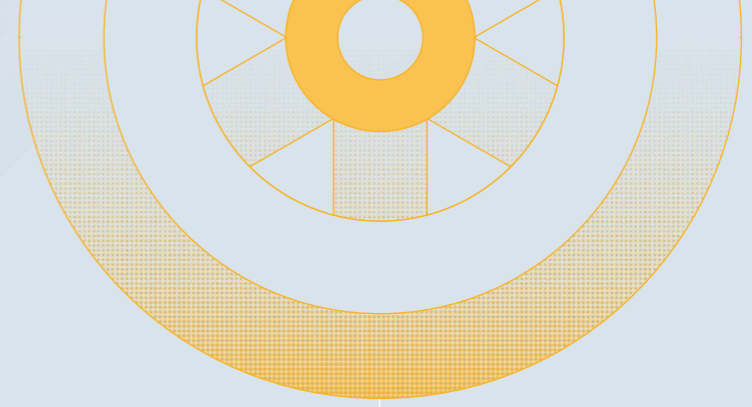
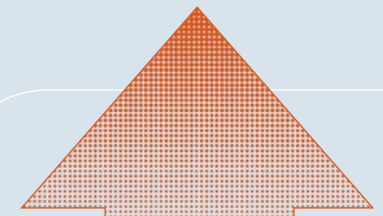
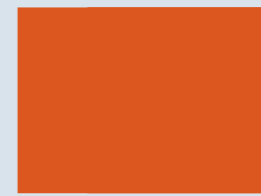
### 2 Designing and delivering a trustworthy process

- Step 1: Understanding and addressing worries about barriers and limitations
- Step 2: Deciding when to engage
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- Step 4: Choosing engagement methods

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- Phase 2: Analysing findings and evaluating responses
- Phase 3: Communicating and engaging around impact
- Phase 4: Reflecting and acting on stakeholders input
- Phase 5: Evaluation

# ABOUT THE FRAMEWORK



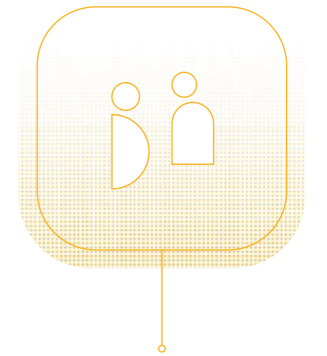
## Who is it for?

We created this practical Framework to help anyone designing products or services using artificial intelligence (AI), machine learning or algorithm-based data analytics to involve their stakeholders in that process.

You may be a small or large business, a civil society organisation, government department or civic institution of any type who wants to understand how to engage with stakeholders at timely points in software development process using AI. This could be as part of your broader human rights due diligence responsibility, AI human rights impact assessment, ethical assessment, risk assessment or compliance with similar processes and frameworks.

## Who developed it?

It is an output of the [Action Coalition on Civic Engagement for AI](#), part of a [Danish Ministry of Foreign Affairs Tech for Democracy Initiative](#), delivered by The European Center for Not-for-Profit Law Stichting (ECNL) and SocietyInside. The need for such a Framework was a finding of a separate project run by the European Center for Not-for-Profit Law Stichting (ECNL) and Mozilla Foundation with the aspiration of Making Trustworthy AI real (TAI).



# How was it developed?

The Framework is the result of a co-creation and consultation process involving over 150 individuals and groups from civil society, business and public service across the globe.

Participants in the process initially discussed the problems and barriers to engagement, and sought to capture broad ideals, existing knowledge and lessons from lived experiences from AI and elsewhere. This was supplemented by desk research (in part crowdsourced from participants) by the ECNL and SocietyInside. Engagement is not a new field and there are many examples of good practice in policy, healthcare, industry, academia and civil society to draw from. The distillation of this knowledge was presented for further deliberation with stakeholders during 2022. This is an interim document for wider consultation and piloting by our partner organisations. It is also a part of a larger piece of work from the Action Coalition inspiring organisations to consider human rights as the starting point for their risk and impact assessment.

Whilst this project is focused on meaningful engagement with AI, we have consulted others involved in engagement processes across other technologies, together with engagement specialists who work in multiple sectors. We understand that there is keen interest in the Framework for a variety of different technologies and contexts.



# The starting point for the Framework

Our work builds on the UN Guiding Principles on Business and Human Rights (UNGPs) which establish a global expectation of business conduct, with the goal of effectively embedding respect for rights and dignity for all people.

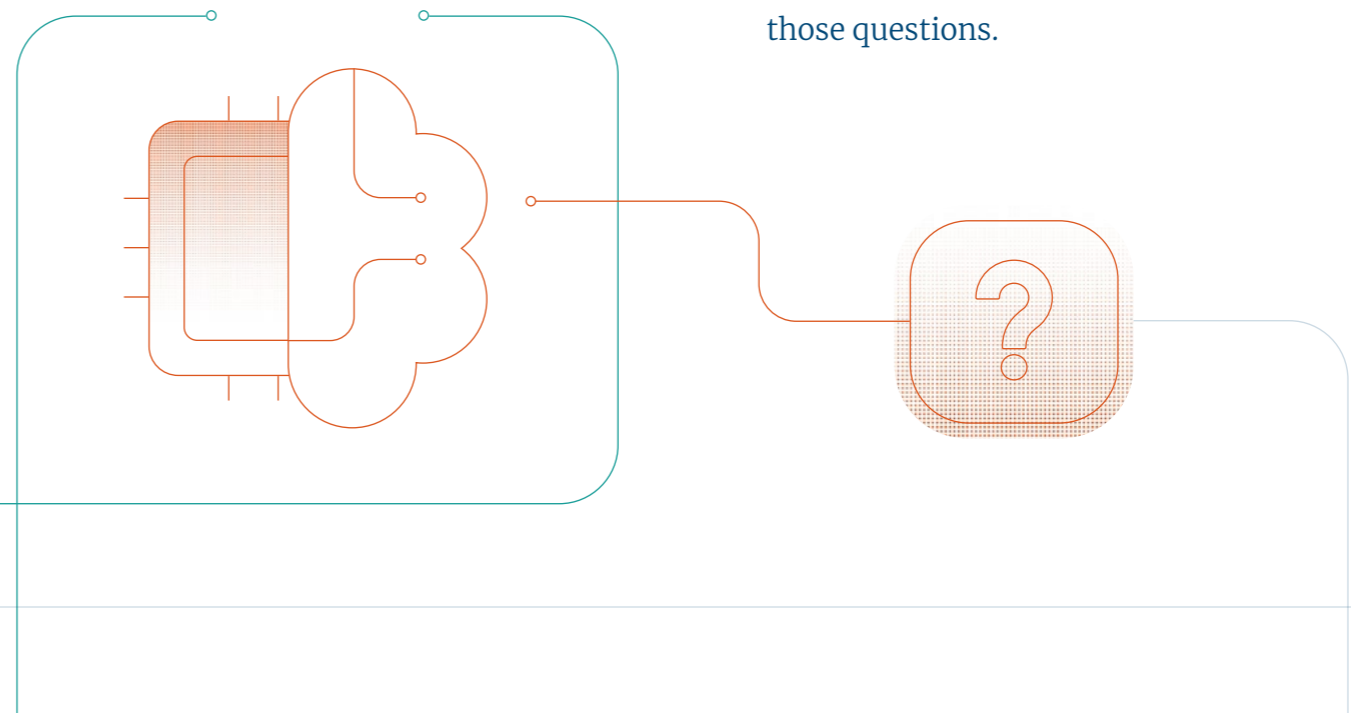


It is particularly relevant for products and services using artificial intelligence, because, as various stakeholders in our consultation told us, there is still not enough practical guidance on how to involve stakeholders in the design, development and deployment of AI systems. This is despite the numerous ethical guidelines, codes and “tech for good” commitments, as well as national and international obligations and laws enshrining the importance of involving stakeholders in AI development.

Both convenors and potential participants asked for clear answers to three essential questions:

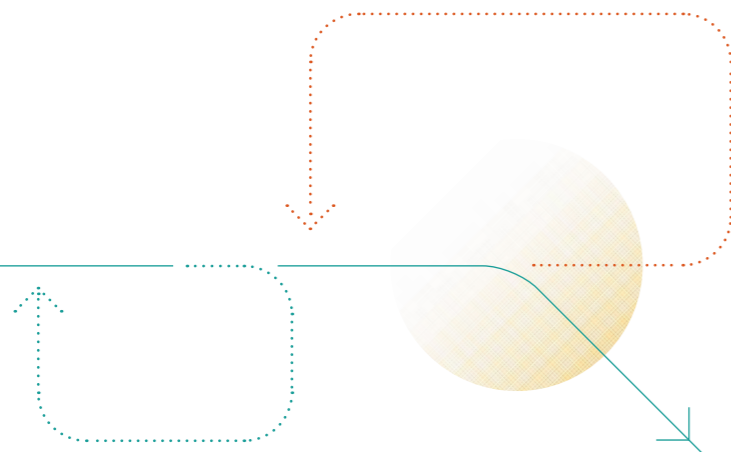
- 1 What makes engagement ‘meaningful’?
- 2 What does a trustworthy engagement process look like?
- 3 How to distinguish the meaningful from the meaningless?

This Framework attempts to answer those questions.



# About this document

It is designed to provide guidance for effective planning, delivery, action and feedback on stakeholder engagement.



## The document addresses several points:

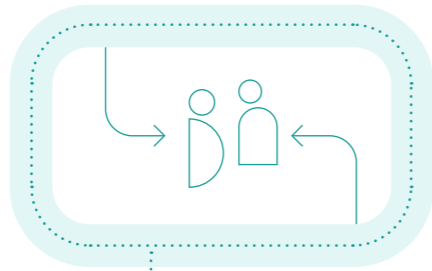
- Exploring what meaningful engagement might mean for convenors and participants.
- Providing guidance on how to design engagement to be meaningful for everyone – convenors, participants and those likely to be impacted by the product or service under design.
- Sharing insights and tools from our work and that of others for designing and delivering a Shared Purpose, Trustworthy Process and Visible Impact.

These toolkits will be refined following the pilot phase and the lessons learned will contribute to a final Framework and suite of online materials.

## The next phase will also include additional tools:

- A prompt sheet for engagement participants exploring what questions to ask, what evidence to reflect on and what it may be reasonable to expect from convenors to ensure the engagement is meaningful for participants and those likely to be impacted by the product or service under design.
- An outline evaluation tool to help engagement participants assess whether a potential engagement they have been invited to will be meaningful, or not. It will also help them evaluate the success of an engagement in hindsight.
- We also hope to attract funding to make online canvases and accessible training materials using the Framework and toolkits.

# Our aspirations for the Framework



## For convenors

Our aspiration is that those seeking to involve stakeholders feel more confident about its purpose, process and outcomes and therefore are more motivated to involve them and take their contributions seriously.



## For participants

Our aspiration is that CSOs and individuals feel, and are, better equipped and empowered to shape and contribute constructively to engagement with public sector, businesses, civic institutions and multi-stakeholder initiatives.

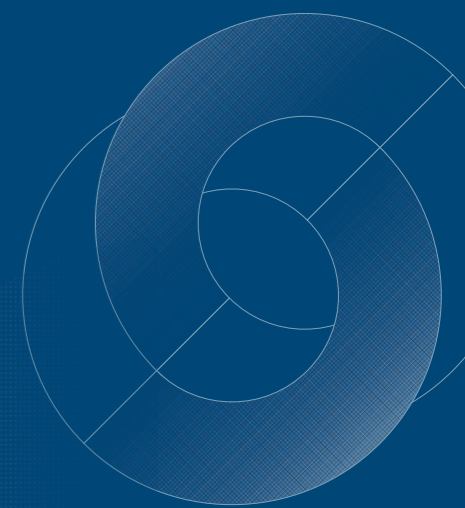


## For all

Our aim is to design a Framework which is motivating and accessible without the process seeming either so onerous that no-one wants even to start, or too 'lite' to be impactful. We want to ensure the tools are empowering and constructive to support co-creation and positive collaboration rather than inflaming confrontation and entrenching existing positions.



# ABOUT MEANINGFUL ENGAGEMENT OF STAKEHOLDERS



# What does engagement mean?

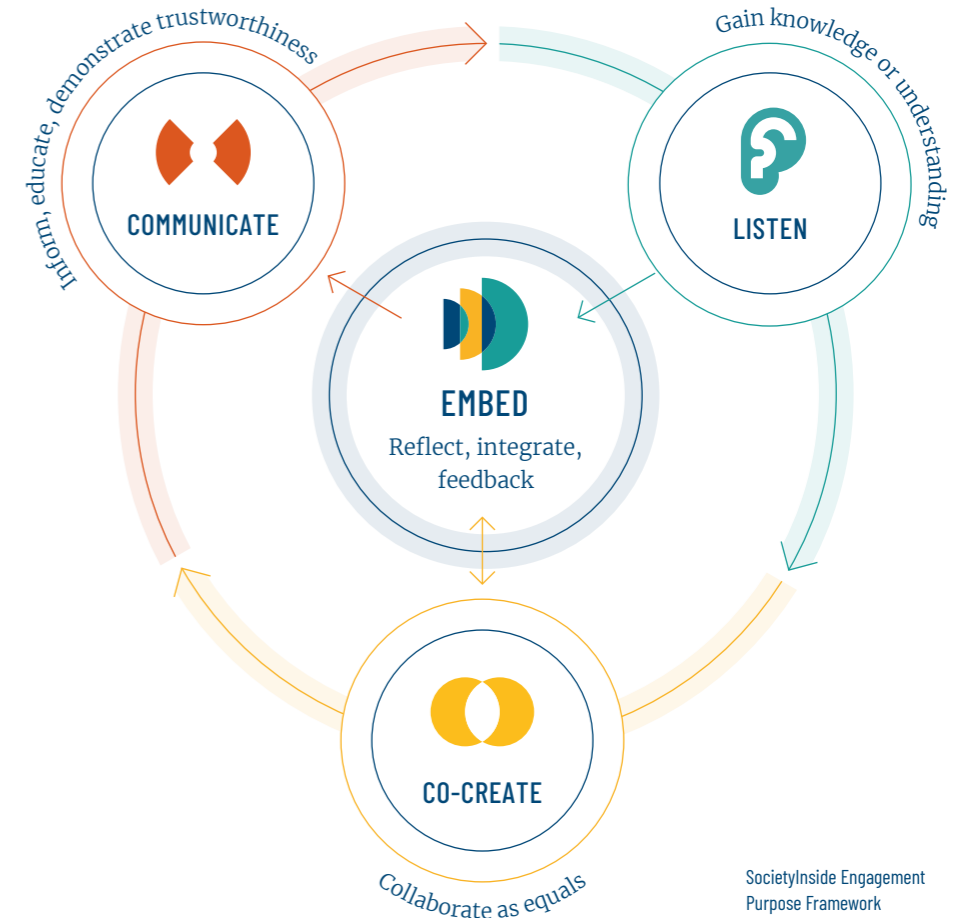
Organisations engage with their stakeholders usually for one of three purposes – to listen, to collaborate or to communicate.

Listening and collaboration are done to gain new knowledge to help achieve a specific purpose and help the organisation do what it does better. Communication can be part of that too, but the focus there is usually to inform or persuade others.

Stakeholder engagement usually refers to listening and collaborative processes where stakeholders have a meaningful influence on the decision-making of the organisation.

In the context of human rights impact assessments of AI systems, stakeholder engagement is particularly effective:

- A** To understand potential problems or opportunities in which products or services using AI, machine learning or algorithm-based data analytics may potentially contribute to improvement, or where it might not.
- B** To identify specific potential positive or adverse impacts, implications, benefits and harms of these products or services on people’s individual and collective human rights, especially marginalised and already vulnerable groups.



SocietyInside Engagement Purpose Framework

# Who is a stakeholder?

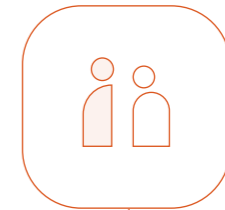
‘Stakeholder’ is the name for anyone who is influenced by, or has influence on, your organisation, its people, products or services. This can be a wide range of individuals, groups and institutions, including potentially the general public and society as a whole.

It is important to understand which groups and individuals within those groups are a stakeholder for the purposes of your engagement project. This process is called Stakeholder Mapping.

# What makes engagement with stakeholders meaningful?

The dictionary defines ‘meaningful’ as something “significant, important or purposeful”.

Our research identified 3 key elements which make engagement meaningful both for convenors and participants – these are a Shared Purpose, Trustworthy Process and Visible Impact.



# THE FRAMEWORK FOR MEANINGFUL ENGAGEMENT GUIDANCE FOR CONVENORS

The Framework assumes an organisation has identified a need to engage with its stakeholders but may need help to see what could be achieved, where to start, and how to do it. It encompasses planning, delivery, action and feedback, interpreted within the three elements of meaningful engagement.

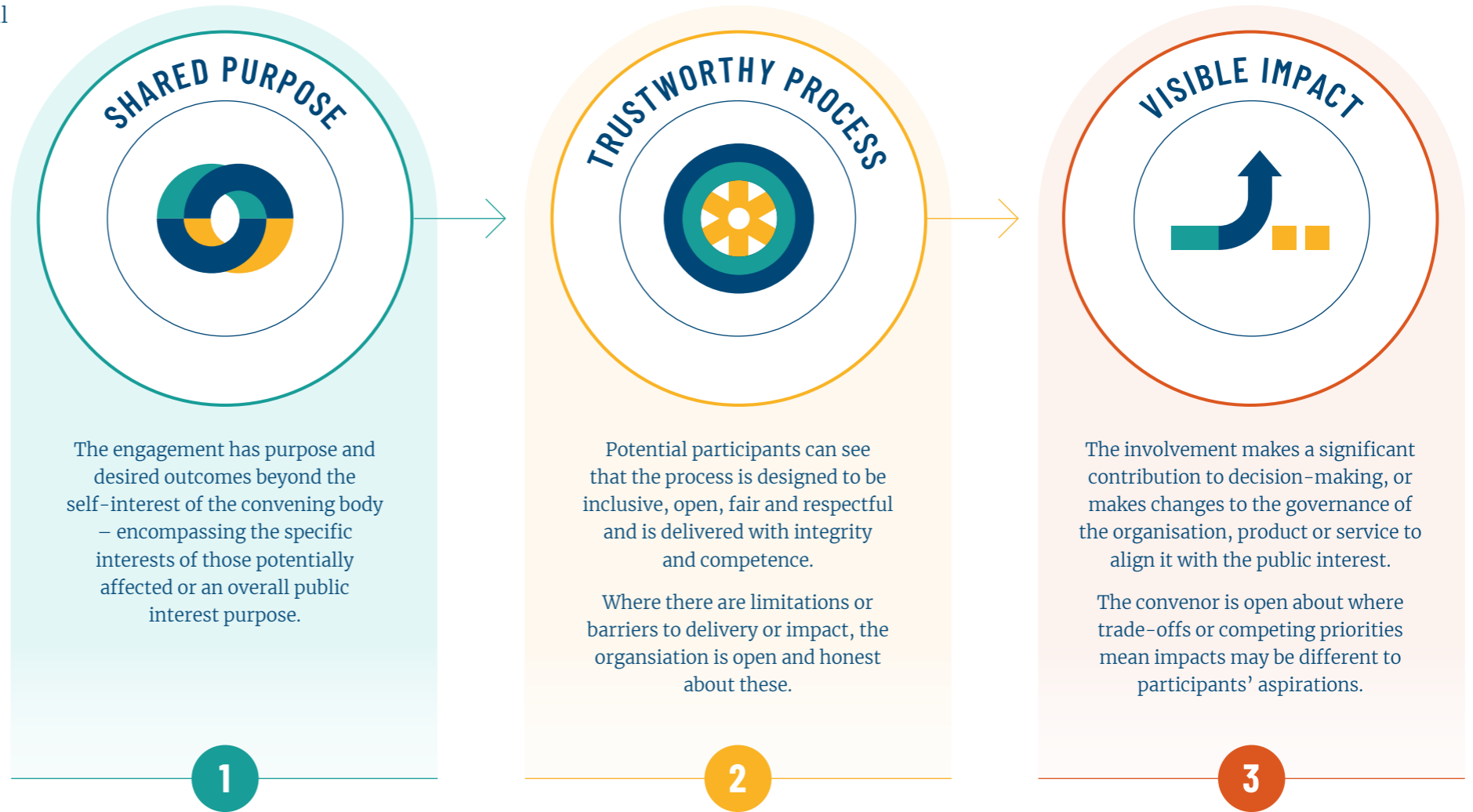
Convenors and potential participants asked for clear answers to three essential questions:

- 1 What makes engagement 'meaningful'?
- 2 What does a trustworthy engagement process look like?
- 3 How to distinguish the meaningful from the meaningless?

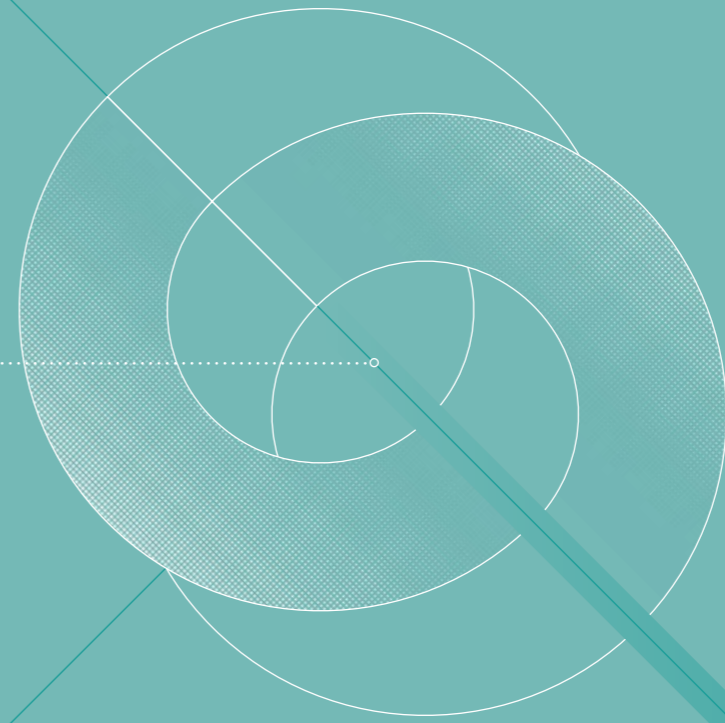
This Framework attempts to answer those questions.

# The three elements of Meaningful Engagement

This Framework for Meaningful Engagement has been developed around these three key elements.



# 1 Creating a shared purpose





Engagement must be considered meaningful by both the convening organisation and those participating. This starts with defining a Shared Purpose – one which goes beyond the pure self-interest of the convening body and encompasses the specific interests of affected stakeholders or an overall public interest.

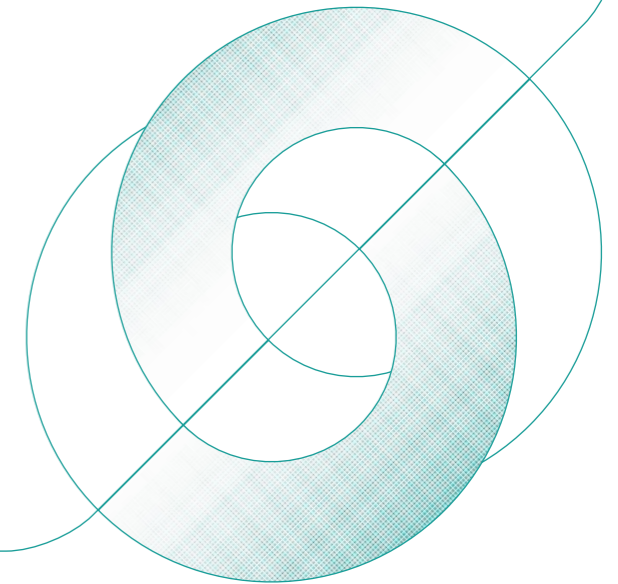


## Why is a shared purpose important?

Having a clear purpose, which is also important to participants, is the basis for meaningful engagement. It is the anchoring intent through which others judge the potential for meaningfulness for themselves or the public interest.

Clarity of purpose also helps you understand more precisely who you will need to involve, internally and externally, the appropriate timing and effective methodologies.

It is the basis for deciding on, and planning for, desired outcomes.





# Some possible purposes for stakeholder engagement

To understand which human rights and other real-world problems are appropriate for your AI driven approach to address.

To get a more informed view on how its use may affect people and their human rights – including how certain groups may be disproportionately affected even though other users remain generally unaffected or are only positively affected.

To consider if and how society as a whole may be affected by the product use at scale.

To help reflect on the potential for misuse and its implications.

To understand the environmental implications for the product in use and mitigations necessary.

To collaborate with those with expertise and lived experience to ensure concerns and rights of those most affected, particularly already marginalised and vulnerable groups are addressed from the start.

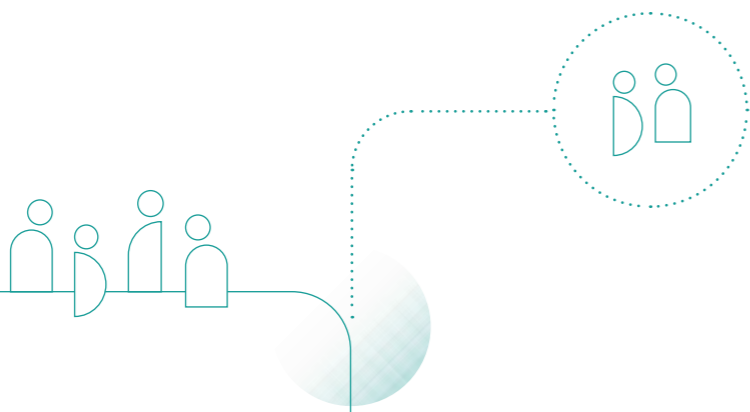
To avoid reproducing existing systems of power inequality.

To effectively assess whether given these conditions it is therefore appropriate to go forward with the product or services and what governance or modifications may be needed if so.

To understand how to measure positive impacts and ensure early warnings of unforeseen negative impacts in advance.



# Engaging internal and external stakeholders in defining purpose and outcomes



## Getting internal buy-in to outcomes

Designing a trustworthy process to involve the important internal stakeholders is a priority. It is most effective to work collaboratively from the start to define the purpose and agreeing desired outcomes and commitments with the many internal stakeholders. See [Getting Internal Buy-In Early tool](#) under Visible Impact.

## Find senior level champions

A board level champion is usually essential together with champions in key departments. For example you may wish to engage with product development, research, risk management, legal, finance, ethics, human rights, sustainability, communications, marketing, sales, human resources. Involving friendly outsiders, with different perspectives, is also very useful.

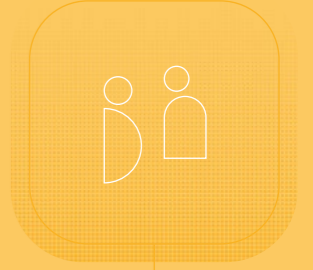
## Convene an advisory board

An advisory panel of internal and external stakeholders is very valuable and is most effective if it is convened as early as possible. Even before the purpose is clear, so they can help articulate that. This may be particularly helpful in a complex area such as the human rights impacts of AI systems.

## Involve external stakeholders

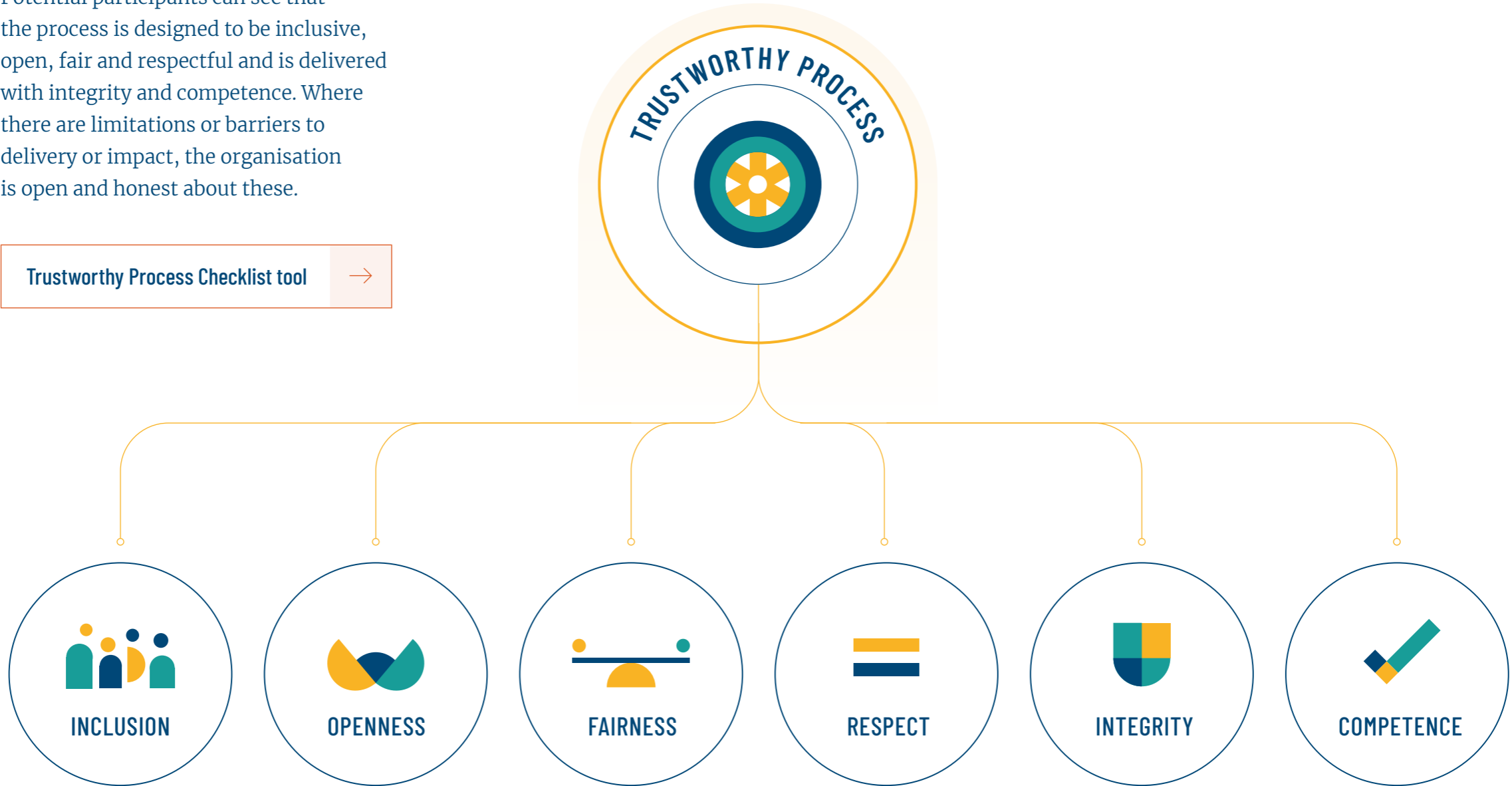
Particularly where organisations have existing relationships with external stakeholders, such as civil society groups and affected communities, it is valuable to involve them in the definition of your purpose and desired outcomes. E.g. involve them in brainstorming exercises, seek their input to drafts, involve them in the advisory board.

# 2 Designing and delivering a trustworthy process



Potential participants can see that the process is designed to be inclusive, open, fair and respectful and is delivered with integrity and competence. Where there are limitations or barriers to delivery or impact, the organisation is open and honest about these.

[Trustworthy Process Checklist tool](#) →





# Step 1

## Understanding and addressing worries about barriers and limitations

There is no such thing as a perfect engagement process or outcome. Each will have its barriers and limitations, some of which may not be obvious, or even foreseeable.

These might be constraints on overall purpose or outcomes, funding, resources, capacity, competence, knowledge, expertise or concerns about competitiveness issues. Or it may be that the trust of your potential participants has been lost for various historic reasons to do with your own or the sector's reputation, which may influence their inclination to contribute constructively. It is important to center the concerns and needs of historically and institutionally marginalised groups.





Honesty and openness are central to building trust in the process despite constraints. For example, if there are organisational or political limitations on certain courses of action, but you still need to understand what people want or need – say so in advance. Clarify what is and isn't possible before you start, any constraints on your ability to change decisions or products should be made clear and participants can then choose to engage or not.

But it is important to be clear about the commitments you are making. Be ambitious and genuinely open to change to ensure trust is not further eroded, either by misplaced expectation or timidity.

Consider also the possible constraints from the perspective of those you want to engage with – resources, psychological safety, concerns about their own expertise and positive or negative past experiences, for example. (See [Trustworthy Process Checklist tool](#))

Identifying constraints early is very useful. It could be part of an internal 'triage' process, or even part of the trust building aspects of co-defining, with stakeholders, your purpose, the introductory session or even the invitation to engage. It can also help both parties identify problems and respond appropriately before a vague concern becomes a real problem.

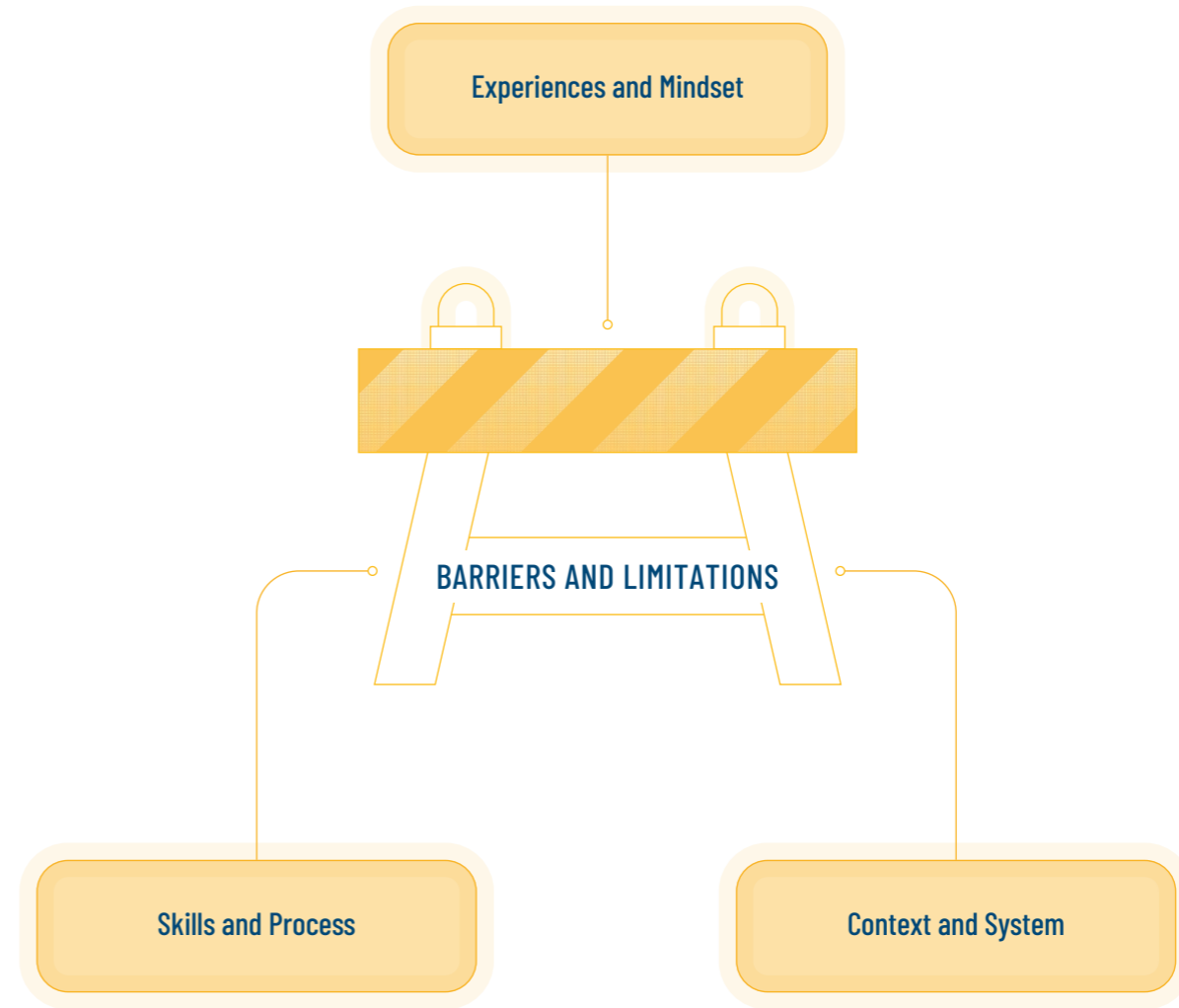
The [Barriers and Limitations tool](#) may help with this process.

**TOOL**

## Barriers and Limitations

- Use these or other prompts for internal brainstorming on barriers and limitation;
- Remember this is not about blame or shaming others for the current situation, or past issues, it is about surfacing problems and concerns honestly as part of working towards a genuine meaningful outcome;
- Even involve stakeholders in making these explicit as part of the process;
- Use them to underpin process design elements and process and impact commitments.

Please see the next page for examples.



## EXPERIENCES AND MINDSET

### Stakeholders

Why bother, nothing changes, this will be just another tick box exercise

They usually make no effort beyond the technical to help us understand

I never know what happens to my input, so is it worth it

They have all the power, they think they don't need us

### Developer

They are not experts, they don't know enough to be relevant

It will take twice as long, we don't have the time

They don't understand us, it will just open a can of worms

Whatever we do they just keep raising the bar



## CONTEXT AND SYSTEM

### Stakeholders

We don't have the resources

How do I manage my time and engagement with limited resources

The business model gets in the way, it is pointless in this system

There is no hard commitment to act on human rights harms so it won't be worth it

### Developer

We don't have the resources

The pressure to get the product/service out ASAP is serious and real

If senior management don't want it, it will be a waste of time

Suggested changes will be difficult to incorporate in light of the business model



## SKILLS AND PROCESS

### Stakeholders

How can we be sure that this process will make a difference to the things we care about and we won't just be ignored

I don't know enough about AI/HR, I will just look foolish

How can I tell a good engagement from a bad one?

### Developer

I don't know enough about Human Rights to not look foolish

I don't even know where to start

How can we be sure that they will take part in good faith and not try to derail or subvert the process?

I don't know what to do with their input

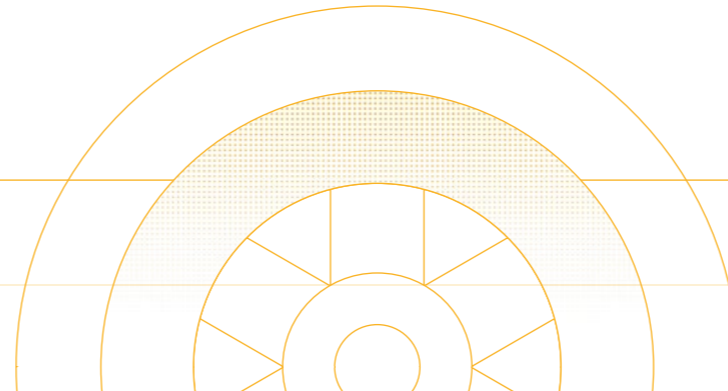
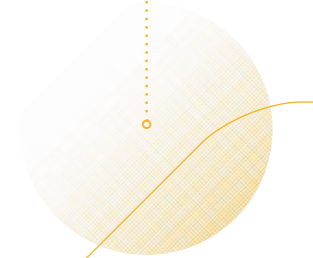
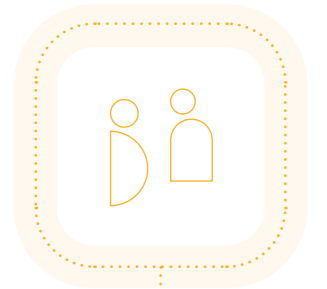




## Step 2 Deciding when to engage

Engagement is often seen as one-off event, but it may work best as a dynamic, iterative process that can have several objectives, involve different target groups and use different methods at different times. Once you have identified your purpose and objectives, you will be much clearer about when to engage different stakeholders.

To ensure that you are seriously taking concerns of external stakeholders, especially those from marginalised groups, engagement should happen where contributions can be most influential. This is not just about UX, (user experience) – “do people understand how to use our product the way we intend” – but involving them in shaping the intent behind it as well as its design, implementation and most importantly the implications and impacts of it in use.







## At what points do stakeholders need to be involved for the engagement to be meaningful?

When to involve stakeholders tool



- As part of internal discussions about product purpose and desired impact, often led by product managers?
- As a part of product design and specification, the products and services themselves are responsive to the concerns, rights and issues important to stakeholders, particularly those most potentially impacted.
- As part of dataset creation for developing the model (including training and testing the model), so that considerations related to biased and non-representative datasets are taken into account;
- Before deploying an AI system, to understand the potential implications of a specific use or application of the product on affected groups, especially those most at risk of harm.
- Ongoing during products in use – some negative or positive impacts can be a surprise – ongoing engagement is important to assess impacts in use and at scale.

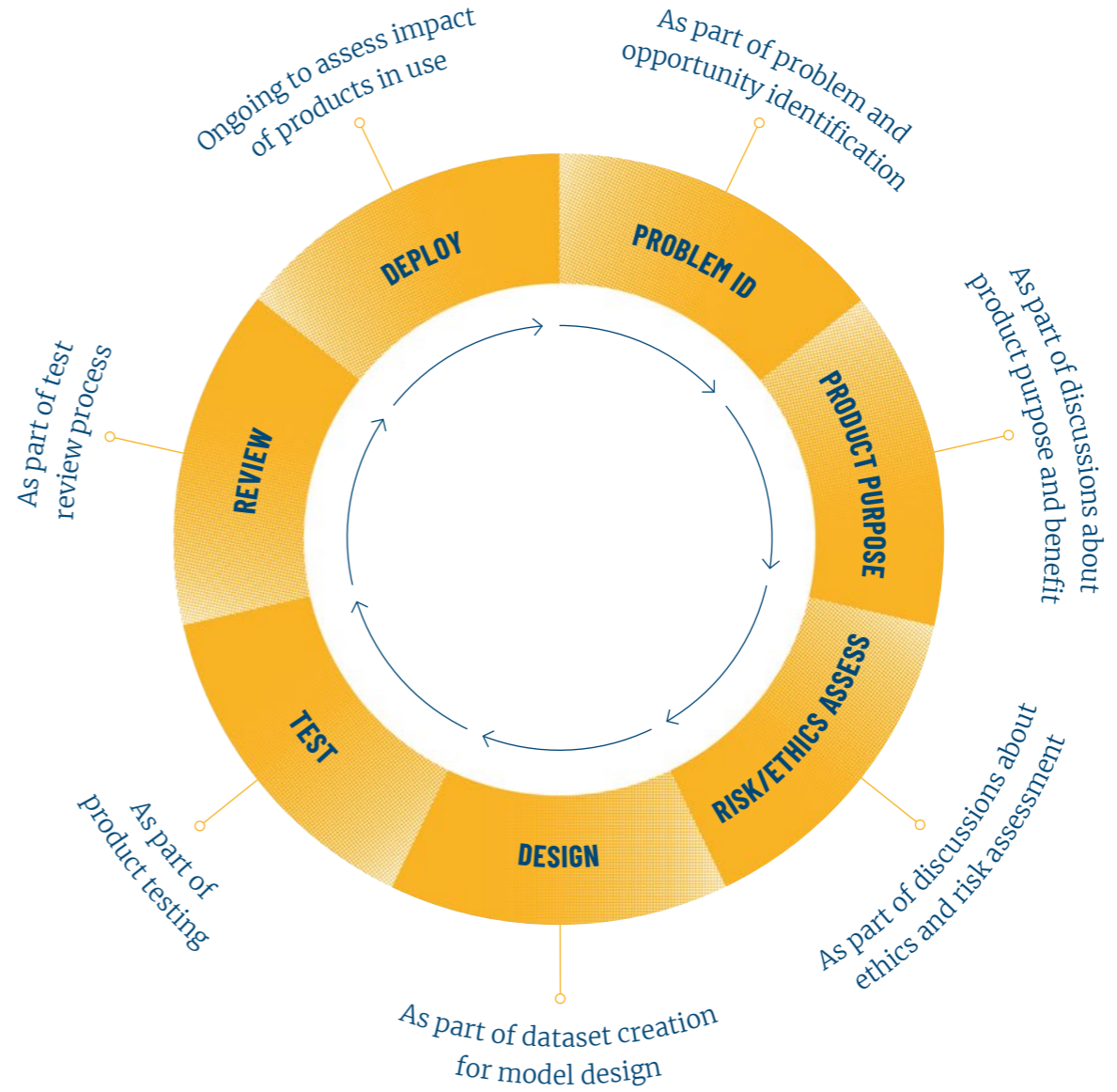
### **i** USEFUL TIP

It can be helpful to correlate this with your product development roadmap. Consider the milestone stages of the AI system's lifecycle and when you can benefit the most from the external input (don't forget to include 'Before we start!').



**TOOL**

# When to involve stakeholders in AI product development lifecycle?



# Step 3

## Deciding who to engage

Six tests for Stakeholder Identification tool



Deciding who to engage is usually called Stakeholder Mapping.

There are many ways of mapping the potential stakeholders you need to engage with – most often going down a list of shareholders, funders, users, customers, civil society organisations. But this can omit important stakeholders, such as affected communities and the general public, or society as a whole, who may or may not be users, who are often left out of the mix.

Because of this we are exploring a method of mapping which helps focus on the most impacted first and works outwards. This is more effective because it helps with *problem identification, stakeholder mapping and issue prioritisation* simultaneously.

Similar examples can be found in [this useful resource](#).



## TOOL

## Stakeholder identification internal 'triage'

If you have identified in the Shared Purpose phase those internal groups who are essential to a meaningful outcome, engage with them to understand who may be important to them to engage with. Otherwise convene an Internal 'triage' brainstorm now of the relevant groups in your organisation, who may have the necessary expertise to identify stakeholders.

You could brainstorm potential stakeholders in many different ways. One useful approach could be to design prompts as the starting point for the brainstorm. As in other phases, prioritising members of marginalised groups should be the guiding principle.

For example, these may be useful, adapted from the ['Six Tests for Stakeholder Identification' tool](#) from The Consultation Institute.

### Test 1: Who is directly impacted?

Whose daily/weekly lives will change as a result of this product or service. And how? What may be the consequences?

Who cannot easily take steps to avoid being affected by this?

Who will have to change their behaviour as a result of this?

### Test 3: Who is potentially impacted?

In particular circumstances, who will have a different experience as a result of this decision?

Are there individuals or groups who will have to adjust their behaviour if particular conditions apply?

### Test 5: Who has expertise on the subject?

Who has studied the subject and published views on it?

Who has detailed know-how that is needed for effective delivery?

Has anyone been campaigning about issues associated with positive and negative impacts and rights which may be affected?

Are there individuals or groups who are knowledgeable on the subject? Are there others in related worlds who may be perceived as knowledgeable – eg social media influencers

### Test 2: Who is indirectly impacted?

Whose daily lives will change because others have been directly impacted by this?

Who will gain or lose because of changes resulting from this?

### Test 4: Whose help is needed to make it work?

Who may understand the likely impact of this decision on other stakeholders?

Are there vital individuals or groups in the delivery chain whose help is needed?

Who if they obstruct the development will have a negative impact and why would they?

### Test 6: Who has experience relevant to his subject?

Are there individuals or organisations who have direct or related experience relating to impact?

Who would support or help the individuals or groups impacted?



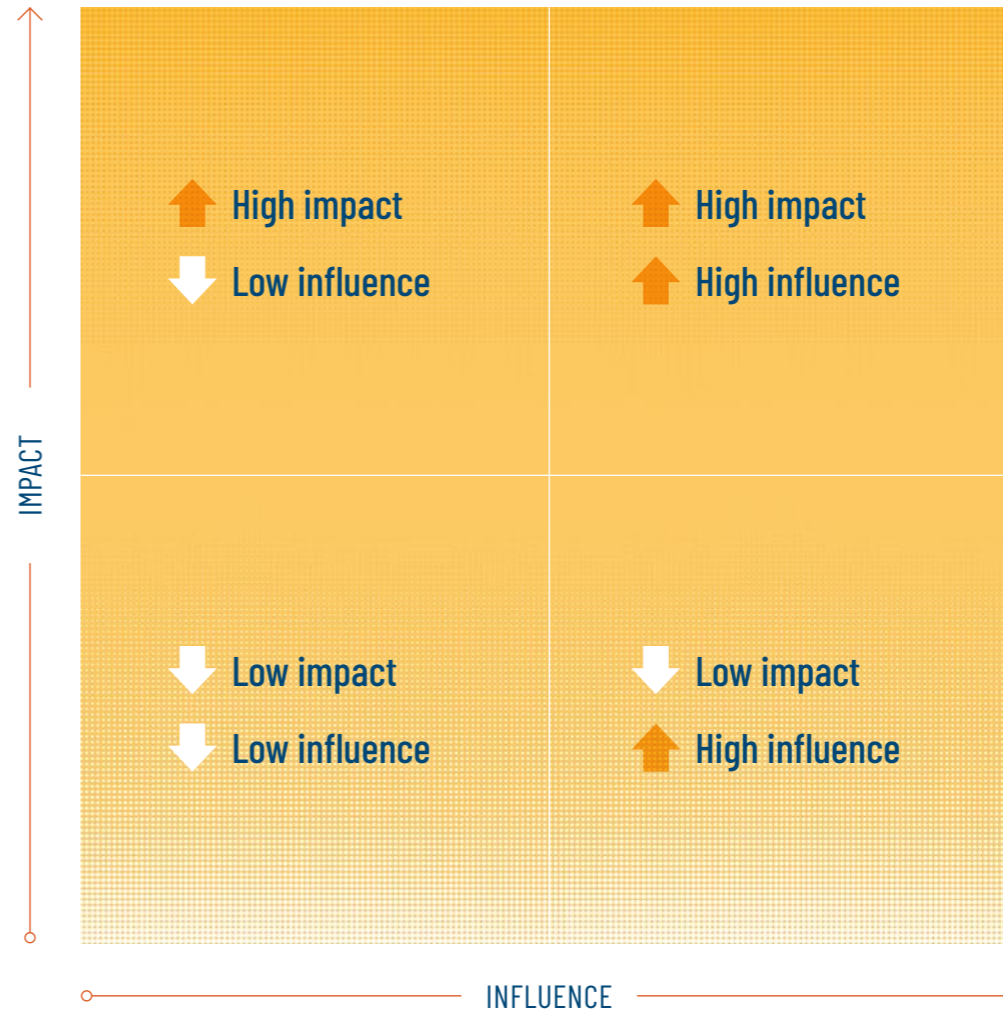


## TOOL

## Impact and influence mapping tool

You will be mapping different stakeholders by their Impact and Influence on this 2 x 2 map. You could have one large one, or a series by category which are later amalgamated.

For tips on using this tool, see next page.





## How to use

- Use the prompts from the Internal Triage process to think of the individuals or groups who may be affected. Plot them on the Impact and Influence Map.
- Map the individuals and organisations who are important for each of the stakeholders you seek to reach.
- Focus on those you believe to be the most negatively and positive impacted, especially those from marginalised and vulnerable groups such as women or racialised persons. Don't forget that the general public may be impacted as well as specific groups.
- Consider also those connected to these groups who might represent them or facilitate their engagement.
- You have initially thought through many potential positive and negative impacts. Who can help validate these and understand them better, as well as uncover new ones you haven't thought of?
  - Remember experience may be more important than expertise. So individuals with lived experience are also important, not only experts.
  - Don't think of stakeholders as potential blockers or barriers to be persuaded by your engagement, but as potential collaborators, or individuals with intel you desperately need. Remember negative views are gold dust, they may help you head off problems before they become disasters.
  - Proxies can be used to capture some stakeholder views. 'a Proxy' is a person or group of persons who can speak about the experiences faced by a particular group of people, but who are not actually these individuals or groups themselves. For example, proxies can include:
    - Representative organisations, which help a particular (and vulnerable) group;
    - Academics and researchers working on the particular topic;
    - Family members and carers;
    - More detail on considerations for including different types of proxies can be found [here on page 22](#).
- Individual citizens may be engaged for the expertise they have – eg their experience or context (as above). But when is it important to involve the public in general, even giving them agency in the decision?
  - When the technology may affect a large proportion of citizens;
  - When fundamental rights or societal values are challenged but the public interest may be served in using the technology;
  - When the technology potentially changes overall policy directions, eg policing, healthcare, etc.;
  - When a public policy decision is being made which requires the consent of citizens;
  - When understanding about societal values are needed to define what is acceptable and what is not.

For more on experience vs expertise see here: ['Why lived experience is a strength'](#)



“Designers tend to unconsciously default to imagined users whose experiences are similar to their own. This means that users are most often assumed to be members of the dominant, and hence “unmarked” group: in the United States, this means (cis)male, white, heterosexual, “able-bodied,” literate, college educated, not a young child and not elderly, with broadband internet access, with a smartphone, and so on.”

Design Practices: “Nothing about Us without Us” by *Sasha Costanza-Chock*





# Step 4

## Choosing engagement methods

### Linking purpose and methods

Research shows that people trust decisions when they can clearly see they have not been taken behind closed doors, but involving people like them, and with the inclusion of independent academic experts or civil society groups, critics and those standing up for marginalised groups rights and interests.

Engagement is particularly important when difficult decisions need to be taken, for example those in which competing rights or values can be in tension, or where tradeoffs are involved – such as deciding on whether to strengthen privacy or increase transparency – particularly those with serious implications for marginalised groups and wider society. By thinking creatively with affected communities, it often becomes clear that human rights are not in conflict, but instead interdependent and complement each other.

#### **i** USEFUL TIP

‘Nothing about us without us’, to borrow a phrase from the accessibility community, could be a great phrase to bear in mind when considering who, when and how to engage.

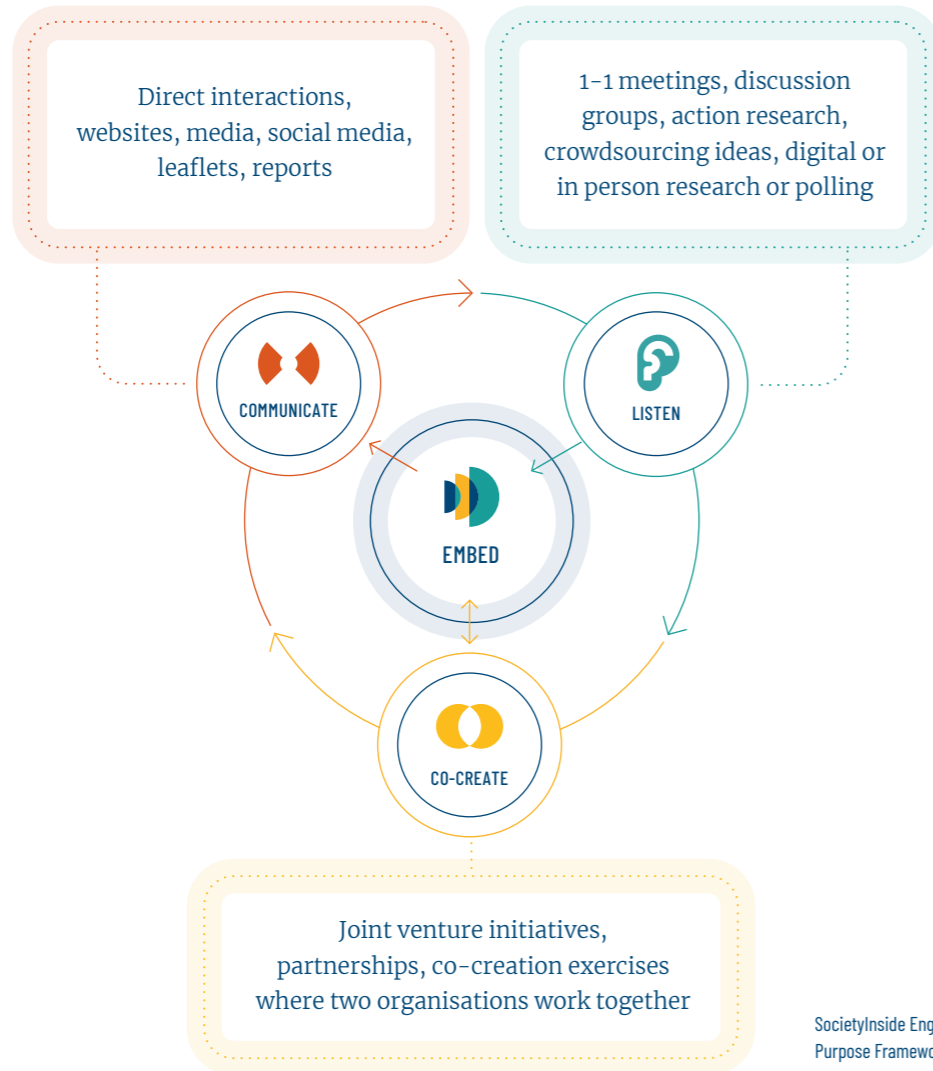
Listening, collaboration and communication will use different methods, so when choosing methods, it is important to reflect back on the following:

- A** The purpose of your engagement
- B** Who you want to reach for what reason
- C** How they can be best reached





## Some methodology examples



SocietyInside Engagement Purpose Framework

There are many methodologies of varying sophistication. Some will require specialist facilitation, others not, though in all cases experienced facilitators are important to ensure the smooth running of a competent process. In many cases facilitation by independent groups trusted by participants is recommended.

Co-creating the approach with some stakeholders, especially with those from marginalised groups, is particularly helpful so they can shape the consultation process and concerns about personal safety and privacy can be overcome together. Issues of power dynamics and accessibility to all stakeholders should be taken into account throughout the process.

The information given to participants in an engagement can itself be biased and skew the outcome unfairly. Involving stakeholders in materials design can help ensure these too are seen as fair, respectful and trustworthy.

Next determine which method most closely matches your needs, yields your desired type of inputs, and is feasible given your timeline and resources.

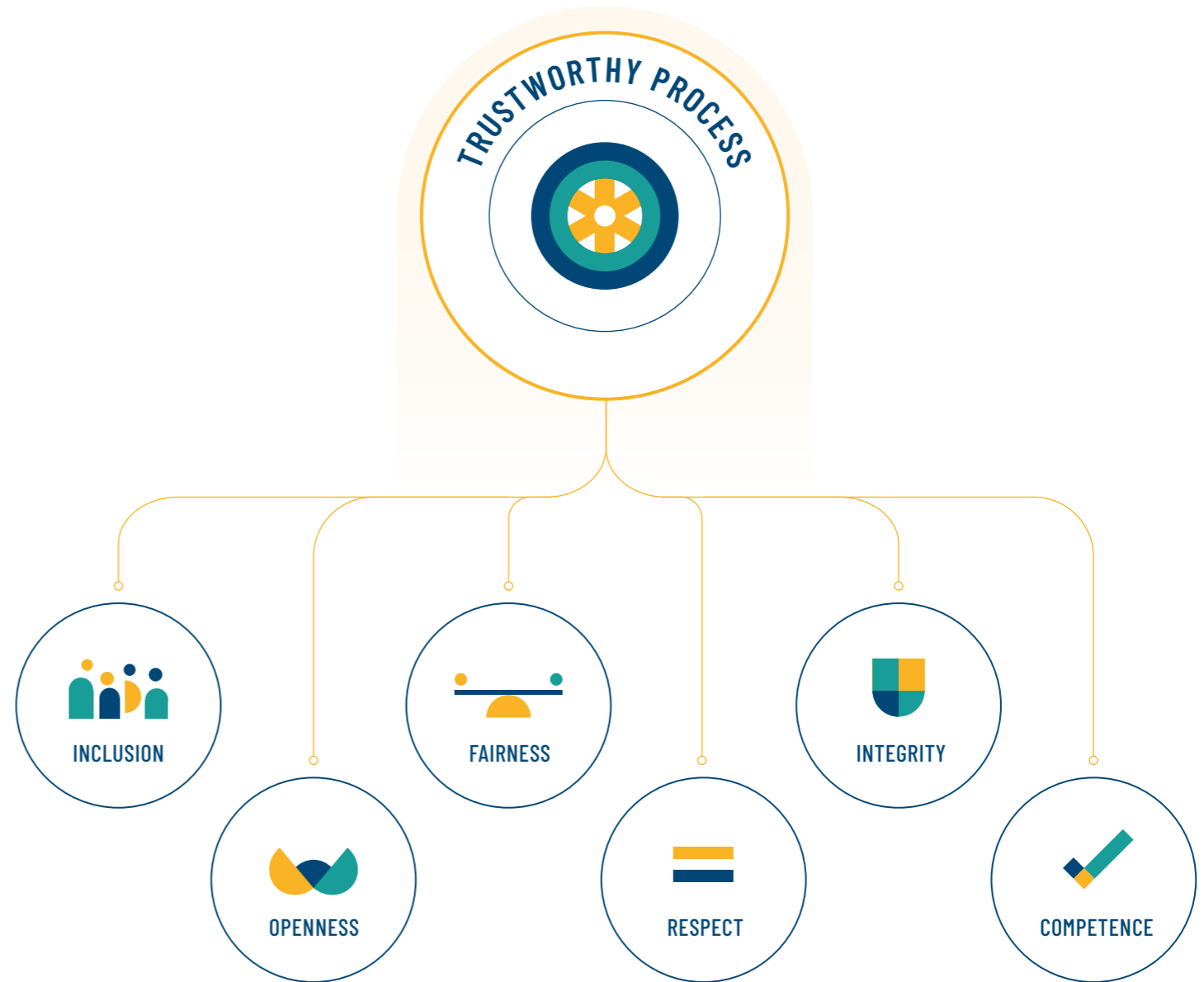
A comprehensive catalogue of engagement methodologies, with ideas of purpose, numbers of participants, timing and cost levels can be found [here](#) on the website of UK public engagement specialist [Involve](#).

## TOOL

## Trustworthy Process Checklist tool

Fundamental to meaningful engagement is the design and delivery of a process that participants and evaluators can trust. SocietyInside's [5 year research programme](#) into trust and governance identified the drivers of trust which are important for a trustworthy process. These are Intent (covered here by our Shared Purpose focus) Inclusion, Openness, Fairness, Respect, Integrity, and Competence.

We have used these to underpin all elements of the design and delivery of the process and have also created a checklist to cluster the aspirations, issues and concerns raised by our consultation process.





## Inclusion

- Are we broad in our inclusion of stakeholders, particularly those who may be most negatively impacted and those already marginalised and vulnerable?
- Are we clear that experience, not just expertise is valuable and are we seeking out contributions of all types?
- Some perspectives may be more difficult than others to obtain. Are we ensuring we just don't give up on a perspective because individuals may be hard to reach?
- Are internal and external stakeholders included in our deliberations about meaning?



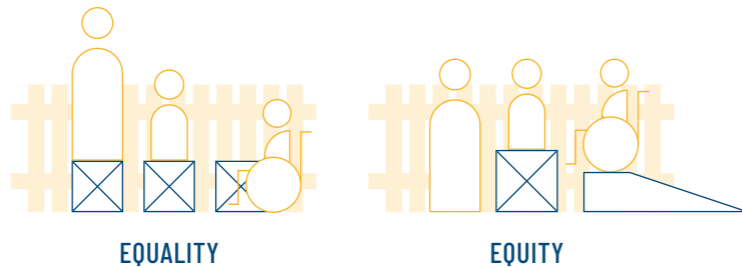
## Openness

- Are we open and honest about the purpose and proposed outcomes of the project?
- Are we open in process design and communication about the limitations to the process or the capacity for the project to make change within the organisation?
- Do we have an open mind which is ready to listen and take seriously all perspectives, especially those which historically have had less power and influence?
- How are we ensuring the process is open, with enough information and knowledge sharing to inspire trust, whilst also ensuring safe sharing and psychological and physical safety of participants, especially those who historically have been most disenfranchised and at risk of harm? (In some countries even attending meetings about human rights may be physically risky.)
- Are we committed to being open about unanticipated problems which may occur during the process and open to collaboratively devising solutions?



## Fairness and Equity

- Do we have a process of ensuring a fair share of voice in design and facilitation ‘Weighting’ participation to ensure fairness and equity of representation?
  - Equity-focused design goes a step further than inclusive design. It asks designers to focus on the needs of groups that have been underrepresented or ignored in the past or are particularly hard to reach. The goal of Equity-focused Design is to elevate the perspectives of individuals, groups or perspectives which have been excluded in the past.
  - Equity means providing a different level of opportunity and support for each person to achieve fair outcomes.



- Are we ensuring a fair share of voice in the process and ensuring that certain perspectives or voices do not dominate – both in choice of participants and meeting facilitation?
- Are the materials we provide unbiased and fair?



## Respect

- Are we involving people early enough for their perspectives to make a meaningful difference to issues which matter to them, or the people or issues they represent?
- Are we respecting people’s circumstances, by making the engagement at a time and place convenient for them, not just us? (This may also be about balancing the convenience for participants of online engagement with the perhaps higher quality of engagement which happens face-to-face.)
- Are we properly supporting and valuing people’s participation, eg with financial compensation for their time, travel to the venue, offers of childcare etc? Are we including civil society groups as well as individual citizens in remuneration policies?
- Is our approach and our materials culturally sensitive to the setting, context and individuals we are involving?
- Are we ensuring appropriate language support, eg translation in all its forms, facilitation which is impartial in its approach – eg facilitators and participants can be biased in terms of their responsiveness to those who share their race or language. How do we adjust for that?
- Are we ensuring we cut out jargon and use clear, plain language and provide materials which are accessible, without being patronising?



## Integrity

- Are we honest about how participants' feedback will and has contributed to changes in our project, product or service?
- Are we honest about where trade-offs and competing priorities mean that the impacts of the engagement may be different to participants' aspirations?
- Recognising limitations related to confidentiality and intellectual property/trade secrets, do we answer tricky questions honestly and openly?
- Are we unbiased in the design of our materials, ensuring we are not promoting simply our own perspective or emphasising only the positives of our potential approach?

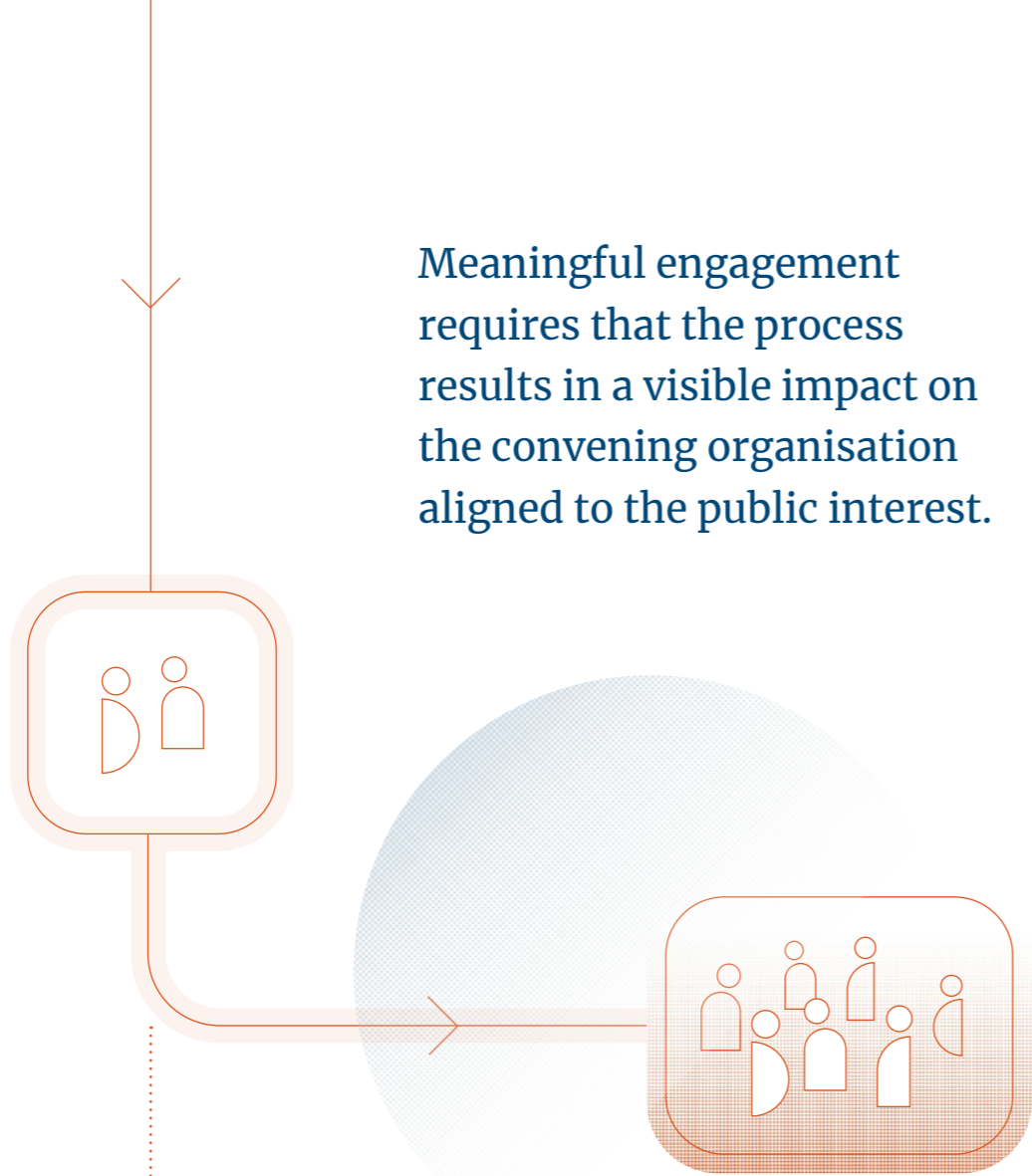


## Competence

- Do we have the resources and internal buy-in to deliver what we have proposed to participants?
- Do we have the necessary methodological design expertise? Do we know how to make our process interesting, culturally sensitive, involving and relevant, especially for non-experts in the area?
- Are we clear about what information and knowledge participants may need to have to contribute properly?
- Do we have the competence to listen and engage with those with diverse levels of expertise and values?
- Do we have competence in facilitation – would an independent facilitator be better to earn the trust of participants? Who might that be?
- What processes do we have in place to ensure participant privacy and physical and psychological safety? This is especially important for members of marginalised groups such as women and non-binary persons, racialised persons, migrants and refugees, as well as activists, political dissidents, and journalists. Useful resource includes consent forms for sensitive design.
- Do we have a process of evaluating success of the engagement by independent evaluators? Does this include evaluation by participants?

# 3 Demonstrating visible impact





It is made clear in process development how the proposed purpose is intended to contribute to changed decision-making, or changes to the governance of the organisation, product or service. The convenor is open about where trade-offs or competing priorities mean impacts may be different to participants' aspirations and any potential aspects of the public interest.

This is not a trivial task. We have divided it into five phases:

**Phase 1** Setting up internal buy-in →

**Phase 2** Analysis of findings and evaluating effective response →

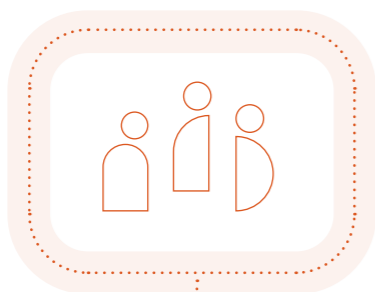
**Phase 3** Communication and engagement about impact →

**Phase 4** Reflecting and acting on stakeholder input →

**Phase 5** Evaluation →

# Phase 1

## Setting up internal buy-in early



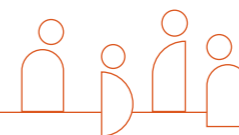
The stage of the process which defines the Shared Purpose is the best time to connect with internal stakeholders to get the buy-in of all the departments necessary to analyse and respond to the engagement findings, prioritise actions and resolve conflicts with other commitments.

Their receptiveness and buy-in will influence how you design, evaluate and present the findings to internal audiences. They may have to take action they are not expecting. For example, consultation can reveal that the key premise for AI development might be harmful, which would entail the need to pivot significantly from the originally agreed idea of the development. Therefore, it is critical to solicit the involvement of internal stakeholders at the earliest stage of the design process.

What is crucial is that you empathise with the people within the organisation who are likely to have to take action on findings. Much of this is hard, even when an organisation has a reasonably mature view of human rights or ethics within AI. Acknowledging this and being cognisant of it throughout the process increases the likelihood you can make change and actually engage with your stakeholders meaningfully to the benefit of all.

This phase is also important to consider decisions on who will respond to the stakeholders inputs and recommendations? What form will this take and when will it happen?

[Internal stakeholder mapping tool](#)



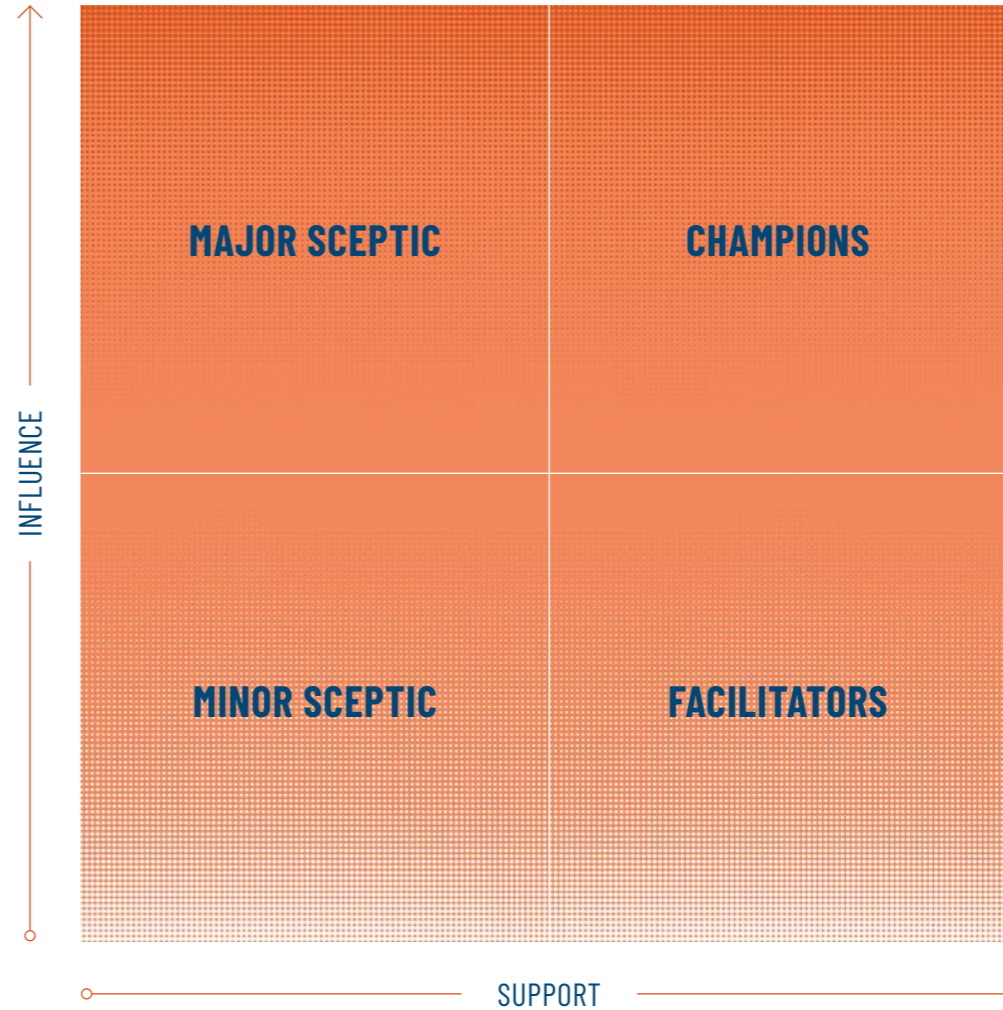


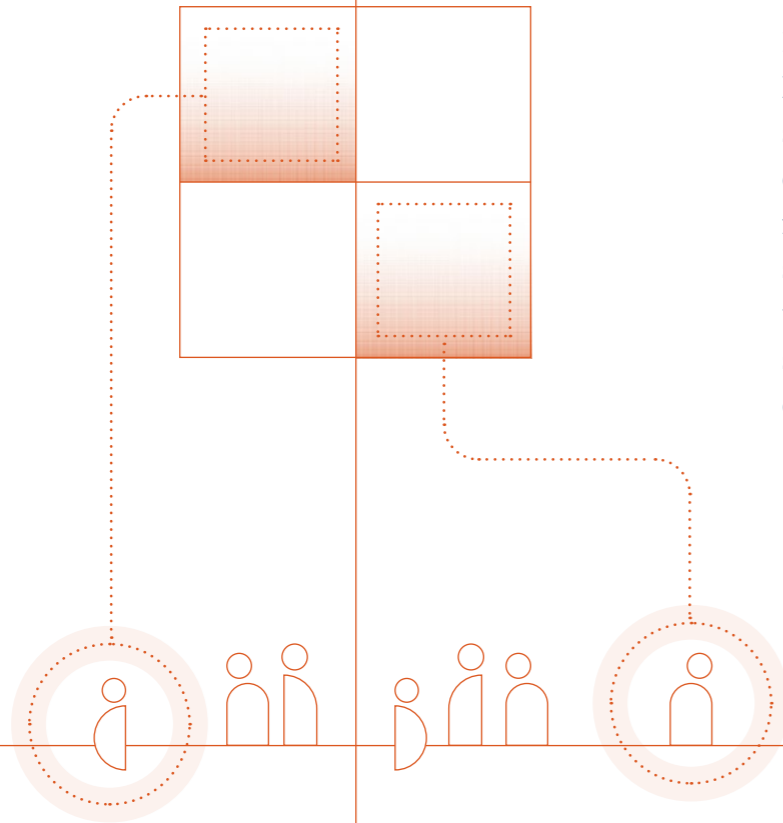
## TOOL

## Internal stakeholder Influence and Support mapping tool

At the beginning of your project, mapping out your internal stakeholders and understanding their current context helps you to understand how you can help them and them you.

This might involve using an empathy mapping tool, such as the Influence and Support map opposite, which considers the influence the stakeholder is perceived to have within the organisation and their level of support stakeholders will have for the changes that come out of the engagement.





It could be stem from insights from the barriers tool in earlier section or used to inform that process and both together augment your understanding of internal dynamics amongst your stakeholders and their capacity to support the potential changes which will be needed.

It involves relating directly to the incentives and lived experience of the people who are tasked with solving specific problems and making the everyday decisions in designing, engineering and deploying machine learning and AI based products and services. You might consider the cross functional teams with UX designers, software developers, data scientists and product managers as well as legal, ethics, compliance and marketing teams.

Great care must be taken with populating this map in such a way that it is respectful of all individuals and their incentives, context and lived experience within the organisation. This exercise and any direct internal engagement must, as with any stakeholder engagement, listen to and take seriously all concerns and issues and respond openly and respectfully. You must also be open to the fact that they may be right and you not. Nobel Prize winning economist Daniel Kahneman gives the wise advice “don’t try and persuade, understand the source of resistance and address that.”

This gives you an indication of 4 change agent personas and helps you develop strategies and tactics for communication, planning, resourcing and facilitation needed to embed the needed changes, while also empathising and acknowledging people’s organisational context.

### Major Sceptics

↑ High influence + ↓ Low support

These are people who hold significant influence in the organisation that have skepticism towards applying human rights in the context of AI powered products and services. During the initial phase of internal stakeholder research, you should aim to get an understanding of the cause of their skepticism. It can be because they hold different values or identify different priorities, lack of concrete evidence there are issues, or it can also be more related to the conflicts they see with the profit commitments of the business and reconciling business needs with the need to respect and follow through on commitments to human rights or the environment. In any case, identifying the cause of skepticism and resistance and mapping this out helps to understand and where necessary pre-empt and address the forces hindering positive change later.

### Minor Sceptics

↓ Low influence + ↓ Low support

People internally that are identified as minor skeptics may not hold a great deal of overall influence in the organisation, but their skepticism may still have influence. This group should not be ignored, particularly if you find a large number of these people exist. In aggregate they can influence the organisation and can hinder change when their concerns have not been fully understood their perspectives heard and issues adequately reflected and addressed.

### Champions

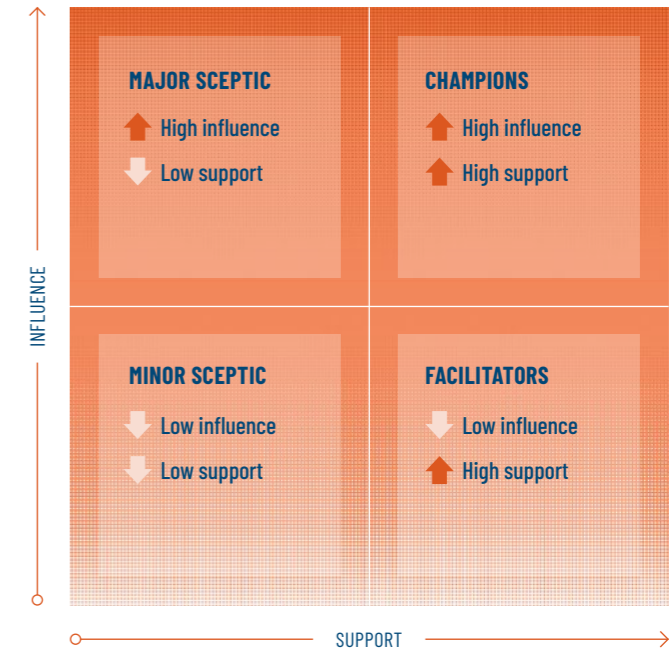
↑ High influence + ↑ High support

Champions openly communicate their support for doing this work. Identifying them at the beginning of the engagement project helps to later leverage their influence and bring about positive change throughout the process. They will usually be the ones to advocate at the start and also enrol others around them in any changes that might come.

### Facilitators

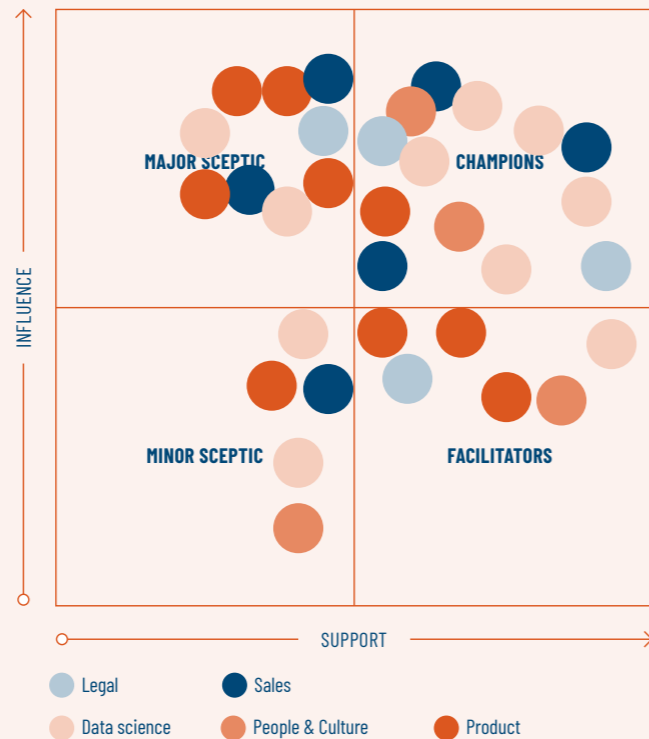
↓ Low influence + ↑ High support

People identified as facilitators may not hold much overall influence in the organisation but because they are in full support of the project they are strong change allies. Identifying them early and involving them as much as possible to advocate for this work is crucial, particularly if they are numerous.



### **i** USEFUL TIP

Using a visual tool can help map these out and colour code them based on functions as in the example image:



With this in place from the start, responding to engagement and any findings becomes easier. By obtaining a better understanding of their perspectives, listening and responding to their concerns, you are able to pre-empt resistance and formulate strategies to communicate and further engage stakeholders in catalysing positive change.

It is possible, even likely, that external stakeholder engagement will surface findings internal stakeholders will not want to hear. This can be because there will be significant financial or resource implications, it might mean more effort and work to remediate from already stretched teams and devoting resources to address it might be out of scope/budget. Or their jobs may be on the line because of issues uncovered by the engagement. So respect and psychological safety to openly work through scenarios like this up front is essential.

Asking people to change their behaviour, especially when this may conflict with their values, incentives and views of what is important, is a big ask. The evidence for change must be strong, well articulated and supported. This is not a trivial task.

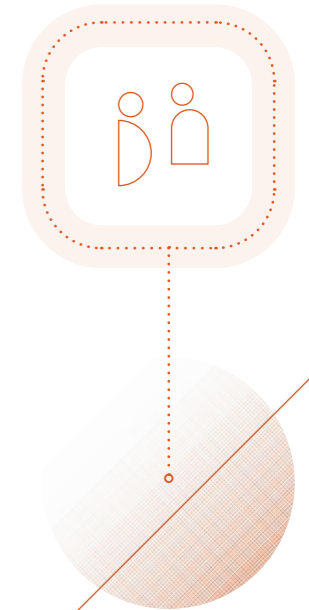
## Providing evidence of commitments

Wherever possible outline clear commitments or pledges to resolve issues you've identified. A tool like Pledgeworks may be helpful and the involvement of internal stakeholders essential.



Involving external stakeholders can also be helpful and this cocreation process can be used to publicly signal commitments to change. When open and transparent representation of these pledges is made, it rallies internal stakeholders around the activities they believe are needed. These commitments can be shown on public facing parts of an organisations website and also incorporated into product and project management tools used internally. Embedding commitments teams have made in people's workflows and providing evidence internally and externally helps to demonstrate your organisation is worthy of public trust.

These tools and this process should also be shared with stakeholders as part of demonstrating a trustworthy process.



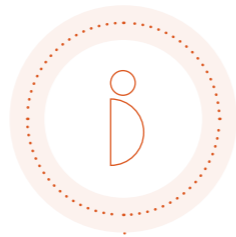
## Phase 2

# Analysing findings and evaluating response

This internal mapping will also identify who will be involved in the analysis phase of the engagement outputs.

This will be a complex process and will require allocation of resources in a number of areas. The internal stakeholder mapping will be essential to identifying the types of analysis needed and who will do them. For example you may:

- Analyse findings by different internal departments – product design, engineering, legal, ethics, etc.
- Analyse findings in terms of business model or other existing conflicts or tradeoffs.
- Analyse findings in relation to opportunity and risk / harms and the resulting actions and trade-offs.
- Evaluate which policy and design decisions on which issues or suggestions from the findings will be accepted and /or included into the design features or process. Deciding which will not and why.
- Deciding and being honest and open about the reasons for not accepting and/ or including input or suggestions from the findings into the design features or process.
- Documenting these decisions about the use of engagement findings for internal and external Communication.
- Developing a communication and further engagement strategy and designing implementation.





# Phase 3

## Communicating and engaging around impact

What makes engagement meaningful for participants is to know that their contribution has been taken seriously and their perspective has had an influence on the outcome of the initiative under discussion.

In particular that their participation has upheld the public interest and had a positive impact on those most likely to be negatively affected by the product or service in use.

Where trade-offs and competing priorities mean impacts are different to participants' hopes or expectations, the rationale is explained – e.g. when the product can't be modified to reflect recommendations from the stakeholder engagement because of competing priorities – the reasons for not acting on the recommendations will be explained.

Research shows that people don't expect their every view to be necessarily incorporated, but explanations as to why they are not incorporated are pivotal in building trust in the process and outcomes.

In developing your communications plan you may consider these questions:

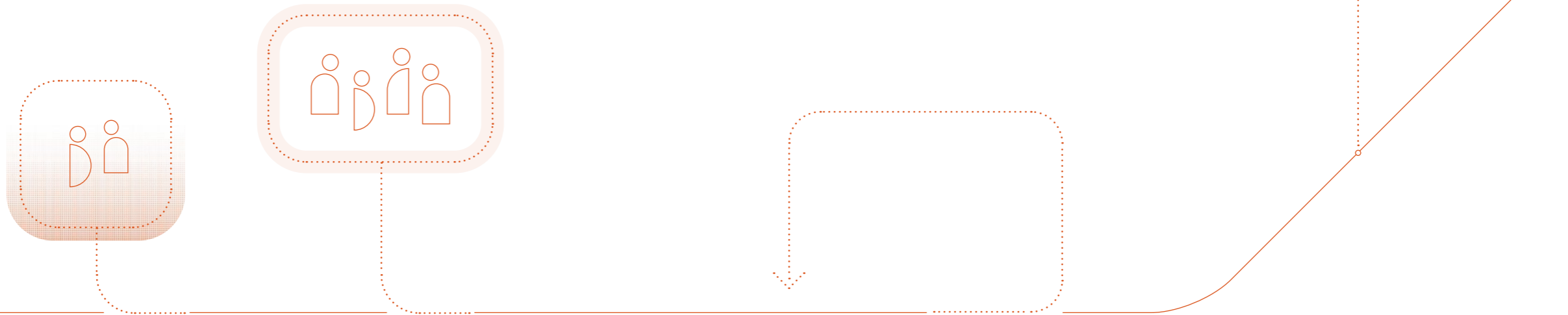
- How are you planning to give feedback to participants about the impact of their contribution on the project under discussion?
- Where this may be different to expectations, how are you communicating the trade-offs and priorities behind these decisions?
- How are you planning to record and disseminate internally their response to your decisions? How will that further influence your decision making?
- How are you planning to involve them further as your project evolves? How are you planning to give further feedback when product or services have been amended in the light of their engagement?



# Phase 4

## Reflecting and acting on stakeholder input

- After you communicate information about their input, stakeholders will have further views about your response and about the changes you made and didn't make.
- Their feedback at this stage may also provide new insights and illuminate new courses of action.
- It is advisable that a second phase of internal communication and reflection be conducted at this stage to inform any changes needed before final deployment.





# Phase 5 Evaluation

Draft Evaluation tool



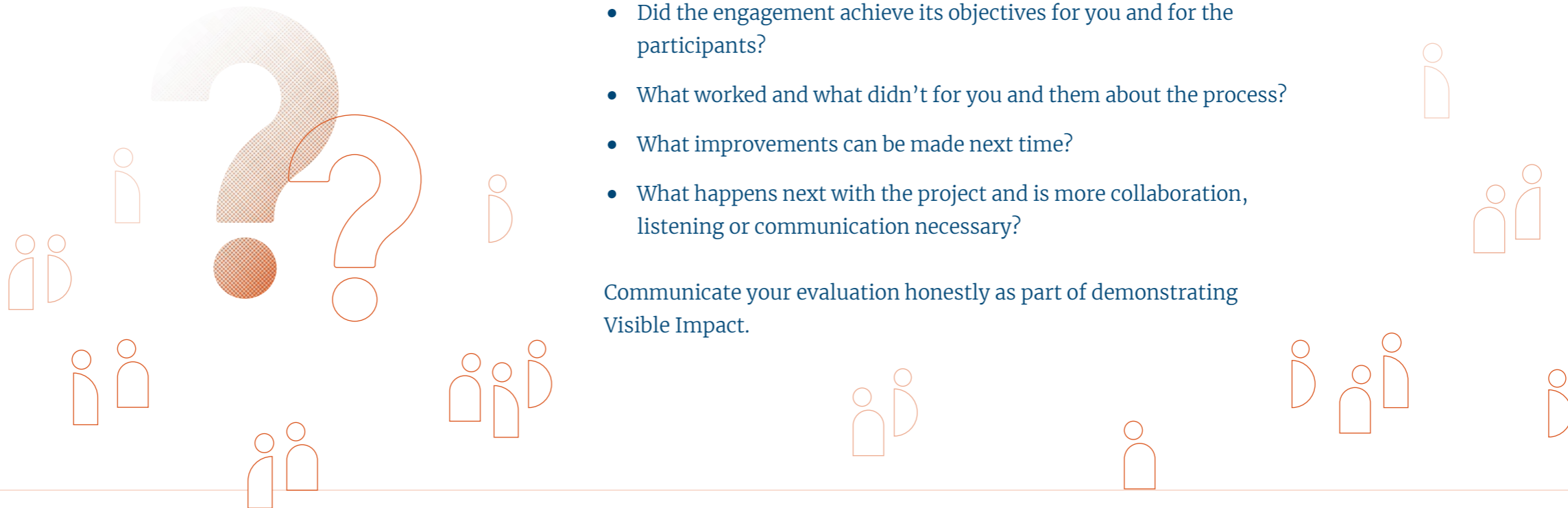
## Possible evaluation questions

Meaningful engagement undertakes evaluation which includes evaluation by participants. Feedback forms are now ubiquitous and widely disliked – be creative about getting feedback from participants but keep it short. Ensure it can be anonymous, or not, if they desire it.

### Consider:

- Did the engagement achieve its objectives for you and for the participants?
- What worked and what didn't for you and them about the process?
- What improvements can be made next time?
- What happens next with the project and is more collaboration, listening or communication necessary?

Communicate your evaluation honestly as part of demonstrating Visible Impact.



## TOOL

## Draft Evaluation Tool

The Framework can be used for evaluation in two ways:

- To help civil society to assess whether to collaborate in an engagement initiative in the first place;
- To evaluate its effectiveness and success retrospectively.

Figure shows a possible mapping tool and process for evaluating success in a deliberative approach.



## Appendix

# Framework development process

- 1 [Initial mapping](#)
- 2 [Identifying barriers and challenges to meaningful engagement](#)
- 3 [Consolidating input on understanding and addressing barriers part 1](#)
- 4 [Consolidating input on understanding and addressing barriers part 2](#)
- 5 [Live development canvas including references to others' work](#)
- 6 [Initial draft framework](#)

## Acknowledgments

We thank a wide variety of individuals and groups who participated in providing input and suggestions for this Framework, in particular, those taking part in the Mozilla Foundation Trustworthy AI Working Groups and Action Coalition on Civic Engagement for AI, part of a Tech for Democracy Initiative.



Need some support in taking this  
Framework from intent to action?  
**Reach out.**



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