European
Artificial Intelligence
& Society Fund

# Impact report: Insights from our grantees

European AI & Society Fund

October 2023

#### Introduction

European AI & Society Fund grantees work to shape Artificial Intelligence to better serve people and society. This report provides insights into the strategic capacities, impact, challenges and learnings that our grantee partners have shared in their reporting. It includes organisations who began their work in 2021 after being awarded grants through our first Open Call for proposals: Access Now, ANEC, AlgorithmWatch, European Digital Rights (EDRi), European Network Against Racism (ENAR), European Sex Workers' Rights Alliance (ESWA), European Patients' Forum, Friends of the Earth Europe, Foxglove, Glitch, Health Action International, The Irish Council for Civil Liberties (ICCL), Mnemonic, Moje Państwo, Panoptykon and The Platform for International Cooperation on Undocumented Migrants (PICUM).

Our grantees from our 2022 Open Call have not yet provided written reporting and so are not included in this report, but many are active participants of joint coalitions and ecosystembuilding activities.

The reporting took place in April 2023, shortly before the European Parliament voted on its position on the European AI Act, a development important to the impactful policy and advocacy work of many grantee partners described in this report. At the time when this summary report was written and published, the outcome of that vote was already known, and we have taken that into account when describing policy outcomes on the AI Act.

This document synthesises grantees' reflections and organises them in line with the European AI & Society Fund's Strategy and Monitoring and Evaluation objectives and indicators.

#### Key findings

- Grantees have all achieved significant increase in capacity thanks to the funding across policy, technical and communications skills.
- Technology expert organisations have been able to sustain policy and advocacy work through complex legislative processes in the EU and national levels as well as engage in new forums such as the Council or Europe.
- Social justice expert organisations have succeeded in bringing the views of affected communities such as migrants, sex workers and racialised communities into policymaking and have effectively addressed the intersection of AI with issues such as health.
- Close collaboration among grantees scored tangible victories in the AI Act with the European Parliament adopting civil society positions on biometric identification, emotion recognition, predictive policing and human rights assessments among other issues.
- Grantees have been able to engage across a number of other files including the Digital Services Act, the AI Liability Directive, the European Health Data Space, the Platform Workers Directive, the EU Employers' Sanctions Directive.

- Funding has had a multiplier effect as grantees engage on AI issues within their wider networks and establish clusters across different thematic fields.
- Grantees require sustained funding over time in order to follow changing legislative priorities and for their expertise and credibility in the field to grow and be recognised by decisionmakers.
- Despite their increased capacity, challenges remain to engage consistently on policy work across a large number of files and in the face of intense and well-resourced industry lobbying.
- Grantees remain concerned about funding levels over the medium to longer term.

# Creating the capacity and skills to effectively engage and secure tangible impact on policy around AI

Our ecosystem is composed of diverse organisations, and their previous experience with working on AI also varies. We noted that organisations, therefore, have taken different approaches to capacity building that best fit their theory of change, objectives, groups that they represent and missions they have. These included increasing policy expertise, acquiring technical skills as well as communications and outreach.

All grantees report that the funding has allowed them to add entirely new capacity or significantly grow existing internal capacities to work on AI, enabling new research and advocacy activities. Many have hired for new roles with specific expertise (such as AI Analyst, Technology Fellow), as well as policy and community engagement roles. Some have contracted specialist consulting services (strategic and political communications, topic-expertise, research) to deliver specific outputs, such as press engagement, mapping of AI-related harms or publishing of full-length reports in the support of their advocacy activities.

Many focused this increased knowledge and capacity on EU legislative processes and advocacy. Organisations developed briefings and policy papers, engaged with relevant stakeholders, participated in workshops/events and built on existing knowledge and experiences. **Mnemonic** highlighted that it grew its capacity as part of the Digital Service Act (DSA) Human Rights Alliance. But the increased capacity also enabled engagement in wider political forums. For example, **AlgorithmWatch** could co-coordinate the inputs of civil society organizations on the negotiations of the Council of Europe AI Convention<sup>1</sup>, negotiations which often fly under the radar.

Some organisations focused capacity building on creating specific technical expertise. The Irish Council for Civil Liberties (ICCL) hired a highly skilled Technology Fellow, allowing ICCL to gain access and influence by providing legislators with the expertise in a form that they cannot find elsewhere, notably, outside of the industry. Moje Państwo was able to recruit an AI Analyst and provide expert input with evidence and concrete policy recommendations to various policy and legislative files, including the AI Act, Council of Europe AI Convention, EU Data Act and others. Through this process, Moje Państwo built a strong team of experts and know-how around AI policy solutions that are practical and relevant to current technological and social challenges.

Organisations also increased capacity in public and media outreach (Mnemonic, Panoptykon), while PICUM highlighted improved communications to their key audiences about AI, tech and migration and AlgorithmWatch focused its campaigning on a national level campaign on regulating biometric recognition in the AI Act. Multiple organisations reported that they are investing capacity in making sure that public and their audiences and

4

<sup>&</sup>lt;sup>1</sup> The Council of Europe AI Convention is set to become a legally binding instrument on the development, design and application of AI systems based on the Council of Europe's standards on human rights, democracy and the rule of law.

members have timely access to information on timelines, documents, and proceedings of relevant political negotiations, such as the AI Act. Access Now and EDRi have been consistently updating their websites with relevant information, while Health Action International has been writing blogs for the wider health sector explaining the relevance of the legislation. However, some organisations also reflected on gaps around communications and the need to grow capacity in this area.

For organisations new to the field (ESWA, Friends of the Earth Europe, Health Action International) the grant has them to start this stream of work. ESWA reflected that it has established itself as a well-connected and recognised organisation on questions of sex work and digital rights, even though they had no prior experience in the area. Health Action International (HAI) has increased their overall capacity on advocating for legislative files linked to digital policy and health, and now has the skills to analyse implications for the health sector, such as "signalling risks of AI & ADM technologies to patients and patient's rights, critically appraising and countering MedTech argumentation".

Organisations with prior expertise on technology (Access Now, EDRi, Foxglove, Panoptykon) report that funding has supported their advocacy capacity to extensively work on the AI Act and collectively achieve tremendous impact on the regulation (see the section on policy impact). A lot of this new capacity has been invested in coordinating a strong and inclusive civil society position on the AI Act, some of which is attested by joint statements, such as this statement calling for a rights-based AI Act, coalitions and campaigns. Both EDRi and Access Now highlighted that coordination capacity has been important for their work.

The grant has supported organisations to follow technology and policy developments beyond the AI Act. For example, Access Now initiated a <u>letter</u> signed by 19 organisations, asking the EU-funded ITFlows Consortium to withdraw and stop developing predictive analytics tools to forecast migration movements and other technologies considered for strict regulation under the AI Act. Meanwhile EDRi coordinated advocacy on the EU's legislative changes in the context of security databases (EUROPOL, Prüm framework, EURODAC), focusing on respecting fundamental rights in the cross-border investigation of crimes.

**Foxglove** has been able to advance their algorithmic justice work and support the Greater Manchester Coalition of Disabled People to challenge the Department of Work and Pensions secretive algorithm that they believe to be flagging disabled people unfairly for benefit fraud.

## Increasing the diversity of the civil society ecosystem

The European AI & Society Fund believes it's important that a diverse spectrum of civil society has the knowledge and capacity to advocate for AI that supports a fair, inclusive and sustainable future. We have funded grantees with expertise in specific thematic fields and that represent communities or interests and want to address how AI is affecting their work.

#### Representing affected communities

The grant has enabled several organisations that work to advance the rights and interests of communities that are disproportionately affected by negative impacts of AI (PICUM, ENAR, ESWA) to include AI and digital policy among their organisational priorities. For example, PICUM has built a broader framing and understanding of how tech is applied in migration contexts, often in harmful ways. PICUM's increased understanding and engagement on AI has resulted in contributing evidence and analysis to EU and national partners of how AI and technology intersects with migration. PICUM has been able to engage on topics as diverse as data encryption, regulation on countering child sexual abuse material (CSAM), the digitalisation of applications for residence status, labour inspections and workers' rights, the online dimensions of anti-trafficking, Covid-19 vaccine certificates, and the broader intersections along digital technology, policing and migration.

Black-feminist led organisation **Glitch** reflected that through working on AI they have learnt that "there is a significant need for **Glitch's** work and perspective in policy and advocacy work on AI as there is a clear lack of Black digital feminist and intersectional perspectives in this space - particularly understanding how online gender-based violence is a prominent form of AI harm, yet there is sparse research and advocacy work from this perspective". The grant enabled **Glitch's** work to bring this perspective to the policy-making process through conducting research "Artificial Intelligence & Online and Technology-facilitated Gender-Based Violence: An EU Landscape Analysis", as well as collaborating with **ENAR** to build knowledge and capacity on non-carceral forms of redress where AI use has caused harm, for example, deepfakes depicting racialised women.

The recruitment of an advocacy and AI officer has enabled **ENAR** to build its capacity to engage in advocacy activities around the AI Act and issues related to national contexts in EU Member States from an anti-racist perspective. **ENAR** also pointed that the digital ecosystem needs the integration of anti-racist movements, and it is reflected in **ENAR**'s approach: organisation has widely engaged in using their newly acquired capacity to build these links through their own network and beyond.

New internal capacity for **ESWA** has resulted in knowledge sharing through in-person and online meetups. It has allowed **ESWA** and member organisations to promote a rights-based and feminist approach to innovation and policymaking and include voices of sex workers in various new policy and community spaces, such as the Platform Work Directive.

#### Thematic clusters

European AI & Society Fund grants have also supported organisations to initiate activities focused on AI among groups that share a specific area of expertise, such as farming or gender-based violence.

An online event on "Technology Sovereignty – What kind of innovation and technology do small-scale food producers need and want?" organised by the **Friends of the Earth Europe**, engaged more than 150 participants and created appetite to further explore issues related to digital technologies and AI and automated decision making in the wider food

movement, shepherd networks, small scale farmers and agricultural thinktanks. Their activities contributed to the creation of an informal group of organizations working on data, digital technologies and AI in the context of farming in Europe. It has been a strategically important support, since it has been challenging for the Friends of the Earth Europe to establish collaborative work within the cohort, as thematically their focus is very different from that of other organisations.

ENAR organised two national roundtables in Greece and Croatia with an intention to strengthen their own ability and the ability of their network and other civil society organisations to engage in anti-racist advocacy on AI on a national level. The outcomes of both roundtables revealed different political contexts and opportunities for action. The main takeaway of the roundtable in Croatia highlighted Croatia as one of the main EU external boarder countries that plays an important role in the interoperability process between different databases. The main outcome from the roundtable in Greece was the identification of the need to increase communication between civil society groups working on migration and digital rights organisations to ask for more transparency and accountability from authorities on the use of AI systems at the Greek border.

ENAR also shared reflections from the successes and challenges when engaging new organisations:



We learned the language is one of the key tools that can make the communities we represent approach or move away from the topic. In our first two roundtables we tried to build the connection between the topics our members are familiar with the use of AI in their domains of expertise.

#### **ENAR**

Glitch held a webinar with a small group of interested organisations in digital rights and policy space and feminist organisations to share the findings from their research on feminist approaches in AI "Artificial Intelligence & Online and Technology-facilitated Gender-Based Violence: An EU Landscape Analysis". Through sharing their knowledge with partners, they effectively started to address the knowledge gap that they've identified.

This approach demonstrates that capacity building events can be a successful catalyst that allows wider field, groups of people and organisations to get interested in the topic and explore their own engagement to strategically support the missions of our grantee partners or pursue action independently.

## Network organisations – growing members' capacity and understanding

Many of our grantees are umbrella organisations with networks of Europe-wide members and have used the grant to strategically build capacity of members and allied civil society organisations to engage in the debate on AI, both internally within the organisation and externally with policymakers. **PICUM**, **ESWA**, **EPF**, **ANEC** and **ENAR** specifically highlighted that capacity building of their member organisations and allies has helped to establish links between European and national level advocacy and policymaking and have larger impact on legislation and policies.

**ENAR** conducted two consultations with their members on anti-racism, AI and digital rights, that have resulted in more awareness of the strategic issues and priorities, as well as more active engagement on AI and digital rights in their network<sup>2</sup>.

ANEC has been successfully building capacity of other consumer and civil society organisations to take part in AI standardisation processes through trainings and upskilling activities. It has enabled them to play a more active role in AI debates and standardisation processes at both national and European level, notably, the AI standards linked to the AI Act, that will set concrete requirements for those developing AI and making these systems available for use.

**ESWA** was also able to provide help in fundraising to their members to work on digital rights and sex work in their national contexts.

European Patients' Forum (EPF) organised a training for 20 representatives of EPF members and EPF staff members, that allowed to build an understanding of the potential benefits of AI in advancing healthcare and the potential risks of biases from the data in algorithms. They also built an understanding of the role of patient groups in influencing how AI is designed, empowering them to improve the lives of their members. The renewal of the grant specifically allowed EPF to continue their engagement on the AI Act and scope their work on the AI Liability Directive.

With respect to workers' rights, **PICUM** engaged with its members to better understand the impact of the use of technology and digital tools in monitoring of workers and their data management by labour authorities. They held a dedicated discussion with members about acceptable and unacceptable uses of technology in the workplace, currently being discussed within the European Platform tackling undeclared work and the European Labour authority. **PICUM** produced an internal reflection paper for members, touching upon crossgovernment cooperation in data collection, sharing and analysis, the potential use of drones and other digital tools for labour inspections, as well as social media analysis and data scraping for tackling and preventing undeclared work.

-

<sup>&</sup>lt;sup>2</sup> ENAR's member FEMYSO, Forum of European Muslim Youth Organisations, successfully applied to our Ecosystem Grants Programme and will soon start implementing their project.

#### **Collaborations**

As part of our ecosystem approach, the European AI & Society Fund aims to support collaboration among our grantees, without being directive. We have found that our grantees have been keen to work together, combining their respective expertise on technology and social justice issues to achieve more collectively than they can alone. Most of the organisations reported that the in-person community convening organised by EAISF and Civitates in November 2022 was very useful for building connections with other community members, particularly around health and intersectional issues.

The <u>#ProtectNotSurveil</u> campaign, coordinated by EDRi, PICUM, Access Now and the Refugee Law Lab, enjoyed an active engagement from organisations across our ecosystem. The campaign mobilised 200 organisations & academics to call for the AI Act to protect the rights of migrants and people on the move and pushed for additional safeguards in the AI Act for when the technology is used in migration context.

Access Now's #BanBS campaign and EDRi's Reclaim Your Face campaign played a role in bringing forward discussions on facial recognition in the AI Act negotiations, and this role has been recognised in public events by co-rapporteur MEP Brando Benifei. It resulted in the Members of the European Parliament voting to ban biometric identification, including facial recognition in their position on the AI Act.

Glitch and ENAR established a collaboration to engage anti-racist organisations and deepfake experts on the issue of AI deepfake image abuse targeting Black and racialised women. In two online webinars they explored AI harm and user redress for racialised communities and identified research gaps.

Following the joint grantee convening of the Fund and Civitates, grantee organisations have been creating new collaborations on health and AI (ENAR, ESWA, HAI, EDRi, Moje Państwo, EPF) to collectively make sense of and influence this field. The Ecosystem approach has been especially fruitful, given that grantee organisations with a topical expertise on health have been able to connect with organisations from digital rights and social justice spaces. Grantees established close collaboration on the European Health Data space, a new EU legislative initiative, calling for patients' control over their data.



Through the initial meetings with other grantees we came to learn how important the AI Act was and as a result have developed an advocacy programme around it. Further, the discussions on fundamental rights risks of AI technologies helped us to conceptualise such risks for AI used in healthcare. We discovered that there weren't many health NGOs working on this matter which gave a sense of urgency to our advocacy efforts and made us feel like we could make an actual contribution.

- Health Action International

### Spotlight: Countering ableist narratives spread by the industry: Access Now X EUCAP

After technology companies claimed that emotion recognition technology is useful for autistic people, Access Now in collaboration with EDRi, proactively reached out to the European Disability Forum and the European Council for Autistic People (EUCAP) to learn that they, along with scholars, are sceptical of the need and the feasibility of such technology. As a result of this collaboration, organisations collectively were able to counter ableist stereotypes promoted by the industry. Inputs from EUCAP were taken on board in the AI Act position of the civil society coalition.

Access Now has continued this work in a report on biometric profiling 'Bodily harms: how AI and biometrics curtail human rights', which integrates interviews with EUCAP and other disability justice advocates.

This is a strong example of collaboration between civil society organisations in challenging biased narratives from the private sector, as well as the value in working with partners, especially those outside the digital rights space.

#### Policy and advocacy impact

Grantees have been able to translate the increased capacity into tangible policy and advocacy outcomes. The summary of these achievements demonstrates how a relatively small amount of funding can create substantive change and is indicative of the potential that sustained and increased resourcing of the field could have. We focus on one of the key legislative files – the European AI Act, but also highlight other examples, such as the AI Liability Directive, Digital Services Act and legislation and grantee's litigation activities to protect workers' rights. The list is however not exhaustive and as indicated above, our grantees have been able to engage on a large number of policy areas and across different policymaking arenas.

#### AI Act

Most of the grantee partners have worked individually and collectively to advocate for strong safeguards and checks in the AI Act, such as fundamental rights impact assessments, increased transparency, harmful technology prohibitions and user empowerment. At the time of the reporting, the vote on the European Parliament's position on the AI Act had not taken place yet. However, at the time when this report is compiled, the success of this work and its influence on the European Parliament's position is already known, and the process has moved to the next phase of negotiations.

When describing their work and impact on the AI Act, all organisations that had engaged in the AI Act advocacy, mentioned how instrumental coordination and collective advocacy has been to their collective success. This coalition has been co-coordinated by Access Now and EDRi, and involve many grantee partners of this cohort, including Panoptykon, AlgorithmWatch, PICUM and ANEC.

It is well illustrated by **EDRi's** words on the impact of the coalition of Civil Society Organisations collectively working on the AI Act:



without this coalition there wouldn't be any of the achievements.

## The European Parliament voted to adopt many of the positions advocated by the grantee partners, some of which include:

- Ban real-time remote biometric identification in public spaces and most uses of post
  or retroactive remote biometric identification campaigns by Access Now and
  EDRi heavily supported to get this ban across the line.
- Ban use of emotion recognition in law enforcement, border management, workplaces, and education.
- Prohibition on predictive policing that will have a big impact on stopping racial discrimination of AI systems.
- Strict rules for high-risk AI systems and mandatory human-rights impact assessments for deployers of high-risk AI systems.
- Increased transparency, including databases on the use of high-risk AI by public authorities.
- Inclusion of general purpose AI systems (or Foundation models) in the AI Act and obligations for these AI systems (advocated by ICCL).
- Strengthened protections for people on the move inclusion of additional high-risk systems, such as AI border surveillance technologies and forecasting tools in migration context, that will have to adhere to stricter rules and human-rights impact assessments. It's a particular achievement of the close collaboration by PICUM, EDRi, Access Now, ENAR and the entire #ProtectnotSurveil coalition.
- Mandated civil society and stakeholder engagement in AI standard setting processes ANEC has been a key stakeholder and advocate to make sure that standardisation process that is industry dominated, is inclusive to civil society.
- Strengthened the powers of future AI regulators by including remote investigation powers (advocated by ICCL).
- Right to lodge a complaint about an AI system, that was one of the key advocacy targets for **Panoptykon** and other organisations.
- Addressed shortcomings of data governance regime by including requirements for two types of machine learning techniques (advocated by ICCL).
- A revised definition of AI systems that addresses the shortcomings of the Commission's definition, which would have left certain harmful AI systems out of the AI Act (advocated by ICCL).

Grantees have had a tangible impact beyond the European Parliament. The European Commission has <u>addressed</u> technical errors that **ICCL** had pointed out when they requested European standardisation bodies to draft standards. **ICCL** has been the only organisation that has identified and advocated to address these technical issues. Had they remained unaddressed, the technical standards could have resulted in allowing wrong performance metrics that could be dangerous.

Organisations have worked hard to resist industry lobbying to water down the regulation. The risk classification process in particular has been undermined by the industry lobbyists, where they've tried to convince decision makers that companies can self-regulate on determining whether their systems are high risk or not, trying to escape additional obligations.

Another challenge mentioned by many organisations is the law enforcement and state security lobbying to be exempt from limits to use of harmful technology. This has been especially challenging for organisations (PICUM, EDRi, Access Now, ENAR) advocating for protections against use of discriminatory AI in migration contexts. While they've managed to secure extra protections, an outright ban on the use of these technologies against people on the move was not achieved.

AlgorithmWatch has been successfully advocating for ecological sustainability aspects of AI systems to be addressed in the AI Act, an element that is not at the forefront of demands of many civil society organisations.

#### AI Liability Directive and Product Liability

Several organisations have engaged in advocacy on the ongoing AI Liability Directive and Product Liability Directive. ICCL reported that the European Commission has accepted key ICCL recommendations on AI and product liability. This will play a key role when people are negatively affected by AI systems.

#### **Digital Services Act**

While many of our grantee partners have worked on the Digital Services Act (DSA) as part of other grants, one of **Mnemonic's** main focuses within this grant has been on content moderation and automation rules set in the DSA.

Through working in a coalition with other organisations **Mnemonic** successfully advocated for:

- transparency reporting of social media platforms, including detailed information on the use, accuracy and purpose of automation for content moderation.
- Requirement for platforms to notify users when content has been "demoted" or subject to other measures taken by platforms.
- special requirements for very large online platforms to do extra due diligence about the impacts of their moderation policies and operations.
- enhanced transparency in content moderation and requirement to allocate adequate resources for its effective implementation.

#### Health

Grantee partners working on health actively advocated for medical devices to be in the scope of the AI Act, lobbied against by the MedTech sector. **Health Action International (HAI)** noted that the sector faces heavy MedTech lobbying, who claim that the AI Act could delay access to new lifesaving technologies, and that there is no need for a new AI Liability regime. In response, **HAI** organised a webinar to debunk some of the MedTech arguments and are writing <u>direct responses to</u> the articles they publish to refute false claims.

#### Workers' rights

Foxglove has launched two legal cases supporting content moderators outsourced by Meta in Kenya, one of the largest global hubs for content moderators. One of these cases brought to court by a collective action of more than 180 content moderators, secured a ruling from a Kenyan judge that that foreign registered entities like Facebook cannot dodge accountability in the Kenyan courts. The judge also ruled to protect jobs of more than 200 content moderators that Facebook sacked due to them organising and demanding better working conditions and that despite its harmful outsourcing model, Facebook is the true employer of the content moderators.

The petitioners of another case against Meta, supported by **Foxglove**, demand historic safety changes to Facebook – including adjustments to Facebook's algorithm, hire enough safety staff, and create a restitution fund for victims of viral hate in the Ethiopian war. If successful, this case could have global implications and will force Facebook to change its harmful business model.

#### Organising of content moderators in numbers:

World's first social media content moderator's summit organised by Foxglove, German union Ver.di and German non-profit Superrr Lab brought together over 50 content moderators from TikTok, Facebook, Majorel and CCC.

One manifesto with content moderators' demands to corporations.

80 content moderators across Germany have joined a union.

Two work councils have been formed of social media content moderators in Germany giving workers increased protections and rights.

Reflecting on challenges in helping content moderators to unionise and defend their rights, **Foxglove** shared that the fear that big tech companies create slows organising and makes workers hesitant to speak out. However, this culture is slowly changing, and workers are

becoming bolder by the day, but it takes time. The summit that **Foxglove** and partners organised gave space to workers from multiple social media companies to share experiences about content moderation, attend trainings on unionisation and works councils, plan campaigns, speak to press, and distil their demands about what needs to change to make their work safe and fair.

In the context of migration, **PICUM** worked to preserve the autonomy of the undocumented workers in labour related data collection practices by authorities, engaging with European institutions responsible of setting the rules. **PICUM's** recommendations protecting undocumented workers have been reflected in the new reporting system under the EU Employers' Sanctions Directive.

**ESWA** successfully challenged and prevented adoption of discriminatory proposals into the Digital Services Act that would otherwise cause harm to sex workers by forcing them to disclose their sensitive information.

#### Media

Although our grantees were not specifically asked to report on their media engagement, we have highlighted a selection of media coverage. As our funding has prioritised policy and advocacy work, organisations have placed less emphasis on communications, and this is an area that remains under-resourced and a challenge for many in our community. Nonetheless there have been some striking successes.

In September **EDRi**'s Senior Policy Analyst <u>Sarah Chander</u> was named one of the 100 most influential people on AI in the Time100 AI list. It's a tremendous recognition of Sarah's work in AI policy, and of the work of EDRi.

Foxglove's legal cases made front page news around the world – raising awareness of the harms the social media giants cause globally (<u>Washington Post</u>, <u>Daily Mail</u>, <u>Africa News</u>, <u>Reuters</u>, <u>BBC</u>, <u>TIME</u>, <u>The Guardian</u>, <u>BBC Focus on Africa</u>, <u>TIME</u>, <u>Reuters</u>, <u>Africa News</u>, Financial Times).

In addition to helping journalists in their AI reporting, **ICCL** has been explaining technological developments and warning on the dangers of facial recognition technology in many media articles. These include articles in Brussels media such as Euractiv and Politico, but also in international media such as Euronews and Washington Post, among others.

National level coverage has been important for other organisations. **Panoptykon** has successfully and extensively worked with Polish media, securing coverage on AI in different outlets, including Dziennik Gazeta Prawna, and a prime-time interview on TVN 24. **Glitch** has also increased the visibility of the issue of AI harm (specifically deepfake image abuse), with hooks to popular culture and public discussions for example, through an interview with BBC on the rising issue of deepfake abuse.

**Mnemonic's** expertise in documenting human rights abuses was covered in articles by Intercept and <u>BBC</u>. Mnemonic also contributed to the production of a <u>BBC documentary</u> about social media takedowns.

**PICUM** increased media and public attention to technology abuses in migration, contributing to an <u>op-ed in Al-Jazeera</u>, and co-authoring with **EDRi** a piece in <u>Euronews</u>, calling for action to address discriminatory surveillance in migration.

#### Challenges

One of the challenges highlighted by grantee partners is finding ways to sustain their efforts in the long run to have a profound impact. **Access Now** noted that the impact of consistent work and building of expertise in the field for years has resulted in **Access Now** being recognised as an expert organisation and actively consulted on legislation by the key decisionmakers, allowing to achieve an impact.

For other organisations who are just starting out in this field and have gained an initial understanding, such as **Friends of the Earth Europe**, focusing on AI and data-based technologies in peasant farming, sustaining the work would be important to understand implications over a longer period of time. Future uncertainties open questions about the future use and development of the newly acquired capacities and established networks.

Legislative processes (including the one on the European AI Act) "are long, unpredictable and tedious, and need constant attention both on European and national levels". Engaging on legislative files also requires adaptation and reactivity. **Panoptykon** noted that due to the complexity and tight timeline, their policy experts had to invest more time than initially planned, while a few organisations raised that unplanned reactive work to counter industry lobbying interfered with the planned activities and required more resources.

Organisations also shared that engaging with the Council has been challenging, due to its opaque decision-making processes and closedness to civil society organisations. Despite, multiple organisations have managed to successfully advocate on several issues linked to the AI Act and other legislative files.

Most organisations noted that working in coalitions with other civil society organisations is an effective way to coordinate and achieve an impact in a complex policy landscape. However, they shared that building meaningful and reciprocal coalitions across movements and organisations require time, resources and commitments.



To build an ecosystem of resilient organisations, there should be efforts to sustain organisations in the long-term and support national level work, and specifically organisations working on the most harmful uses of AI.

- Grantee partner

Concerning challenges, **EDRi** noted that more resources are required to build strategic capacity to mobilise a wide range of actors in civil society and research community. The power and resources of those with opposing agendas is unmatched, and organisations require more time with other civil society actors to coordinate and plan advocacy.

Finally, Access Now reflected that the hype around AI and misconceptions of AI, often uncritically reported by media, have contributed to further challenges for civil society to meaningfully engage with wider public and stakeholders.

#### Learnings for the European AI & Society Fund

This section summarises grantees' reflections concerning Fund's own procedures and activities, as we continue to work to make sure our funding is effectively meeting their needs. This section has been completely anonymised.

#### Reducing administrative burden and practicing lightweight procedures

All organisations found the application process relatively easy, lightweight, and straightforward. One organisation noted that granting only 50% of the requested financing significantly downscaled their planned activities.

Cost extensions, where requested by grantee partners, and procedures around renewals were regarded positively, and allowed organisations to adapt to their circumstances. Also, the possibility to modify the plans to align with either new organisational priorities, resources or the political agenda was viewed positively, and this kind of flexibility was important for several organisations.

Reporting requirements were viewed as proportionate and meaningful, avoiding repetitive reporting of already known activities. Some organisations noted that it has been helpful to have a clear timeline with reporting deadlines, that has been especially important for smaller organisations. One organisation reported that the low overhead for the grantees, whether it be the application process or the reporting, has been critical for them to spend more time on impactful work.

One organisation noted that more clarity around financial reporting would be helpful.

#### Financial sustainability

A number of organisations have drawn attention to the growing issue of financial instability in the wider digital rights field and their own organisations. Especially in the light of new organisations becoming active on AI and digital rights, organisations expressed a worry about the long-term survival and sustainability of already established organisations. Some organisations listed it as a high priority to address.

Grantee partners expressed interest in being connected with other foundations and were happy about the introductions that already have been made.

#### Activities organised by the Fund

Activities aimed at better understanding the AI policy landscape were useful for grantee partners and provided a possibility to place their organisations in this landscape and map the interests of fellow grantee organisations within the cohort. Many organisations noted that joint events and workshops were a place where collaborations were started, and one organisation particularly noted that Fund's events have been a space to meet organisations and individuals who are not the 'usual suspects' for collaboration.

Policy skills workshops were particularly useful to organisations that are new to EU processes to contribute to their knowledge about how the EU legislative change works and how to better influence it. While one organisation shared that their limited capacity prevented joining some of the activities organised by the Fund.

The (Joint) Learning Initiative grant, allowed grantee partners to organise additional activities, such as webinars and policy and advocacy coordination meetings, many of which also contributed to the needs of the wider ecosystem, not only individual organisations. This grant heavily supported organisations to coordinate their policy and advocacy on the AI Act. Some organisations used it for internal development and capacity building to address specific needs.

Several organisations expressed an interest for the Fund to organise future opportunities to learn more about the technological side of the AI, as well as other areas of law, such as discrimination law and further the collaborations on the intersection of technology and migration.

## European AI & Society Fund Monitoring and Evaluation Criteria<sup>3</sup>

Objective I: A greater number and more diverse range of CSOs have the capacity and skills to effectively engage and secure tangible impact on policy around AI

<u>Indicator I: A greater number and more diverse range of CSOs better understand AI and its impact on the communities and issues they represent. They bring evidence from affected communities to the political debate (e.g.: position papers, consultations, letters to MEPs).</u>

<sup>&</sup>lt;sup>3</sup> Objective II concerns philanthropic sector, therefore, it has been excluded from this analysis that focuses on grantee reporting.

- The cohort has a diverse set of organisations, that reflects in the multiple areas of focus, from algorithmic accountability, to farming, to health.
- They represent diverse groups, including undocumented migrants, sex workers and racialized communities, and it informs their policy demands expressed through statements, letters, and amendments.
- Each organisation has taken an individual approach to effectively work with their communities, including building capacity, conducting consultations, and convening meetings.
- The grant has supported organisations to engage on AI policy, where in most cases, without this capacity, this work would not be happening. It would negatively reflect on voices being left out from political processes, and possibly important safeguards not included in the legislation.

#### Indicator II: CSOs have the skills they need to do policy and advocacy work around AI.

- Organisations reported to have added significant expertise and capacity through hiring for organisational roles, including AI analysts, policy and AI coordinators, Senior Technology Fellow and others. This has allowed them to acquire specialised expertise to engage with policy.
- Some organisations had used contractors to conduct research, deliver campaigns and provide other outputs supporting their work.
- Many organisations found Fund's skills-building activities useful, especially concerning EU policy and AI landscape.

### <u>Indicator III: CSOs understand where they sit in the ecosystem, initiate collaborations and create coalitions to advocate for shared goals.</u>

- Grantee partners have been very active in forming coalitions and collaborations, and activities by the Fund have broadly facilitated connections between grantees.
- Organisations noted that the success of securing many political demands in the European Parliament's AI Act position has been a collective achievement and most of this success would not be possible without the joint coordination and effort.
- Organisations rely on each other for topical expertise, especially in areas where some organisations hold specific focus, such as disability rights, migration and health.
- Grantee partners highlight the need for adequate resources for undertaking coordination, as it's directly linked with the scale of impact of their work.

<u>Indicator IV: CSOs create meaningful connections with policymakers to better advocate for their position and have their say on the policy agenda. Their expertise is recognised and their recommendations are adopted.</u>

- All organisations reported that they are recognised in their fields as experts and that the grant has helped to build deep expertise on the AI.
- All organisations have established new and strengthened existing connections with policymakers, and they are consulted for their inputs.
- Established organisations reported that the consistency of their work has been the key to be regarded as experts over the period of time, and has helped in achieving impact.

• Organisations had formed coalitions with Members of the European Parliament, organised hearings, as well as organised petition-handover.

Objective III: The European AI & Society Fund is a valuable participant in shaping a landscape where civil society work on AI can thrive

Indicator I: Funders and Policymakers understand the implications of AI on society better. The Fund is sought out for input and advice from both CSO and funders. Our content helps organisations navigate issues around AI

- All grantee partners shared that the joint convening of EAISF and Civitates was very useful for building connections between organisations, funders, as well as advancing discussions on topical issues.
- Other activities organised by the Fund were particularly relevant for grantee organisations new to the EU policy making in navigating EU policy landscape.
- Attending many activities was also seen as burdensome for smaller organisations.

<u>Indicator II: The fund is working towards lightweight administrative requirements for grantees</u>

- Application process was viewed as easy and straight-forward.
- Reporting obligations were regarded as proportionate and meaningful, not putting too much burden on the organisations, with a recommendation to make financial reporting clearer
- Organisations found that the flexibility and possibility to make adjustments were important to respond to their context and take into account any internal or external developments.