DANES JE NOV DAN

Safe and Trustworthy Artificial Intelligence in the Public Sector | Recommendations for the establishment of an AI registry

Introduction

In the light of the extraordinary progress of artificial intelligence (AI) technologies in recent years, we have noticed an increasing interest in this technology even among employees in the Slovenian public sector. Although there is numerous evidence that AI systems can produce erroneous, inaccurate or even deplorable results and can lead to decisions that are discriminatory and dangerous[1], their use in the Slovenian public sector is not attracting much attention from the public or decision-makers. In fact, researchers, journalists, and civil society – and we assume decision-makers as well – practically do not have the means to gain a comprehensive insight into which systems are in use, how they work and on which occasions or in which procedures they are being used.

Due to the lack of transparency in the use of AI tools in the public sector, we at Danes je nov dan have already established a **Public Sector AI Registry**. The registry currently lists nine systems,[2] though it is estimated that several dozen more are in use. Based on the projects that are already underway, public contracts and conversations with various employees in the public sector, we expect that the use of AI in the public sector will soar in the coming years, increasing the impact that algorithms have on our lives and the risks of human rights violations.

Public debate on the automation of public services, control over the legal and responsible use of AI, and public trust are only possible if we know which systems are in use and if the public has access to all relevant information. Unfortunately, this is currently not the case in Slovenia. The information available to us is the result of the efforts of individual CSOs and journalists, which have neither sufficient personnel nor political power to obtain

[1] For example: Dutch Algorithm for Detecting Abuses of Social Transfers, URL: https://algorithmwatch.org/en/syri-netherlands-algorithm; Danish Algorithm for Detecting Abuses of Social Transfers, URL: https://www.amnesty.org/en/documents/eur18/8709/2024/en/.
[2] The document was prepared in September 2025.

all the essential data. **That is why we call on the Ministry of Digital Transformation of the Republic of Slovenia and the Government of the Republic of Slovenia to establish a publicly accessible registry that will include all key information on artificial intelligence systems in use in the public sector.**

Basis for establishing an AI registry

The idea of an AI registry for the public sector is based on the right to access information of a public nature, which is enshrined in Article 39 of the Constitution of the Republic of Slovenia and defined in the Act on Access to Public Information (ZDIJZ). Article 10 of ZDIJZ allows persons liable under the act to proactively publish information of a public nature on an online national portal established for this purpose.

One of the strategic goals of the National Program for the Promotion of the Development and Use of Artificial Intelligence in the Republic of Slovenia until 2025 (NpUI) is to increase public trust in AI, with emphasis on comprehensibility and transparency of algorithms. Of course the AI registry itself cannot guarantee the impartiality, traceability, availability and comprehensibility of algorithms, but it can be part of a normative framework that ensures that the use of AI is responsible and that the public has access to information about algorithms that affect their lives.

Some countries or regions in Europe have already established similar registries.[3]

Why the AI Act database is not enough

Article 71 of the EU Artificial Intelligence Act (AI Act) provides for the establishment of an EU database for high-risk AI systems. Although such a database is welcome, it is not sufficient and cannot replace a publicly available registry of **all** AI systems used in the public sector.

What are the limitations of the EU database?

1. Only high-risk AI systems will be entered into the database. This means that most of the AI systems in use will not be part of the collection and consequently available to the public (for example, Tipko system for automated speech recognition and conversion into text, which is used by several Slovenian courts, or

[3] For example: The Algorithm Register, Kingdom of the Netherlands, URL: https://algoritmes.overheid.nl/en; Algorithmic Transparency Recording Standard Hub, United Kingdom, URL: https://www.gov.uk/algorithmic-transparency-records.

chatbots for communicating with citizens). In addition, the AI Act allows providers to determine themselves whether their system is high-risk. Such a system still needs to be registered in the EU database, but less information is required.

2. High-risk systems in the field of prevention, detection, investigation and prosecution of criminal offences, migration, asylum and border control are published in the non-public part of the database. Such exceptions severely limit the potential for effective public oversight of the responsible use of AI.
3. High-risk systems in the field of critical infrastructure are registered in the national database. According to the currently available national proposal of the Act on the Implementation of the Regulation (EU) on the Determination of Harmonised Rules on Artificial Intelligence[4] the data in Slovenian records of high-risk AI systems in the field of critical infrastructure will only be partially public. Information about the provider, provider's legal representative and the name of the system will be publicly available, but the intended use or any information about the operation of the system will not be publicly available.
4. Registration in both databases will only be mandatory for high-risk systems that will be placed on the market or put into use after August 2026. For all systems that will be in use before August 2026, registration is needed only if their design or intended purpose changes significantly after that date. The fact that not all systems currently in use will be covered by either database significantly limits the usefulness of both databases and reduces the potential for ensuring public control.

At the time of writing this document, the EU database and the Slovenian database for critical infrastructure had not yet been established, so we cannot provide a more detailed comment on the databases themselves. Nevertheless, it is already clear that the two will not contain some key information about AI systems, such as information on which data the models were trained on.

[4] Proposal for the Act on the Implementation of the Regulation (EU) on Establishing Harmonised Rules on Artificial Intelligence, first reading:
https://www.dz-rs.si/wps/portal/Home/zakonodaja/izbran/!ut/p/z1/04_Sj9CPykssy0xPLMnMz0vMAfljo8zivSy9Hb283Q0N3E3dLQwCQ7z9g7w8nAwsnMz1w9EUGAWZGgS6GDn5BhsYGwQHG-pHEaPfAAdwNCBOPx4FUfiNL8gNDQ11VFQEAAXcoa4!/dz/d5/L2dBISEvZ0FBIS9nQSEh/?uid=CC34B9C41C071F31C1258CEE00477E2C&db=pre_zak&mandat=IX&tip=doc
(accessed on 31/08/2025).

Recommendations for decision makers[5]

The increasing presence of AI in the public sector must be followed by measures that ensure the responsible development and safe use of automated decision-making. As one of the steps to achieve this goal, we propose **establishing a national public sector AI registry**. Transparency is a prerequisite for public scrutiny and democratic debate and can lead to a more deliberate and responsible introduction of new technologies.

The proposed registry should be established in the form of a publicly accessible database of AI systems in use in the public sector. The legislator should create a legislative framework for the operation of the registry, ensure sufficient funding for its establishment and appoint persons responsible for maintaining the registry and regularly and authentically entering information about AI systems. Relevant stakeholders should be included in the development of the database and control over the functioning of the registry, especially organisations with expertise in the field of ethical use of AI and/or organisations that represent vulnerable groups that could be most negatively affected by the irresponsible use of AI.

When designing the registry, the legislator should pursue the following goals:

1. The public should have access to comprehensive information about AI systems.
The registry should therefore include:

- **AI system purchase information** (who made the purchase, source of financing, legal basis, public procurement process, etc.),
- **information about the use of the AI system** (intended use, goals and effects, explanation of the algorithm's role in decision-making),
- **technical information about the AI system** (who developed the AI model, data on which the model was trained, weights, source code where possible),
- **description of compliance with legislation** (analysis of the impact on human rights, analysis of the impact on personal data, description of the process for monitoring the operation and use of the system),
- **data related to legal protections** (description of complaint mechanisms, contact of responsible person).

2. The public should be informed about all AI systems in use in the public sector.
The registry should include **every** AI system in use – both those included in the EU database and systems not defined as high-risk. The public database should also include systems in the field of prevention, detection, investigation and prosecution of criminal

[5] When preparing the recommendations, we started from the document of the Spanish network IA Ciudadana Making Algorithm Registers Work for Meaningful Transparency, URL: https://iaciudadana.org/wp-content/uploads/2025/03/Report-1.pdf.

offences, migration, asylum and border control management. When there are valid reasons, certain data can be kept private. However, there is no reason not to publish at least the information that is accessible under the Act on Access to Public Information. The registry should also include systems that are still in the development or purchase process, as well as systems that are no longer in use.

3. The registry should be user-friendly and accessible.
The registry should be designed in such a way that it is understandable, user-friendly and accessible to all persons. In addition, it should allow searching and filtering, and every change (new entry or change of entry) should also be recorded.
The registry should be open source, and the collection should be machine-readable and accessible via an API call.

Danes je nov dan, Inštitut za druga vprašanja (Today is a New Day, Institute for Other Studies) is an independent non-profit organisation founded in 2013 that works at the intersection of technology, democracy and digital rights. By combining the development of open source tools, advocacy and cooperation with communities, we strive for greater transparency of institutions and active involvement of the public in political processes. The institute has the status of an organisation in the public interest in the field of information society. We regularly work on the regulation linked to the responsible use of new technologies, with a special emphasis on artificial intelligence. We contribute to the co-design of national policies, participate in the expert council to discuss issues and provide advice on the implementation of the AI Act and in the process of preparing the National Program on AI 2030. We work in a wider European context as members of the digital rights network EDRi, and we demonstrate our commitment to transparency with projects such as the Public Sector AI Registry.

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