

ALGORITHMIC TRANSPARENCY IN DIGITAL PUBLIC SERVICES: AN ADMINISTRATIVE LAW PERSPECTIVE

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Abstract

The increasing use of artificial intelligence and automated decision-making systems in digital public services has created new challenges for administrative law, particularly regarding transparency, accountability, and citizens' procedural rights. This study examines algorithmic transparency as a legal obligation of government institutions in AI-based public service delivery. Using a normative juridical method with statutory, conceptual, and comparative approaches, this article analyses how the right to explanation can be constructed as part of administrative due process, reason-giving, and good administration. The findings show that the use of algorithmic systems does not reduce the government's responsibility to provide lawful, reasonable, and reviewable decisions. Instead, the complexity of AI-based decision-making strengthens the need for meaningful explanations that are understandable, case-relevant, and useful for citizens affected by public decisions. This study argues that the right to explanation should not be limited to technical disclosure of algorithmic models, but should include information on whether AI was used, how it influenced the decision, what data and criteria were considered, and what remedies are available. The novelty of this article lies in positioning algorithmic transparency within the doctrinal framework of administrative law, rather than treating it solely as an ethical or technological issue. The study contributes to the development of accountable, citizen-centred, and legally grounded AI governance in digital public administration.

Keywords: administrative law; algorithmic transparency; artificial intelligence; digital public services; right to explanation.

1. INTRODUCTION

The rapid digitalisation of public administration has fundamentally transformed the way governments design, deliver, and evaluate public services. Digital public service systems are no longer limited to electronic filing, online licensing, or administrative databases; they increasingly rely on algorithmic tools, predictive analytics, automated classification, and artificial intelligence to support or even shape administrative decisions. This transformation promises efficiency, consistency, speed, and broader access to public services, particularly in sectors such as social assistance, taxation, licensing, immigration, health administration, and citizen complaint management. However, the growing reliance on automated and AI-assisted systems also creates new legal and institutional vulnerabilities. When public decisions are mediated by algorithmic systems, citizens may no longer be able to understand how administrative outcomes are produced, why they are treated differently from others, or how they can effectively challenge an unfavourable decision. In this context, algorithmic transparency is not merely a technical concern, but a core requirement of democratic administration, legality, accountability, and procedural fairness [1], [2], [4].

The problem becomes more serious when algorithmic systems are embedded in public authority. Unlike private-sector recommendation systems, digital public service systems operate within the framework of administrative law and directly affect citizens' rights, obligations, access to benefits, legal status, and opportunities to participate in public life. Administrative decisions must therefore remain explainable, contestable, and attributable to a lawful public authority. If a citizen is denied a permit, excluded from a welfare programme, selected for inspection, or classified as high risk by an automated system, the administration cannot simply rely on technical complexity as a justification for opacity. Public authorities are bound by principles of legality, reason-giving, due process, proportionality, non-discrimination, and good administration. The use of algorithms in public service delivery must consequently be accompanied by a duty to disclose meaningful information about the logic, criteria, data sources, institutional responsibility, and potential consequences of algorithmic processing [11], [12], [13].

The central challenge is that many AI-based or machine-learning systems function through complex statistical correlations that are difficult for ordinary citizens, public officials, and even system designers to fully interpret. This creates the well-known "black box" problem, in which administrative decisions may appear efficient but become normatively fragile because affected individuals cannot understand the basis of state action. Such opacity may weaken trust in public institutions, reduce citizens' capacity to defend their interests, and obscure responsibility when errors,

bias, or discrimination occur. Moreover, the problem of transparency cannot be solved merely by publishing source code or technical documentation, because legal accountability requires explanations that are meaningful for the affected person and relevant to the administrative decision at issue. Explanation in public administration must therefore be translated into a citizen-centred legal standard, not treated only as a matter of technical interpretability [4], [14], [18], [19], [20].

Recent scholarship has examined AI and algorithmic decision-making in the public sector from several perspectives. Aoki et al. show that the type of explanation provided by government affects citizens' perceptions of accuracy, fairness, and trustworthiness in algorithmic decisions [1]. Rizk and Lindgren conceptualise automated decision-making as changing the decision space between public officials and citizens, thereby requiring a citizen-centric framework for legitimate ADM [2]. Gesk and Leyer demonstrate that citizens' acceptance of AI in public services depends on context, perceived risk, and reasons for or against AI use [3]. De Bruijn, Warnier, and Janssen warn that explainable AI may produce new perils when explanations oversimplify, mislead, or create false confidence in algorithmic outputs [4]. Grimmelikhuijsen finds that algorithmic transparency can influence perceived trustworthiness in automated public decision-making [5]. In parallel, Ahn and Chen emphasise the role of government employees' perceptions and willingness to support AI adoption [6], while van Noordt and Misuraca map the use of AI across European public administrations and identify governance, ethical, and organisational challenges [7]. Selten and Klievink further argue that public-sector AI adoption requires organisational arrangements that navigate the tension between separation and integration of AI capabilities [8].

Other studies have expanded the debate by connecting AI adoption with institutional capacity, administrative legality, and normative justification. Van Noordt, Medaglia, and Tangi analyse European AI strategies and show that policy initiatives often focus on data infrastructure and collaboration, while internal capacity and funding receive less attention [9]. Meijer, Lorenz, and Wessels explain how algorithmisation reshapes bureaucratic routines and organisational practices [10]. Williams argues that administrative law must adapt to the technical and normative challenges of algorithmic decision-making by public authorities [11]. Covilla highlights that AI in discretionary administrative decisions must be limited by duty of care, reason-giving, and judicial review [12], while Rudolf and Kovač examine the intersection between automated decision-making, administrative procedure, and data protection principles [13]. At the normative level, Kim and Routledge defend a trust-based foundation for the right to explanation [14], Vredenburg conceptualises the right to explanation as a response to opaque algorithmic power [15], Taylor questions the feasibility and philosophical structure of such a right [16], and Munch, Bjerring, and Mainz refine the issue by showing that the significance of stakes affects when explanation becomes normatively required [17]. These studies are complemented by broader debates on black-box opacity, double standards between human and algorithmic decisions, agency-based explanations, and obligations owed to decision-subjects [18]–[21].

Despite this growing body of literature, there remains an important gap in connecting algorithmic transparency with the doctrinal structure of administrative law in digital public services. Existing studies have substantially discussed AI adoption, public-sector capability, citizen acceptance, explainable AI, algorithmic trust, and the philosophical basis of the right to explanation. However, fewer studies have formulated algorithmic transparency as a concrete administrative-law obligation that requires government agencies to explain the logic of digital systems to citizens affected by AI-assisted public service decisions. This article addresses that gap by developing the concept of the right to explanation in AI-based public services as part of administrative due process, reason-giving, and good administration. The study aims to analyse how algorithmic transparency should be constructed as a legal duty of government in digital public service delivery, to identify the administrative-law principles that justify such a duty, and to propose a normative framework through which citizens can obtain meaningful explanations of algorithmic decisions that affect their rights, interests, or access to public services.

2. RESEARCH METHODS

This study employs a normative juridical research method with a doctrinal and conceptual orientation. The method is appropriate because the central issue examined in this article concerns the legal construction of algorithmic transparency as an administrative obligation of government in digital public services. Rather than measuring the technical performance of artificial intelligence systems, this study analyses whether and how public authorities are legally required to explain the logic, criteria, and consequences of algorithmic decision-making to citizens affected by AI-based public services. The normative juridical approach enables the research to examine principles of administrative law, including legality, due process, reason-giving, accountability, proportionality, non-discrimination, and good administration, as the doctrinal foundation for developing the concept of the right to explanation in public-sector AI [11]–[13].

The research applies three main approaches: the statutory approach, the conceptual approach, and the comparative approach. The statutory approach is used to examine the legal norms governing administrative decision-making, digital government, public service delivery, electronic governance, and personal data protection. Through this approach, the study identifies whether existing legal frameworks already provide sufficient normative grounds for requiring government institutions to explain automated or AI-assisted administrative decisions. The conceptual

approach is used to clarify key concepts such as algorithmic transparency, explainable artificial intelligence, automated decision-making, administrative due process, and the right to explanation. This approach is essential because the right to explanation remains a developing legal concept and has not yet been uniformly defined in administrative law scholarship [14]–[17]. Meanwhile, the comparative approach is used to draw analytical lessons from global debates on AI governance and algorithmic accountability, particularly in jurisdictions that have discussed transparency, explanation, and contestability in automated public decision-making.

The legal materials used in this study consist of primary, secondary, and tertiary legal materials. Primary legal materials include statutes, administrative regulations, public service norms, data protection rules, and legal principles relevant to digital public administration. Secondary legal materials consist of peer-reviewed journal articles, academic books, research reports, and scholarly commentaries discussing artificial intelligence in government, algorithmic decision-making, explainable AI, administrative law, and the right to explanation. Tertiary legal materials include legal dictionaries, encyclopaedias, and institutional glossaries that assist in clarifying technical and legal terminology. The selection of secondary sources prioritises recent peer-reviewed literature published within the last five years in order to ensure that the analysis reflects current developments in AI governance and digital public administration [1]–[10], [18]–[25].

Data collection is conducted through library research by identifying, selecting, and reviewing legal instruments and academic literature relevant to algorithmic transparency in public service delivery. The literature is selected based on several criteria: relevance to public-sector AI or automated decision-making; connection to administrative law, public accountability, or procedural fairness; discussion of transparency, explainability, or the right to explanation; publication in reputable academic journals; and availability of DOI or other verifiable publication metadata. This selection strategy is intended to ensure that the study is based on reliable, traceable, and academically accountable sources. The materials are then classified into thematic categories, namely: AI adoption in public administration, algorithmic transparency, explainable AI, administrative due process, data protection, citizen trust, and legal accountability.

The analysis is conducted using qualitative legal analysis through interpretation, systematisation, and legal reasoning. First, the relevant legal norms and principles are interpreted to identify their implications for algorithmic decision-making in public services. Second, the findings from legal instruments and academic literature are systematised to construct a coherent relationship between administrative law principles and the emerging demand for algorithmic explanation. Third, legal reasoning is used to formulate the right to explanation as a normative extension of the government's duty to provide reasons, ensure procedural fairness, and maintain accountability in administrative decision-making. In this stage, the study distinguishes between technical transparency, which concerns the internal operation of an algorithmic system, and legal transparency, which concerns the citizen's right to receive a meaningful, understandable, and contestable explanation of a public decision.

To strengthen the validity of the analysis, this study applies source triangulation by comparing legal norms, doctrinal arguments, and contemporary scholarly findings. This triangulation is important because algorithmic transparency is an interdisciplinary issue located at the intersection of law, public administration, ethics, and information technology. The study does not rely solely on technical literature on explainable AI, but situates such literature within the normative structure of administrative law. Accordingly, the research evaluates whether explanations produced by AI systems are sufficient from a legal perspective, especially when they affect citizens' rights, obligations, or access to public services. This allows the study to avoid reducing the right to explanation to a merely technological feature and instead position it as part of administrative legality and democratic accountability.

The scope of this study is limited to the normative and doctrinal construction of algorithmic transparency in digital public services. It does not conduct empirical testing of specific AI systems used by government agencies, nor does it assess the accuracy of particular algorithmic models. The limitation is intentional because the primary objective of this research is to develop a legal framework for understanding the government's obligation to explain algorithmic decision-making. By focusing on administrative law, this study contributes to the literature by offering a normative model in which the right to explanation is treated not only as a data protection issue, but also as an essential component of lawful, accountable, and citizen-centred public administration.

3. RESULTS AND DISCUSSION

3.1. Algorithmic Transparency as a Legal Requirement in Digital Public Administration

The findings of this study indicate that algorithmic transparency in digital public services should be understood as a legal requirement rooted in administrative law, not merely as a technical or ethical preference. In conventional public administration, every administrative decision must be based on lawful authority, proper procedure, rational justification, and accountability. These requirements remain applicable when public authorities use artificial intelligence, automated decision-making, or algorithmic systems in delivering public services. Therefore, the use of AI in public administration does not reduce the government's legal responsibility; rather, it expands the need for clear justification because the decision-making process becomes more complex and less visible to citizens.

Algorithmic systems may assist public officials in classifying applications, prioritising services, detecting risks, verifying eligibility, or recommending administrative outcomes. However, such systems cannot be treated as independent legal actors. From the perspective of administrative law, the responsible subject remains the public institution or official that adopts, operates, and relies on the system. This means that an administrative body cannot avoid responsibility by claiming that a decision was produced by an algorithm. The government must still be able to explain the legal basis, factual considerations, data used, decision criteria, and institutional responsibility behind every AI-assisted decision affecting citizens.

This finding is consistent with Williams, who argues that administrative law must be rethought in response to algorithmic decision-making because traditional doctrines such as reason-giving, reviewability, and procedural fairness are challenged by technical opacity [11]. Covilla similarly emphasises that artificial intelligence may support administrative discretion, but it cannot eliminate the duty of care, the obligation to give reasons, and the possibility of judicial or administrative review [12]. These arguments confirm that algorithmic transparency should be positioned as part of the principle of legality in digital public administration. A public decision is not legally sufficient merely because it is generated efficiently; it must also be explainable, accountable, and open to challenge.

The study also finds that transparency in algorithmic public services should not be equated with full technical disclosure. Publishing source code, mathematical models, or system architecture may be useful for expert audits, but such information is often too technical for ordinary citizens. Administrative-law transparency requires explanations that are meaningful for the affected person. Citizens need to understand whether an automated system was used, what function it performed, what data were considered, what criteria influenced the result, and how the decision can be contested. This finding aligns with De Bruijn, Warnier, and Janssen, who warn that explainable AI may create new risks when explanations are too technical, incomplete, or misleading [4]. Therefore, the legal meaning of algorithmic transparency must be oriented toward intelligibility, contestability, and accountability.

In this sense, the black box problem is not only a technological problem but also an administrative-law problem. A decision may be statistically accurate from a technical perspective, yet legally problematic if the government cannot provide a clear and understandable justification to the affected citizen. Von Eschenbach explains that the lack of transparency in AI systems is closely related to distrust because individuals are asked to accept decisions produced by systems they cannot understand [18]. Günther and Kasirzadeh further argue that algorithmic and human decision-making cannot always be measured by the same transparency standards because algorithmic systems create distinct risks, including scale, repetition, hidden bias, and systemic opacity [19]. In the public sector, these risks are more serious because algorithmic decisions may determine access to public benefits, administrative services, or legal entitlements.

Based on these findings, this study argues that algorithmic transparency must be constructed as a legal duty of government. The duty includes the obligation to disclose the use of AI systems, explain their administrative function, provide understandable reasons for AI-assisted decisions, and ensure that citizens have access to review or objection mechanisms. Thus, algorithmic transparency is not an optional feature of digital government. It is an essential requirement for maintaining legality, accountability, proportionality, non-discrimination, and good administration in public service delivery.

3.2. The Right to Explanation as an Instrument of Administrative Due Process

The second finding of this study is that the right to explanation should be conceptualised as an instrument of administrative due process in AI-based public services. Due process requires that citizens affected by administrative decisions must be given a fair opportunity to understand, respond to, correct, and challenge government action. In traditional administrative practice, this requirement is fulfilled through notification, access to reasons, the opportunity to be heard, administrative objection, and judicial review. In digital public administration, these safeguards must be adapted to address decisions influenced by algorithmic systems.

The right to explanation becomes necessary because AI-based systems can create a distance between citizens and public officials. In conventional service delivery, citizens may directly ask officials about the reason for rejection, delay, classification, or administrative treatment. In automated services, however, citizens often encounter digital interfaces that provide only final outcomes without adequate explanation. This condition may weaken procedural fairness because citizens cannot identify whether the decision was based on incorrect data, irrelevant criteria, discriminatory assumptions, or improper administrative reasoning. Therefore, the right to explanation functions as a bridge between digital automation and administrative justice.

This study identifies four minimum elements of the right to explanation in AI-based public services. First, citizens must be informed when an AI-based or automated system is used in an administrative process. Second, citizens must receive a general explanation of the system's function, logic, and decision criteria. Third, affected individuals must receive an individualised explanation of the main factors that influenced the decision in their specific case. Fourth, citizens must be given access to correction, objection, appeal, or meaningful human review. These elements show that the right to explanation is not merely a right to obtain information, but also a procedural guarantee that enables citizens to defend their rights and interests.

The findings are related to Kim and Routledge, who argue that the right to explanation is grounded in trust between decision-makers and decision-subjects [14]. In public administration, trust is not merely a psychological issue but a condition for the legitimacy of state action. Vredenburg also argues that the right to explanation is necessary to respond to opaque algorithmic power, particularly when individuals are affected by decisions they cannot understand or contest [15]. However, Taylor warns that the right to explanation must be formulated carefully so that it does not remain an abstract moral claim without clear institutional content [16]. This study responds to that concern by placing the right to explanation within administrative due process, reason-giving, and reviewability.

The citizen-centred character of explanation is also essential. Explanation must be understandable, relevant, and useful for the person affected by a public decision. It should answer practical questions: whether an algorithm was used, what role the algorithm played, what data or indicators were considered, why the decision affected the citizen in a particular way, and what remedies are available. This finding is consistent with Rizk and Lindgren, who argue that automated decision-making changes the decision space between public officials and citizens [2]. Aoki et al. also show that the type of explanation provided by government affects citizens' perceptions of accuracy, fairness, and trustworthiness in algorithmic decisions [1]. Similarly, Gesk and Leyer find that citizens' acceptance of AI in public services depends on context, perceived risk, and the justification provided for AI use [3].

The right to explanation should also be distinguished from general data protection rights. Data protection law is important because AI systems often process personal data, but the right to explanation in public services has a broader administrative-law function. It protects citizens not only from unlawful data processing but also from arbitrary administrative decisions, hidden discretion, procedural unfairness, and unreviewable public authority. Rudolf and Kovač correctly note that automated decision-making creates challenges at the intersection of administrative procedure and data protection [13]. However, from an administrative-law perspective, the key issue is not only whether data are processed lawfully, but whether the state can justify the decision produced through such processing.

Accordingly, this study finds that the right to explanation should be recognised as part of the government's duty to give reasons in digital public administration. The citizen does not need to receive every technical detail of the AI model, but must receive sufficient information to understand the essential basis of the decision. The explanation must be clear enough to support objection, correction, and review. Without this right, AI-based public services may become efficient but procedurally weak, because citizens are placed in a passive position before systems they cannot understand or challenge.

3.3. Normative Framework for Accountable AI-Based Public Services

The third finding of this study is that algorithmic transparency and the right to explanation require an integrated normative framework. AI-based public services cannot be governed only through technical standards or ethical guidelines. They require clear legal obligations, institutional responsibility, procedural safeguards, and mechanisms for citizen remedies. Without such a framework, the use of AI in public administration may produce black-box governance, where public decisions are formally issued by government institutions but substantively shaped by opaque systems.

This study proposes six core obligations for accountable AI-based public services. First, the government must disclose the use of AI or automated decision-making systems in public service delivery. Second, the government must provide general information about the purpose, function, and scope of the system. Third, public institutions must explain the main criteria, data categories, and decision logic used in the administrative process. Fourth, affected citizens must receive an individualised explanation of the factors that influenced the decision. Fifth, citizens must have access to correction, objection, appeal, or human review. Sixth, government agencies must maintain documentation, audit trails, and accountability mechanisms to support administrative and judicial review.

This framework may be organised into three levels of transparency. The first is institutional transparency, which concerns public disclosure of the existence, purpose, and governance of AI systems used by public authorities. The second is procedural transparency, which concerns how algorithmic systems are integrated into administrative decision-making, including human oversight, documentation, and review procedures. The third is individual transparency, which concerns the explanation provided to a specific citizen affected by a particular decision. These three levels are interconnected. Institutional transparency supports public trust, procedural transparency strengthens legality, and individual transparency protects due process.

The framework also requires meaningful human responsibility. Public officials must not merely approve algorithmic outputs without understanding their basis. Human oversight must be substantive, not symbolic. A public official should be able to review the data used, assess the relevance of algorithmic recommendations, identify potential errors, and override the system when necessary. If human oversight is reduced to automatic approval, it fails to protect citizens from arbitrary or erroneous algorithmic decisions. This finding is consistent with Meijer, Lorenz, and Wessels, who show that algorithmisation reshapes bureaucratic routines and organisational practices [10]. Ahn and Chen also show that AI adoption in government depends on public employees' perceptions, capacity, and institutional readiness [6].

Organisational capacity is therefore a central part of accountable AI governance. Selten and Klievink argue that public-sector AI adoption requires institutional arrangements that balance separation and integration of AI capabilities [8]. Van Noordt and Misuraca also show that AI use in the public sector raises governance, ethical, and organisational challenges across government institutions [7]. Similarly, Mikalef et al. emphasise that AI capability in government agencies depends on organisational, technological, and human determinants [23]. These studies support the finding that algorithmic transparency cannot be implemented effectively without trained officials, clear procedures, documentation systems, audit mechanisms, and citizen complaint channels.

Compared with previous studies, the contribution of this research lies in translating the abstract idea of explainable AI into administrative-law obligations. Previous research has discussed AI adoption, citizen trust, public-sector capability, and explainable AI [1], [3], [5], [7], [23]. Other studies have examined the philosophical and ethical foundation of the right to explanation [14]–[17]. However, this study places the right to explanation specifically within the structure of administrative law. It argues that algorithmic transparency should be treated as part of the government's duty to give reasons, ensure due process, and maintain accountability in public service decisions.

Overall, the analysis shows that AI-based public services can improve efficiency, consistency, and administrative capacity, but they also create risks of opacity, bias, and weakened procedural protection. Therefore, digital innovation in public administration must be accompanied by legal safeguards. The right to explanation provides such a safeguard by ensuring that citizens are not merely objects of automated governance, but remain legal subjects who are entitled to understand and challenge decisions affecting them. In this sense, algorithmic transparency is not only a matter of technological governance; it is a requirement of lawful, accountable, and citizen-centred public administration.

4. CONCLUSION

This study concludes that algorithmic transparency in digital public services must be understood as a legal obligation within administrative law, rather than merely as an ethical principle or technical feature of AI governance. The use of artificial intelligence and automated decision-making in public administration does not alter the fundamental requirement that every public decision must remain lawful, reasoned, accountable, and open to review. Therefore, when government institutions use algorithmic systems to support or influence administrative decisions, they must be able to explain the legal basis, data considerations, decision criteria, and institutional responsibility behind those decisions.

The main finding of this study is that the right to explanation should be constructed as an essential component of administrative due process in AI-based public services. This right is not limited to the disclosure of technical information about an algorithm, nor does it require citizens to understand complex computational models. Rather, it requires the government to provide meaningful, understandable, and case-relevant explanations to individuals affected by algorithmic decisions. Such explanations must enable citizens to know whether AI was used, how it influenced the decision, what factors were considered, and what legal remedies are available. In this sense, the right to explanation serves as a procedural safeguard against black-box administration, hidden discretion, discriminatory outcomes, and unreviewable digital governance.

The novelty of this study lies in its effort to place algorithmic transparency within the doctrinal structure of administrative law. Previous studies have examined AI adoption in government, citizen trust, explainable AI, algorithmic accountability, and the philosophical foundation of the right to explanation. However, many of those studies have not sufficiently translated the right to explanation into concrete administrative-law obligations. This article contributes to the existing literature by proposing that the right to explanation should be linked to the government's duty to give reasons, ensure due process, maintain human responsibility, and provide accessible mechanisms for objection or review. Thus, the study moves the debate from a general discussion of ethical AI toward a more specific legal framework for accountable AI-based public services.

The findings also have implications for previous research on AI and public administration. Studies that emphasise public trust and acceptance of AI in government show that citizens are more likely to accept algorithmic systems when they perceive them as fair, accurate, and explainable. This study strengthens those findings by arguing that trust cannot be secured only through better communication or technical explainability. In the context of public administration, trust must be supported by legal guarantees. Similarly, studies on administrative discretion and automated decision-making have shown that AI may reshape the relationship between citizens and public officials. This study extends that argument by demonstrating that such transformation requires a renewed model of administrative accountability, especially through meaningful human oversight and individualised explanation.

Nevertheless, this study has limitations. It is normative and doctrinal in character, so it does not empirically test how specific government agencies currently use AI systems in public service delivery. It also does not examine the technical architecture of particular algorithmic models or measure citizens' actual understanding of AI-generated explanations. These limitations are important because the legal concept of the right to explanation will ultimately need to be tested against real administrative practices, institutional capacities, and citizens' experiences in accessing public services.

Future research should therefore conduct empirical studies on the implementation of AI-based decision-making in public institutions, particularly in sectors such as social assistance, licensing, taxation, population administration, health services, and public complaints management. Further studies may also compare how different jurisdictions regulate algorithmic transparency and whether existing administrative procedures are sufficient to accommodate AI-based decisions. In addition, interdisciplinary research involving law, public administration, computer science, and ethics is needed to design explanation models that are not only technically accurate but also legally meaningful and understandable for citizens. Such research would strengthen the development of citizen-centred AI governance and ensure that digital innovation in public administration remains compatible with legality, accountability, and the protection of citizens' rights.

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