**The Chartered Governance
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By online survey: https://dsit.qualtrics.com/jfe/form/SV_cYXmLLovHHNMJWS

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Dear Sir / Madam

The Chartered Governance Institute is the professional body for governance and the qualifying and membership body for governance professionals across all sectors. Its purpose under Royal Charter is to lead effective governance and efficient administration of commerce, industry, and public affairs working with regulators and policymakers to champion high standards of governance and providing qualifications, training, and guidance. As a lifelong learning partner, the Institute helps governance professionals achieve their professional goals, providing recognition, community, and the voice of its membership.

One of nine divisions of the Chartered Governance Institute, which was established 130 years ago, The Chartered Governance Institute UK & Ireland represents members working and studying in the UK and Ireland and many other countries and regions including the Caribbean, parts of Africa and the Middle East.

As the professional body that qualifies Chartered Secretaries and Chartered Governance Professionals, our members have a uniquely privileged role in companies' governance arrangements. They are therefore well placed to understand the issues raised by this consultation document. In preparing our response we have consulted, amongst others, with our members. However, the views expressed in this response are not necessarily those of any individual members, nor of the companies they represent.

Our views on the questions asked in your consultation paper are set out below.

General comments

The AIME tool provides a clear framework for organisations to assess and improve AI governance. It helps users address key areas like risk management, transparency, and ethics, making it suitable for organisations at all stages of AI maturity. The decision to implement an interactive decision tree format will make the tool easier to use, especially for smaller organisations. Tailoring questions to users' needs would simplify the process and reduce burdens. However, some questions are too complex for organisations with limited resources. We would suggest simplifying language and provide clearer guidance to make the tool more accessible. Moreover, while the focus on transparency and accountability is a strength, the tool should include questions on staff training to address evolving AI risks. Finally, while embedding AIME in government procurement will encourage responsible AI practices it risks disadvantaging SMEs. Simplify the tool or offer support to ensure fair competition.

With these improvements, the AIME tool can promote responsible AI effectively across all organisations.

Specific questions asked in the consultation form

What are your general impressions of the AIME tool?

The AIME tool provides a well-crafted and structured framework for organisations to assess their AI governance practices. It covers essential aspects of responsible AI, helping organisations understand the various governance and ethical considerations involved. Overall, it is a practical tool that promotes self-assessment and encourages organisations to adopt best practices in AI management.

Does the overall structure of the tool make sense? Why/why not?

Yes, the overall structure of the tool makes sense. It starts with foundational questions about AI governance and then moves into more specific areas such as risk management, ethics, and transparency. This logical progression helps users build their understanding step-by-step. However, some sections overlap slightly, and this could be streamlined to avoid redundancy and enhance clarity.

Would you change the order of any of the sections/questions? If yes, which questions and why?

Yes, we recommend moving the **"Risk Management"** section closer to the beginning. This is because risk management is a priority for organisations and addressing it early would help them focus on immediate actions and priorities. We also suggest moving the **"Ethical AI"** and **"Bias and Fairness"** questions closer to the end, as these are more complex and often build upon the foundational issues like risk management and transparency.

We are planning to format the final version of the tool as an interactive decision tree (loosely based on the Cyber Essentials readiness tool). Do you agree that this format is intuitive/easy to use? Why/why not?

Yes, we agree that an interactive decision tree format would be intuitive and easy to use. The decision to use a "tree approach" allows a step-by-step guide, simplifying the process of answering questions based on prior responses. This format is particularly helpful for organisations with limited resources, as it helps them navigate the tool more effectively and provides immediate feedback, making it easier to implement responsible AI practices in a manageable way.

Are there any questions that you think are difficult to answer? If yes, what are they? Why are they difficult to answer?

Yes, some questions, particularly in the sections on **"Ethical AI"** and **"Bias and Fairness"**, could be challenging for organisations to answer, especially those without dedicated AI governance teams. For example, questions about **"how AI systems are audited for fairness"** may be difficult for smaller organisations or those early in their AI adoption, as they might not have established audit processes yet. These questions could be made easier by offering clearer guidance and/or simpler language.

Are there any questions that you think are superfluous/unnecessary? If yes, what are they? Why are they superfluous/not needed?

Some questions, like **"Number of staff dedicated to AI governance"**, may be less relevant for smaller organisations or start-ups with limited resources. For such organisations, AI governance responsibilities might be shared across various roles, rather than having a dedicated team. It may be more useful to frame this question in terms of how governance responsibilities are distributed, rather than focusing on specific staffing numbers.

Are there any questions that you particularly liked or would find helpful for improving your internal processes? If yes, what are they? Why are they helpful/appealing?

We found the questions related to **"Transparency"** and **"Accountability"** in AI systems particularly helpful. For example, the question on **"how AI systems are transparent and explainable to external stakeholders"** is valuable as it encourages organisations to think about the accessibility and clarity of their AI models. These questions are helpful because they promote better communication with stakeholders and ensure that AI systems can be audited and understood by non-technical audiences.

Are there any necessary conditions, statements, or processes that you feel are missing that organisations should be implementing? What are they?

One area that could be strengthened is the **"Ongoing Training and Awareness"** for employees in AI governance. Organisations should be encouraged to implement regular training programmes for their staff on AI risks, ethics, and governance. This would help ensure that AI governance is not just a one-off exercise but an ongoing focus. A question on the frequency and content of AI governance training would be help ensure continuous engagement with responsible AI practices.

Is the tool overly burdensome or unrealistic for the target audience, (i.e., organisations with limited resources to extensively engage with AI governance frameworks, for example, start-ups and SMEs)?

The tool could be seen as burdensome for smaller organisations or start-ups with limited resources, particularly in terms of questions requiring advanced AI governance processes. Many questions assume a level of maturity in AI management that smaller organisations may not yet have achieved. However, the tool's interactive decision tree format can help mitigate this by tailoring the questions based on the user's responses, offering a more manageable version for those with fewer resources.

We are exploring the possibility of embedding AIME in government procurement frameworks. In this model, organisations supplying government with AI products and services would be required to complete the tool to demonstrate baseline responsible AI management processes. Do you agree that this would incentivise organisations to implement responsible AI management systems?

Yes, embedding AIME in government procurement frameworks could incentivise organisations to implement responsible AI management systems. By making responsible AI practices a requirement for government contracts, organisations will be more motivated to adopt these to remain competitive. This could also raise the overall standard of AI governance across the sector, especially if it becomes a baseline for entering the market.

Do you believe that embedding AIME in government procurement processes could have an adverse effect on competition (e.g., add disproportionate burden on SMEs, who may have less resources/capacity to fill out a tool like this, compared to larger organisations)?

Yes, embedding AIME in government procurement could place a disproportionate burden on SMEs. Smaller organisations may struggle to fully engage with the tool due to limited resources, particularly when they are still in the early stages of developing AI governance frameworks. This could lead to a competitive disadvantage for SMEs compared to larger organisations, which may have more dedicated resources for governance activities. To mitigate this, it might be useful to provide SMEs with a simplified version of the tool or additional support, ensuring they are not unfairly excluded from government procurement opportunities.

If you would like to discuss any of the above comments in further detail, please do feel free to contact me.

Yours faithfully,

Valentina Dotto
Policy Adviser
The Chartered Governance Institute UK & Ireland