**The Chartered Governance
Institute UK & Ireland**

Saffron House
6-10 Kirby Street
London EC1N 8TS

+44 (0)20 7580 4741
info@cgi.org.uk
cgi.org.uk

By online survey

AI Skills for Business Competency Framework Draft framework for public consultation
Link: final_bridgeai_framework.pdf (turing.ac.uk)

7th January 2024

Dear Sir / Madam,

The Chartered Governance Institute UK & Ireland 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 to achieve their professional goals, providing recognition, community, and the voice of its membership.

One of nine divisions of the global 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 in 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.

Personas
To what extent do you agree that this guidance will support employers to understand their organisation's AI upskilling needs and consider associated training needs? (1=strongly disagree, 5 = strongly agree)
3
Please provide comments

As a first step, this guidance helps employers understand AI upskilling needs and consider associated training requirements. However, it is currently quite technical; including more examples and/or case studies would make it easier to read, digest, and implement.

Regarding employees, while the guidance might be useful for certain departments in a company (i.e., legal, compliance, and data protection), it does not offer guidance on how to upskill the broader workforce in the company. In this sense, some of the requirements are both overbroad and overly specific.

It would be useful to see upcoming sector-specific guidance on this. They should align with this one as well as offer consistency across sectors in the recommendations given.

To what extent do you agree that the guidance addresses the right learner personas for individuals within an organisation? Are there others that should be considered? (1=strongly disagree, 5 = strongly agree)

3

To what extent do you agree that the persona 'AI Citizen' is well defined and represents a useful categorisation for individuals within your organisation? (1=strongly disagree, 5 = strongly agree)

3

To what extent do you agree that the persona 'AI Worker' is well defined and represents a useful categorisation for individuals within your organisation? (1=strongly disagree, 5 = strongly agree)
3

To what extent do you agree that the persona 'AI Professional' is well defined and represents a useful categorisation for individuals within your organisation? (1=strongly disagree, 5 = strongly agree)
3

To what extent do you agree that the persona 'AI Leader' is well defined and represents a useful categorisation for individuals within your organisation? (1=strongly disagree, 5 = strongly agree)
3

Dimensions
In regards to Dimension A: Data Privacy and Stewardship: To what extent do you agree that this dimension has been accurately articulated and contains the set of skills you would expect in this category? (1=strongly disagree, 5 = strongly agree)

4

In regards to Dimension B: Definition, acquisition, engineering, architecture storage and curation: To what extent do you agree that this dimension has been accurately articulated and contains the set of skills you would expect in this category? (1=strongly disagree, 5 = strongly agree)

4

In regards to Dimension C: Problem definition and communication: To what extent do you agree that this dimension has been accurately articulated and contains the set of skills you would expect in this category? (1=strongly disagree, 5 = strongly agree)
4

In regards to Dimension D: Problem solving, analysis, modelling, visualisation: To what extent do you agree that this dimension has been accurately articulated and contains the set of skills you would expect in this category? (1=strongly disagree, 5 = strongly agree)
4

In regards to Dimension E: Evaluation and Reflection: To what extent do you agree that this dimension has been accurately articulated and contains the set of skills/values you would expect in this category? (1=strongly disagree, 5 = strongly agree)

4

To what extent do you agree that the five dimensions of the framework address the right skills and values related to AI projects? Are there others that should be considered? (1=strongly disagree, 5 = strongly agree)
3
Please provide comments

While we generally concur with the dimensions and their associated skill requirements, obtaining some of these skills for the general workforce may necessitate substantial and ongoing training efforts. This could pose a significant burden for smaller companies if attempted all at once. To address this, we propose a more phased approach, distinctly categorising skills as essential and desirable, accompanied by a structured framework for learning progression. This would provide a clearer pathway for skill acquisition, making the training process more manageable and practical, particularly for smaller businesses.

Final comments
We recommend a more consistent utilisation of the definition of AI, preferably aligning it with the definition used in other legislative proposals, such as the AI Act, which employs the OECD definition of AI. The use of multiple AI definitions can lead to confusion. A shared definition of AI is crucial for fostering a common understanding among researchers, policymakers, and industry leaders, enabling them to better comprehend the capabilities and limitations of AI. Furthermore, a unified definition contributes to promoting the responsible and ethical use of AI uniformly across sectors.

Finally, we make three suggestions to improve the framework:

1. Revising the current approach to expectations for technical knowledge, aiming for a more balanced and realistic perspective that acknowledges its aspirational nature.

2. Expanding the definition of risk to encompass not only technological aspects but also stakeholders and consumers, mirroring the comprehensive perspective outlined in the EU AI Act.

3. Reconsider the narrow focus of job roles and associated training. On this we suggest a shift towards a broader and more transferable skill set at various levels of responsibility, promoting adaptability and overall effectiveness.