AI Management Essential tool

Submission to the Department for Science, Innovation and Technology

Chartered Institute of Personnel and Development (CIPD)
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About the CIPD

The CIPD is the professional body for HR and people development. The not-for-profit organisation champions better work and working lives and has been setting the benchmark for excellence in people and organisation development for more than 100 years.

It has 160,000 members across all sectors and sizes of organisation and provides thought leadership through independent research on the world of work, and offers professional training and accreditation for those working in HR and learning and development.

Public policy at the CIPD draws on our extensive research and thought leadership, practical advice and guidance, along with the experience and expertise of our diverse membership, to inform and shape debate, government policy and legislation for the benefit of employees and employers. It also seeks to promote and improve best practice in people management and development and to represent the interests of our members.

Our response

1. ***What are your general impressions of the AIME tool?***

It's clear and easy to understand

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

These definitions need to be clearer: the types of AI and purposes of AI that fall in the scope of this tool, and the definition for 'developing your AI'. Does it mean developing your own LLM or SLM, or leveraging an open source or vendor's tool?

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

Fairness and bias mitigation questions could be grouped together.

4. ***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- the format makes sense. It would be helpful to see example documents/frameworks at the end of a branch and also a score with an indication of the key areas to remedy.

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

Yes - fairness and bias and impact. Unless you have millions to invest, mitigating the effects of fairness and bias in generative AI training data is an impossible task. Users need more pragmatic ideas on issues that we may encounter.

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

No

7. ***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?***

1. In terms of improving processes, a key question would be who is the audience for this policy and who should own it?

2. Q4.1.1 on AI's impact on 'the legal position or life opportunities of individuals' could be rephrased more simply as 'pay, jobs or life opportunities of individuals'. Section 4 (impact assessment) is a helpful prompt to look beyond the AI system and consider its impact on individuals, societies and environment.

We're assuming that these questions are in order of importance and all of them need to be answered positively to be seen as having a robust AI management policy.

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

The scale/organisation needed to support and manage AI effectively. At the moment AI is, 'as well as' not 'instead of' current processes. Particularly generative AI, you need to skill people up, allow time for learning. It does require a headcount increase to accommodate which is an important part of the AI management puzzle.

9. ***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)***

Yes- most organisations initially encounter AI because their people are using it for their personal lives and then their business lives. People need a light framework (before the organisation invests in AI for their customers) to understand when/how to use it and watch outs in terms of company/customer data privacy.

10. 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?

This would severely limit the pool and government's ability to take advantage of innovation for less mature types of AI. Generative AI has gone mainstream only in the last two years. For vendors looking to work with government we would focus on fairness/bias and data protection. The rest would have to be developed between the vendor and government.

11. ***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- perhaps more support could be given to help SMEs to comply to level the playing field.