

Understanding Responsibilities in AI Practices

Guidance for understanding roles and responsibilities to ensure responsible artificial intelligence (AI) practices.

December 2024

© State of New South Wales through The Department of Customer Service 2024. Information contained in this publication is based on knowledge and understanding at the time of writing, November 2024, and is subject to change.

1 Purpose

Responsible AI is a collective responsibility, encompassing all levels within an agency, from executives to end users. It is important that everyone understands their role in ensuring the safe and responsible use of AI. This module provides guidance for aligning responsibilities and accountability within your agency, based on ISO/IEC standards and in alignment with the [NSW AI Assessment Framework \(AIAF\)](#).

NSW government agencies can use this guidance to understand what responsible AI means in practice. Public servants are encouraged to consider integrating these responsibilities into performance plans where appropriate, as well as into AI awareness training content and internal processes for AI governance, assurance, and the evaluation, development, and operation of AI solutions.

2 How to Use

Responsibilities are outlined through standard roles for flexibility and organised under broader strategic objectives. The recommended approach to using this guidance is:

1. Identify the general role descriptions that best relate to your role by reviewing the 'Roles' section.
2. Review the responsibilities and consider how to integrate them within your team's existing workflows. If you manage direct reports, assess whether any responsibilities should be included in performance plans.
3. Implement the relevant changes.

3 Roles & Responsibilities

While executives within Agencies are ultimately accountable for the safe and responsible use of AI technologies, ensuring responsible AI use involves everyone within an agency, not just technical or product teams.

This guidance should be used to enhance existing structures, allowing agencies to define and assign AI-related responsibilities that best meet their unique operational needs.

3.1 Roles

3.1.1 Executive level

Definition: Senior leaders and decision-makers in the organisation, such as CEOs, CFOs, CIOs, CDOs, and department heads.

Responsibilities: Setting strategic direction, approving major initiatives, and ensuring overall accountability and governance.

3.1.2 Management Level

Definition: Mid-level leaders responsible for overseeing specific functions or departments within the organisation, with a strong focus on governance, assurance, cybersecurity, legal, record keeping, ethics, policy, and risk management.

Responsibilities: Implementing strategies, managing teams, ensuring compliance with policies, and reporting to the executive level.

3.1.3 Product Owners

Definition: Individuals responsible for the development and success of products or projects that incorporate AI.

Responsibilities: Defining product vision, prioritising features, coordinating with development teams, and ensuring alignment with business objectives, policies and regulation.

3.1.4 Users

Definition: Individuals who interact with AI systems as part of their daily tasks or roles within the organisation.

Responsibilities: Using AI systems as intended, providing feedback on usability and performance, and adhering to usage guidelines.

3.1.5 Everyone

Definition: All members of the organisation, encompassing every role and level.

Responsibilities: Understanding and adhering to responsible AI practices, contributing to a culture of ethical AI use, and reporting any concerns or issues.

3.2 Responsibilities

The RACI matrices provided are to assist agencies in considering different roles and responsibilities. They are organised under broad strategic objectives to support the establishment of responsible AI practices.

3.2.1 Foster a responsible AI Culture

ACTION	ACCOUNTABLE	RESPONSIBLE	CONSULTED	INFORMED
<ul style="list-style-type: none"> Promote a culture of responsible AI by integrating NSW AI ethics principles in business objectives, values, and communications. 	Executive level	Management Level	Users	Users
<ul style="list-style-type: none"> Periodically review organizational awareness of individual responsibilities outlined in this guidance to ensure responsible AI use. 	Executive level	Management Level	Users	Everyone
<ul style="list-style-type: none"> Regularly evaluate the impact of AI on the workforce to enhance strategic workforce planning, identifying needed skills and resources. 	Executive level	Management Level	Users	Everyone
<ul style="list-style-type: none"> Ensure product teams collaborate with legal, data, privacy and AI experts when AI is used. 	Executive level	Management Level	Product Owners	-
<ul style="list-style-type: none"> Encourage innovation and responsible AI development through initiatives like hackathons, competitions and collaborative research projects. 	Executive level	Management Level	Everyone	Everyone
<ul style="list-style-type: none"> Report if you believe a solution you're using may influence decisions or actions that could be unethical, illegal, or unsafe. 	Everyone	Everyone	Management Level	Executive level

3.2.2 Ensure Accountability and transparency

ACTION	ACCOUNTABLE	RESPONSIBLE	CONSULTED	INFORMED
<ul style="list-style-type: none"> Clearly define and communicate responsible AI-related authorities within the organisation, including governance, assurance, procurement, ethics, cyber, privacy, legal, technology, data governance, and risk management. 	Executive level	Management Level	-	Everyone
<ul style="list-style-type: none"> Review and endorse the AI Assessment Framework (AIAF) compliance plans ^[1], detailing Department/Agency progress towards compliance in ensuring use of the AIAF. 	Executive level	Management Level	-	-
<ul style="list-style-type: none"> Ensure each AI solution has documented accountabilities for managing risks, ensuring continuity, enabling appeals, and providing evidence for decisions and actions. 	Management Level	Product Owners	Product Owners	Executive level
<ul style="list-style-type: none"> Ensure record-keeping for decisions related to managing the risk of AI solutions such the results of applying the AIAF and risk mitigations. 	Executive level	Product Owners	Management Level	-
<ul style="list-style-type: none"> Publish regular transparency reports for high-risk or customer-facing AI systems, detailing use cases, performance, governance practices, and any incidents or interventions. 	Executive level	Management Level	Product Owners	Everyone

[1] Compliance plans communicate departmental compliance with the AIAF, tracking implementation progress and raising awareness of challenges for support. Reporting requirements apply to department Governance and Assurance functions and are collated by Digital NSW through the AI Secretariat.

Allocate Resources

ACTION	ACCOUNTABLE	RESPONSIBLE	CONSULTED	INFORMED
<ul style="list-style-type: none"> Support initiatives to increase AI risk management awareness and capabilities at all levels of the organisation. 	Executive level	Management Level	Everyone	Users
<ul style="list-style-type: none"> Allocate budget and resources for responsible AI, including expert advisory services (legal, data, privacy, ethics, technology, risk). 	Executive level	Executive level	Management Level	Product Owners
<ul style="list-style-type: none"> Provide sufficient training and tools for ethical AI implementation. 	Management Level	Product Owners	-	Everyone
<ul style="list-style-type: none"> Ensure adequate resources for continuous monitoring and evaluation of AI systems that could cause harm. 	Executive level	Management Level	Product Owners	-
<ul style="list-style-type: none"> Reduce costs of digital governance and assurance with streamlined, integrated processes across cybersecurity, privacy, ethics, legal, AI, data governance, and technology & architecture domains. 	Executive level	Management Level	Product Owners	Everyone

3.2.3 Ensure Compliance and Risk Management

ACTION	ACCOUNTABLE	RESPONSIBLE	CONSULTED	INFORMED
<ul style="list-style-type: none"> Ensure governance and assurance oversight for compliance with AI-related laws and regulations (e.g., human rights, privacy, data protection, administrative law, consumer, anti-discrimination, state records, critical infrastructure and cyber security). 	Executive level	Management Level	Product Owners	-
<ul style="list-style-type: none"> Ensure AI system development complies with the NSW AI ethics policy, AI assessment framework, organisational values, and related standards. 	Executive level	Management Level	Product Owners	-
<ul style="list-style-type: none"> Ensure that high-risk AI projects and solutions are presented to the AI Review Board (AIRC). 	Executive level	Management Level	Product Owners	-
<ul style="list-style-type: none"> Approve AI project and solution risk tiering, treatment plans and accept residual risks. 	Executive level	Management Level	Product Owners	Executive level
<ul style="list-style-type: none"> Establish clear data governance policies for AI systems, including data collection, storage, and usage 	Executive level	Management Level	Product Owners	Everyone
<ul style="list-style-type: none"> Regularly review agency governance, risk, and compliance frameworks to ensure alignment with the AIAF and emerging AI regulatory guidance and legislation. 	Executive level	Management Level	Product Owners	Executive level
<ul style="list-style-type: none"> Evaluate vendors and third-party AI solutions for compliance with the NSW AI Ethics Policy, AIAF, and AI procurement guidance and framework 	Management Level	Product Owners	-	Everyone
<ul style="list-style-type: none"> Ensure compliance with Digital NSW, department, and agency policies and guidelines on using public, non-secure applications, such as generative AI chatbots (e.g., ChatGPT). 	Everyone	Everyone	Management Level	Executive level

Establish Oversight Mechanisms

ACTION	ACCOUNTABLE	RESPONSIBLE	CONSULTED	INFORMED
<ul style="list-style-type: none"> Create a multidisciplinary AI advisory board or committee to monitor and advise AI projects & solutions (ethics, legal, technology, data, privacy etc.) 	Executive level	Management Level	-	Everyone
<ul style="list-style-type: none"> Include external experts and stakeholders in Governance, Assurance, Audit, and advisory committees to ensure diverse perspectives. 	Executive level	Management Level	-	-
<ul style="list-style-type: none"> Designate a responsible owner for AI governance in the C-suite. 	Executive level	Executive level	-	Management Level
<ul style="list-style-type: none"> Ensure regular independent reviews of AI governance and assurance functions to assess performance and effectiveness. 	Executive level	Management Level	-	Everyone
<ul style="list-style-type: none"> Ensure that AI systems augment, rather than replace, human decision-making where its use could create harm. 	Executive level	Management Level	Users	Users
<ul style="list-style-type: none"> Ensure AI solutions with medium or higher risk have incident response plans, with tested, monitored, and communicated appeal processes that include human intervention. 	Executive level	Management Level	Product Owners	-
<ul style="list-style-type: none"> Ensure high-risk AI solutions can provide clear explanations for their outputs when required and have established mechanisms to trace AI decisions back to their source data and logic. 	Management Level	Product Owners	Users	Users
<ul style="list-style-type: none"> Ensure the use of AI solution benefits outweigh the risks 	Management Level	Product Owners	Users	-
<ul style="list-style-type: none"> Conduct audits at a frequency determined by potential risk to ensure AI systems meet data quality standards, desired outcomes, and NSW ethical policy. 	Management Level	Management Level	Product Owners	-

4 What's next?

By following this guidance, government agencies can better structure their approach to responsible AI, ensuring that all levels of the organisation are aligned and actively contributing to ethical AI practices.

Agencies should start by ensuring a Governance and Assurance function has clear accountability for overseeing responsible AI use.

Feedback

Agencies are encouraged to provide feedback for any suggested improvements to this guidance to the AI Secretariat (AIsecretariat@customerservice.nsw.gov.au).

Digital Strategy, Investment and Assurance team

Digital NSW

<https://www.digital.nsw.gov.au/policy/artificial-intelligence>