MIAA 2025/26 Checklist Series – Artificial Intelligence (AI) Governance

July 2025



Al and its governance implications

The NHS is undergoing a profound digital transformation. Al will impact 70% of NHS workflows by 2030. That projection from NHS England may seem dramatic, but we're already seeing Al embedded in diagnostics, scheduling and triage. This shift is not about the future, it's about governance now. Governance must evolve alongside the technology, and it must be multidisciplinary.

We're entering a period where digital systems are influencing clinical risk, operational decision making and even resource allocation. This means organisations must have the capability to understand, question and provide assurance on digital matters including AI.

Many organisations are still developing their assurance capabilities, but awareness is the first step toward readiness. As more organisations explore AI, automation and predictive analytics, Boards must ensure that risk appetite is well understood and aligned with organisational strategy.

Governance and assurance are central to safe AI deployment, but they must evolve because AI doesn't behave like traditional IT systems. The NHS does have emerging guidance. NHS England's *AI Assurance Framework*, NICE's evidence standards framework for digital health technologies and the *AI Code of Conduct*.

This latest MIAA checklist outlines some key areas of consideration as organisations develop their AI governance framework.



Al Governance Checklist

	Areas to consider	Organisation's Response
Al Governance & Readiness	Al Governance Framework Does your organisation have a clear, documented Al governance framework which includes roles, responsibilities and decision making processes	
	Ethics Oversight Is the AI governance framework aligned to ethical requirements including relevant ethic committees/group oversight, guidelines and documented ethical assessments of all AI projects?	
	Al Inventory Management Do you have a comprehensive inventory listing all AI systems in use within the organisation including their purposes and status?	
	Risk Management Processes Are AI initiatives included within the scope of the organisation's risk management processes including specific risk assessments, risks registers and risk mitigation plans?	



Areas to consider	Organisation's Response
Policy Integrations Are AI initiatives incorporated into ex organisational frameworks?	ting policies and

	Areas to consider	Organisation's Response
Data Management & Compliance	Data Protection Compliance Are AI initiatives assessed to ensure compliance with data protection legislation and frameworks e.g. Data Protection Impact Assessments (DPIAs), data processing agreements, and records of data handling practices? Data Quality Assurance What assurance mechanisms are in place to ensure the accuracy, completeness and relevance of data used in Al systems? Bias and Fairness Testing	
	What procedures are in place to mitigate the risk of AI bias, this may include bias audits, fairness assessment and actions taken to address issues?	



Areas to consider	Organisation's Response	
Are defined mechanisms in place for obtaining, recording and managing user consent for data usage in AI applications?		
Data Security Measures		
What data security measures are in place for AI data handling including security protocols, access controls and incident response plans?		

	Areas to consider	Organisation's Response
Al System Development & Deployment	Human Oversight Mechanisms What processes are in place for human oversight of AI systems e.g. documented human-in-the-loop processes, decision override capabilities, and monitoring procedures?	
	Lifecycle Management Are lifecycle management plans in place for all AI systems covering their development, deployment, maintenance and decommissioning?	
	Performance Monitoring What performance monitoring processes are in place for AI systems? Do these monitoring systems include metrics,	



Areas to consider	Organisation's Response
dashboards tracking AI system performance and accuracy over time?	
Transparency and Explainability	
What processes are in place to ensure the transparency and explainability of AI system processes and decision making e.g. user guides, model documentation and explanations provided to stakeholders?	
Procurement Due Diligence	
Is AI procurement managed in line with organisational procurement processes including evaluation criteria, supplier assessments and contractual terms?	

	Areas to consider	Organisation's Response
People, Skills & Culture	Staff Training and Awareness What training is in place for AI systems to ensure staff understand their AI-related responsibilities? How is training compliance monitored and reported?	
	Diversity and Inclusion What initiatives and metrics are in place to promote diverse perspectives in AI development and governance teams?	



Areas to consider	Organisation's Response
Stakeholder Engagement How are stakeholder (internal and external) engagement conducted, recorded and reported against for AI systems	
Change Management What plans and activities are in place for facilitating organisational adaption to AI integration, including communication and supporting structures?	

	Areas to consider	Organisation's Response
Legal & Ethical Considerations	Regulatory Compliance What processes are in place to ensure AI systems comply with relevant laws and regulations?	
	Ethical Impact Assessments What processes are in place to evaluate the potential ethical implications of AI applications, including considerations of societal impact and moral responsibility?	

