

AI regulation: a pro-innovation approach

CBI Consultation Response

Introduction

Across the UK, the CBI represents over 1,100 corporate members, who collectively employ over 2.3 million private sector workers, and nearly 150 trade association members who through their partnership, insights and evidence allows us to speak for 170,000 businesses of all sizes and sectors. With offices across the UK as well as representation in Washington, Brussels, Beijing and Delhi, the CBI communicates the British businesses voice around the world and welcomes the opportunity to respond to the *AI regulation: a pro-innovation approach* policy paper.

With the Prime Minister's 2023 pledge to grow the economy, the UK needs a laser focus on sustainable, high growth that leverages and builds UK strategic advantage. To achieve that high growth, innovative sectors like the UK's world-leading Artificial Intelligence (AI) research base¹ must be well equipped to boost productivity and address complex societal challenges like climate change. Smart regulation, that balances certainty with flexibility, is the key to unlocking the AI prize across the UK economy. The Government's intended approach as set out in the AI White Paper has been welcomed by businesses across the economy, as has the Prime Minister's recent recognition that "AI has an incredible potential to transform our lives for the better. But we need to make sure it is developed and used in a way that is safe and secure."

Government now needs to take the next step and turn principles into policy. Decisions taken now will have a lasting impact on AI innovation and diffusion in the UK and set the basis for further developments going forward. To help achieve this aim we have provided a range of focused recommendations and feedback on the AI White Paper. These are concentrated around the following themes:

- Ensuring the AI governance framework has the right form and functions
- The best principles and tools to embed responsible AI innovation
- Making the UK a global leader in AI

These recommendations are based on UK businesses' preference for clear, strategic, future-proof decisions and for a national regime which embeds innovation, proportionality, and coordination to maximise the opportunity of AI without compromising safety.

The views in this paper were gathered from ongoing engagement with CBI members, including our AI Working Group and affiliated Trade Association TechUK, as well as from more general business perspectives on effective approaches to technology regulation from our Tech Council, Innovation Council, and other individual member and expert conversations.

¹ Tortoise Media, The Global AI Index, 2023

The UK is at a pivotal moment and must seize the opportunity to make clear, strategic decisions about how AI will be governed

The nature of AI creates unique difficulties in its governance

Consultation Questions 7 and 8

Recommendation: no statutory duty on AI for individual regulators

As a general purpose and quickly evolving technology, AI has the potential to provide solutions to both specific societal challenges, such as reaching net zero, and UK economy wide problems, including boosting productivity. This flexibility is a strength but also creates unique difficulties for AI governance. UK business would favour a non-statutory approach as concrete regulations will quickly become out of date and are inappropriate for a sector-specific, outcome driven approach. A lack of shared core narrative for AI governance however risks creating misalignment between regulators and not addressing the problems with the current system.

While a shared core narrative on AI is important for regulator coordination, adding a statutory duty and legal obligation for individual regulators to have due regard to the AI principles would go too far and we **recommend a statutory duty is not implemented**. Regulators already have strong existing mandates within their respective sectors through which the new AI governance ecosystem will operate. Having a statutory mandate could even risk reducing much-needed regulator flexibility and agility if not allowed to change alongside the quickly evolving technology of AI. The better way to effectively implement these principles is through a coordinating body, as set out in the White Paper.

An AI Governance Hub would strike the right balance between decentralisation and coordination

Consultation Questions 9-14

Recommendation: Government should strongly consider an 'AI Governance Hub' as a cross-regulatory body that becomes the first stop for AI issues, coordinates resources and feeds into policymakers across Whitehall

The complexity of the regulatory landscape can make it challenging for businesses of all sizes to understand the objectives of their regulator and how best to approach AI governance. It is vital that AI governance plans and objectives are well-communicated to regulators and integrated into their workplans. This will increase regulator ability to work with the businesses they regulate to minimise confusion and reduce the barriers to entry for new innovative businesses and products.

To avoid these shortcomings, the Government has set out its intention to provide a “central suite of functions” to coordinate, monitor and adapt the framework through mechanisms that will supplement and support the work of regulators without undermining their independence or duplicating existing activities. This is welcomed by businesses. However, the coordinating body which carries out these functions should not have enforcement powers or a formal statutory footing, so that it retains the benefits of flexible, agile, and decentralised regulation. The implementation of this coordinating body could take many forms, but **Government should strongly consider an 'AI Governance Hub' (AIGH)** which:

- **Forms a cross-regulatory body:** The AIGH would be a new body which operates between sectors and regulators rather than becoming its own regulator. Existing cross-regulatory bodies include the Digital Regulation Cooperation Forum (DRCF) and the Multi-

Agency Advisory Service (MAAS) which coordinates regulation on AI and digital technologies within the NHS. Both are cross regulatory bodies that bring together regulators, such as the Competition and Markets Authority or Care Quality Commission, to coordinate activity, share skills and expertise and create shared resource for regulators with significant, specifically relevant interests. The AIGH should work with both the DRCF and MAAS to coordinate workstreams but not replicate their form as both have limited membership, who independently decide to join, which risks leaving gaps. The AIGH will need to consider the best way to involve and generate buy-in from the broad array of regulators involved in AI governance. It should also set clear boundaries to avoid duplicating workstreams such as AI ethics, AI research, and broader digital regulation coordination, which are covered by other bodies such as the Centre for Data Ethics and Innovation, Ada Lovelace Institute, and the Alan Turing Institute.

- **Becomes the first stop for AI issues:** Reducing compliance issues requires a clear first stop for businesses when they begin to face difficulties or assess trade-offs between regulatory objectives. To fulfil this role, the AIGH should provide a roadmap to help firms navigate the AI governance landscape, alongside a set of central resources including guidance and examples of best practice. These resources should also help regulators implement the new AI governance regime including the cross-sectoral principles, particularly those regulators with less mature AI workstreams. These resources should also be made available to businesses and individuals to create the 'one-stop shop' for AI governance. The National Cyber Security Centre could act as a model for business support, engagement and outreach.
- **Coordinates resources:** Considering the rapid rate of innovation in AI and related digital technologies, it's important for regulators to have sufficient resource, skills and expertise to effectively manage changing portfolios, and understand emerging business models and the changing technology itself. This includes resource to build in-house expertise, as well as resource to think innovatively in their approach towards AI regulation and guidance. Regulators are currently at different stages in this journey, with some more advanced such as the CMA's Data, Technology and Analytics Unit (DaTA). The AIGH should undertake work to understand the scale of resource and new skills requirements needed and lead a coordinated programme, which may include supporting a network of roaming AI experts that can advise regulators or bringing in the private sector to provide 'teach ins' on technological developments and new business models. These experts should be drawn from across the AI ecosystem and involved in developing guidance, horizon scanning and gap/overlap identification.
- **Feeds into relevant policy makers across Whitehall:** The AIGH needs mechanisms to support prioritisation across central government and at sectoral levels. It should advise on appropriate funding levels for regulators to fulfil duties as well as raise awareness of the UK's new AI governance regime across the economy. Government should consider positioning the AIGH within the CBI's proposed Office for Future Regulation² (OFR) The Office for Future Regulation would be an Executive Agency within the Cabinet Office and be best placed to govern AI from a 'whole systems' approach that enables regulation that supports growth and innovation and creates the necessary cut through. It would offer a base for regulators, industry, academics, and consumers to come together to develop AI governance systems and coordinate their roll out, creating a feedback loop to support the development of innovation-boosting regulation. Placing the AIGH within the recently

² CBI, The Office for Future Regulation, 2022

created AI Taskforce³ would be another option however the Taskforce's remit may be too narrowly focused on foundation models. Placing the AIGH within an existing regulator would risk making them the de facto AI regulator while a floating agreement between regulators, as with the DRCF, or within an independent body, such as the Alan Turing Institute, would not create sufficient government oversight and coordination. For the UK to achieve its ambitions to leverage AI for strategic advantage and economic growth – getting governance right must be prioritised at senior levels across government. The AIGH sitting within the OFR/Cabinet Office would ensure AI governance is prioritised and coordinated across departments and regulators.

Central guidance and engagement forums create certainty for regulators and businesses

Consultation Questions 15-18, L1 and F1

Recommendation: Central resources on AI regulation and governance should be provided to regulators on definitions, risk frameworks, liability, and for effective business engagement

Outside of the form of the new body, the Government also intends for it to carry out specific functions including: monitoring and evaluation, assessing and monitoring cross-economy risks, horizon scanning, supporting AI innovators, and promoting international alignment. Businesses support these functions being carried out centrally. However, given that most AI governance implementation will remain with sector regulators, clear boundaries will need to be delineated to prevent regulatory overlap. **Certain additional central functions should be provided to support sector regulators to carry out their own implementation including:**

- **Providing definitions:** Defining AI can be particularly difficult and inadvertently include a broader range of technologies than desired. To this point we welcome the 'core characteristics' approach which will let individual regulators set out more detailed definitions as applicable.
- **Developing risk frameworks:** In support of proportionate regulation, it is appropriate that sectoral regulators of AI treat high risk and low risk applications of AI differently. The AIGH could create coordinated guidelines for how regulators can determine and govern risk that supports a joined-up approach across sectoral and horizontal regulators, and whether regulatory oversight is necessary. The AIGH could work with regulators to issue additional guidance as necessary. The AIGH would not carry out assessments of what is high or low risk and use of the frameworks would be voluntary. To reduce business burden and support cooperation this framework should align with international efforts such as the National Institute of Standards and Technology AI Risk Management Framework⁴ in the US.
- **Issue guidance on liability:** AI development goes through multiple development stages, is reliant on vast high quality data sets and can be utilised differently by different stakeholders. This can quickly complicate issues around liability which may not solely rest with the developer. Consumers however often only interact with AI at the end of cycle with little awareness of where liability should sit. Issuing liability guidance would help embed the principle of clear responsibility while also increasing certainty for developers and users of AI that do not want to inadvertently be held liable. Initially this should focus on clarifying

³ UK Government, Initial £100 million for expert taskforce to help UK build and adopt next generation of safe AI, 2023

⁴ National Institute of Standards and Technology, AI Risk Management Framework, 2023

generative AI liability as set out in Sir Patrick Vallance's *Pro-Innovation Regulation of Technologies Review* but look to expand across the whole ecosystem.

Note: The CBI welcomes and supports the more detailed responses to questions L1-3 found in our affiliated Trade Association TechUK's submission to this consultation.

In order to more directly measure the impact of the framework, regulators and government should seek to increase the level of structured and direct engagement with business and civil society by **creating a business engagement forum**. The nature of AI and difficulty of implementing governance processes suggest teething issues are likely to occur. Business engagement creates a direct link between those making the regulations and those that are applying them, and ultimately helps deliver better compliance outcomes. Engagement across the development, implementation and evaluation cycle would lessen these issues. Routes to more direct engagement could include a business forum operated by the AIGH. The forum should build on the example of other regulators like the Financial Reporting Council's extensive business engagement⁵ and would act as a focal point to discuss cross-cutting issues with multiple regulators and to voice concerns that otherwise lack an obvious relevant regulator. This approach would unite relevant stakeholders to improve coordination while enabling industry leaders to address challenges of implementation.

⁵ Financial Reporting Council, Financial Reporting Council: 3 Year Plan, 2023

A successful UK AI governance regime will need to blend principles and sector specific guidance

Robustly implemented cross-sectoral principles can address concerns associated with having no horizontal regulator

Consultation Questions 1-6

Recommendation: A growth-related principle should be added to reflect the overarching aims of the Government

Recommendation: Regulators must issue clear guidance on how the AI governance principles will be interpreted, and the effectiveness of their implementation monitored and evaluated

Without a horizontal regulator the most appropriate way to guide work in different sectors towards similar aims is through cross-sectoral principles. The White Paper's principles are:

- 1) Safety, security and robustness,
- 2) Appropriate transparency and explainability
- 3) Fairness
- 4) Accountability and governance
- 5) Contestability and redress.

Firms welcome these cross-sectoral principles which will be crucial to addressing the risks posed by AI technologies however a balanced and considered approach to their implementation will be required. Principles should not contradict the overall intention of the AI governance system. Transparency is an obvious case where this could occur. Setting top-down requirements such as mandatory notification of when AI is used goes against a light-touch, context-specific outcome-driven approach and risks eliminating the benefits of the UK's flexible approach. Even the EU's more rigid AI Act looks set to create exemptions for certain uses like research activities⁶. The UK's approach should instead realise the benefits of its flexible approach by resisting overarching requirements. A superior approach and way to reduce contradictions is to **set requirements for regulators to issue clear guidance on principles**. Requiring that citizens and businesses have clarity in how these principles apply to them would empower existing regulators to improve systems like routes to redress.

Whilst firms welcome these principles and support their alignment with the OECD value-based principles⁷, there is notably no principle recognising the potential for AI to boost innovation and create sustainable growth in our economy. **A growth-related principle should be added to reflect the overarching aims of the Government** – including leveraging AI as a priority focus for the Department for Science, Innovation and Technology, and the UK AI Strategy. The OECD principle of Inclusive Growth, Sustainable Development and Well-being could be used as a guide. The current absence risks overlooking the potential for AI to address complex societal challenges and support growth in the UK, leading to an unbalanced regulatory approach to guidance and enforcement. Inclusion would thus recognise the risk of not using AI to address UK challenges and provide a framework for more balanced outcomes.

⁶ European Parliament, AI Act: a step closer to the first rules on Artificial Intelligence, 2023

⁷ OECD, OECD AI Principles Overview, 2019

Specific language within these cross-sectoral principles should also be carefully considered. Businesses support Government's proposal which notes that these principles are not intended to create an extensive new framework of rights for individuals, however the Government's principles include wording that has contextual legal grounding, for example 'fairness' as a legal concept when applied to personal data. It will be necessary to **monitor principles and issue guidance where conflicts arise**. This should be a part of ongoing efforts to develop an outcomes monitoring framework for digital regulation⁸. The same principle can also mean different things to different audiences, for example, the general public and AI specialists will have different standards for what is explainable. Principles need to be flexible enough to reflect these possibilities.

Well-resourced regulators are essential for the AI governance framework's success

Consultation Questions 19 and 20

Recommendation: Government must ensure regulators are both well-resourced and co-ordinated across a range of sectors and industries

One of the biggest challenges in the governance of AI will be ensuring that the appropriate skillsets are available to sectoral bodies. There are longstanding concerns associated with regulator capacity, which has a significant impact on the speed of approval processes and limits the ability of businesses to rollout innovative products at pace. When applied specifically to AI and its high pace of development, there is a real danger that an inadequately resourced regulator will be unable to keep pace with advances in technology.

It is vital for regulators to create the right frameworks where there is good trust and access across different industry sectors. Businesses welcome the sector approach to regulation, based on the different use-cases of AI as opposed to regulating AI in its entirety, however **Government must ensure regulators are both well-resourced and co-ordinated across a range of industries**. A pooled team of AI experts within the AIGH would be valuable but must not come at the expense of sector-specific expertise. The AIGH can coordinate and facilitate the upskilling of regulators, but some areas of AI adoption will require specialised knowledge to adequately understand and appreciate the opportunities and risks associated with each sector. Likewise, our proposed business engagement forum should be used to help inform the type of outreach required by industry. One suggestion would be for regulators to convene businesses together in a series of 'discovery workshops'. These could initially cover the AI regulation process but in time extend to showcasing the capabilities of AI and best practice of using AI to help increase AI adoption. Overall, it remains key for regulators to be responsive and well-resourced to respond to a cross-sectoral, quickly evolving technology without an overly burdensome regime which stifles innovation.

Standards, sandboxes and assurance should all be part of the regulatory toolset

Consultation Questions 21 and S1

Recommendation: The AI Standards Hub standards should not be made mandatory

Recommendation: AI regulatory sandboxes are likely to be useful at an individual sector multi-regulator level, but there should be a target for a multi-sector multi-regulator sandbox, coordinated by an Office of Future Regulation

⁸ DCMS, Plan for Digital Regulation: Developing an Outcomes Monitoring Framework, June 2022

Voluntary industry-driven technical standards provide a non-regulatory pathway to give firms clarity, certainty, and consistency in using and developing AI. Standards establish best practice and support harmonisation. Standards also avoid burdensome regulatory approval processes and can be globally orientated to avert the need for complicated adequacy systems, as currently occurs within data protection. The development of the infrastructure to support AI standards, including the UK Government supported AI Standards Hub, is well underway and will be a critical resource to coordinate UK involvement in standards-setting as they are developed, as well as business use of international standards. Many standards are still under development and the standards available will take time to mature. Accordingly, **while standards are beneficial it would be inappropriate for them to be made mandatory** which could freeze development and reduce the flexibility advantage that standards provide. This will also require maintaining a separation between the AI governance framework and AI Standards Hub.

Another tool that should be used to deliver trustworthy AI will be the regulatory sandbox. The Vallance Review set out several recommendations including the development of a multi-regulator sandbox for AI within the next six months. The Government's acceptance of these recommendations is welcome as is the focus on engaging with businesses in the design and delivery of the sandbox. A regulatory sandbox can be a great way to overcome the regulatory challenges faced by emerging technologies without reducing safety standards and has seen success in other sectors including fintech. **We advocate that the work of the regulatory sandbox be centrally coordinated through the OFR and seek to learn from the experiences of other sandboxes.** This should include ensuring that there is the right participation in the sandbox, taking a proactive approach to communicating relevant regulations and creating a mechanism to share learnings and best practice from the process. While the indicated preference is for this sandbox to initially focus on a single sector and multiple regulator approach, we would caution that the cross-sectoral nature of AI may make separating out a single sector difficult and would suggest that **the eventual goal should be a multi-sector multi-regulator solution.**

Note: The CBI welcomes and supports the more detailed responses to questions F1-4 and S1-4 found in our affiliated Trade Association TechUK's submission to this consultation.

Development of AI standards and sandboxes should continue to include the wider AI assurance ecosystem. AI assurance services are the tools, services and professionals needed to build a trustworthy AI ecosystem such as auditing and certification. Establishing this ecosystem is critical to build trust amongst the consumers, businesses, and wider public who will be adopting AI in the coming years. Different branches of the assurance ecosystem will manage aspects of AI risks not fully covered by standards or the AIGH including developing an AI assurance market. This will build on the strengths of the UK's existing professional and technology sectors and play an important role in avoiding hard line, statutory regulation. The Centre for Data Ethics and Innovation's *Roadmap to an effective AI assurance ecosystem*⁹ has set out a strong path forward with notable progress across its strands of work. **As it continues to propel the UK towards more developed AI assurance, CDEI must double down on industry engagement.** Input from firms will be vital to make sure the UK not only has the most trustworthy ecosystem but also becomes the best regime to develop and adopt AI in.

⁹ CDEI, The roadmap to an effective AI assurance ecosystem, December 2021

Becoming a global leader in AI requires international coordination and engagement

AI governance regimes are in development in jurisdictions across the world

Recommendation: the UK should consider very carefully the best way to engage in regulatory collaboration with leading partners like the EU and US, as well as multilaterally

The rapid evolution of AI technologies is leading to new legislation and governance mechanisms to regulate it globally. For the UK, it is clear that regulatory governance collaboration, and potentially differentiation - will be required, in particular with the regulatory regimes of the EU and those in North America.

The EU's primary mechanism for advancing AI regulation is its AI Act.¹⁰ In it, the EU proposes horizontal rules for AI founded on a risk-based approach, seeking to ensure its consistency with stated EU fundamental values and rights. As part of that, a European Artificial Intelligence Board - with EU countries and European Commission representatives - will oversee the consistent implementation of the new rules with the support of national authorities designated by Member States. In addition, the EU-US Trade and Technology Council (TTC) is working to implement a Joint TTC Roadmap on AI. This provides an early step to a shared approach for a trustworthy AI including tools, methodologies, taxonomy and AI risk management. This horizontal approach will impose strict non-risk based rules in contrast to the UK approach. However, **the UK should consider the best way to engage with leading partners like the EU and US.**

The United States is developing a 'hub and spoke' or 'use case' approach to regulating AI deployment at the federal level. Congressional leaders are largely skeptical of creating an entirely new federal agency that creates an approval process and clearing house for new AI algorithms (as the Food and Drug Administration requires for new drugs), out of concern that it would kill innovation from small players and take regulatory power away from existing agencies who are experts in their craft. Key US regulatory bodies, therefore, have been active in defining existing statutory authority over AI. In April 2023 the Department of Justice (DOJ), Federal Trade Commission (FTC), the Consumer Financial Protection Bureau (CFPB), and the Equal Employment Opportunity Commission (EEOC) released a joint statement outlining their own authorities to regulate new AI tech: the FTC and CFPB argued that they would be well positioned to address unfair AI business practices that target or abuse consumers while the DOJ and EEOC argued that their authority covered situations of discrimination and unfair bias. This multi-regulator approach and joint working is similar to the approach of the DRCF however without a more substantive coordinating function could see greater divergences between regulators than in the UK.

Canadian officials on the other hand have favored a statutory approach that empowers regulators with wide flexibility on AI governance – a halfway house approach between the US and EU. The Artificial Intelligence and Data Act (AIDA), introduced in March 2023, would impose broad accountability, transparency, and compliance requirements for any entity developing, designing, or deploying 'high impact' AI systems that could cause harm in Canada. However, the definition of high impact is purposefully left unclear in the bill text, which would give regulators the power to set

¹⁰ Proposal for a Regulation of the European Parliament and of The Council laying down harmonised rules on artificial intelligence (Artificial Intelligence Act) and amending certain Union legislative acts.

specifics and definitions on an as-needed basis and stay aligned with key allies like the US. Canada's federal system, which grants provinces their own statutory regulatory powers, is a major reason why AIDA favors a large prescriptive statutory approach rather than a guidance-first approach however this could risk aspects of AI governance falling through regulatory gaps.

At the multilateral level, the G7 has recently launched the Hiroshima Process to develop a collective approach to AI, tasking relevant ministers to form a working group by the end of the year. In coordination with the OECD and the Global Partnership on AI, the Hiroshima Process will serve to discuss a common AI governance, generative AI as well as transparency, intellectual property, disinformation, and the use of such technologies. Business welcomes the UK Government's commitment to engage with like-minded partners for global AI rules and governance and recognises the key role of G7 in this context. Along with its B7 partners, the CBI believes that **multilateral coordination through the G7 – making national policies interoperable and setting international standards - will unlock further opportunities on AI.**

Becoming a global leader in AI regulation will require taking the lead on international AI governance – and taking the best from a deep knowledge of others' approaches

Recommendation: The UK must be prepared to update its framework and regulator mandates to prevent new AI developments and international governance changes from neutralizing its approach

Recommendation: The UK should also recognise its own potential to influence AI regulation in third party jurisdictions

Recommendation: The UK should keep pushing the AI debate in some of the key fora, including through the Autumn 2023 AI Summit

In this context, the UK must act quickly to consider international changes and provide credible solutions for business and consumers to seize the potential of AI. Compared to the EU's AI Act, industry across the UK considers Government's intended agile approach more desirable however risks remain. Conflicting regulations and excessive burdens for companies may hinder their exports of AI-related products in other markets, raise the cost to access AI goods as well as endanger the role of the UK as an innovative place to invest. **The UK should be prepared to update its framework and regulator mandates to prevent new AI developments and international governance changes from neutralizing its approach.** Consistent engagement with the business community will be a cornerstone of this approach or risks reducing clarity over obligations and liability to innovators as businesses in Canada are currently experiencing over AIDA.

The UK should also recognise its own potential to influence AI regulation in third party jurisdictions, such as at the state and local level in the United States. California's Age-Appropriate Design Code Act, for example, has already been heavily influenced by the UK's Age-Appropriate Design Code. As the UK heightens its economic engagement inside US state capitols, it should make AI governance a pillar of these discussions. Seven US states in 2023 alone have introduced and/or enacted legislation regulating AI's usage - such as preventing employers from secretly using automatic hiring programs or allowing residents to opt out online profiling mechanisms that feed large algorithms. In the absence of a federal data privacy framework in the US, state governments will continue to have a global impact on AI governance standards.

To aid the process of making the UK's AI governance system compatible with others and boost UK influence at the international stage, the **Government should keep pushing the AI debate in some of the key fora**. Business recognises that the UK is part already of strategic international settings such as the G7, the Global Partnership on AI, the OECD AI Governance Party, the Council of Europe Committee on AI among others. In addition to the international engagement, the UK should be able to demonstrate effective implementation of national AI rules and strong coordination among regulators in a way that these can be taken as examples abroad. Sharing successful best practices is key to develop a global AI ecosystem with the UK at its centre and industry is a pivotal part of the process, as it gives the practical feedback to advance towards a shared and functioning AI governance. The AI summit – announced by the Government for the Autumn¹¹ - will be a further occasion for the UK to lead the change in the AI approach worldwide.

Conclusion

At this stage, the UK is well positioned to become a world leader in AI technologies, shape the discussion on the future of AI governance. The AI White Paper is a strong starting point which has been welcomed by business as it sets out mostly the right principles, characteristics, and mechanisms through which this can be achieved. Going one step further and becoming the global leader in AI and the best place to develop AI business models will necessitate getting the implementation right. It will require:

- An agile coordinating body which provides the right central functions
- Carefully selecting the right principles, characteristics and tools to promote innovation and safety
- Regulators with the right skills, expertise and resources
- The UK deploying its expertise to influence international trends on AI regulation and interoperability
- That the Government recognises that these must come alongside wider efforts including the G7 Hiroshima process and this Autumn's planned 'AI Safety Conference'
- The swift and effective implementation of the AI White Paper

If the UK can succeed on all of these it will be fast tracking the National AI Strategy's aim to *ensure the UK gets the national and international governance of AI technologies right to encourage innovation, investment, and protect the public and our fundamental value*.

¹¹ UK Government, UK to host first global summit on Artificial Intelligence, 2023