# ForHumanity AI Literacy Guidance

- This Presentation is prepared for **Learning and Development professionals** who want to deliver AI Literacy training that is compliant with Article 4 of the EU AI Act
- Included in this resource are learning objectives (LO) that are tailored to requirements of the law designed to differentiate amongst learners (hereafter called "Personas"), such as considerations of roles, responsibilities, and technical expertise.
- Using this resource requires the Learning and Development professional to:
  - Understand the LOs
  - Understand the applicable AI System in partnership with AI Leaders
  - Apply use case specific details to the curriculum

# Distinction between AI and AAA Systems

- AI, Algorithmic, and Autonomous (AAA) Systems

| Algorithm | a process or set of rules to be followed in calculations or other problem-solving operations, especially by a computer |
|---|---|
| Artificial Intelligence | a digital tool that is designed to replace or assist human decision-making |
| Autonomous System | Any self-governing system, operating without a human-in-the-loop (excluding pre-start inputs and design plus maintenance, recalibration, retasking and repair) , producing characteristics of human dexterity, such as arm or leg motion and their results (e.g., travelling distances) or any one of the five human senses |

# AI Literacy

*Providers and deployers of AI systems shall take measures to ensure, to their best extent, a sufficient level of AI literacy of their staff and other persons dealing with the operation and use of AI systems on their behalf, taking into account their technical knowledge, experience, education and training and the context the AI systems are to be used in, and considering the persons or groups of persons on whom the AI systems are to be used* - SOURCE: EU AI Act Article 4



FORHUMANITY

# 1. Introduction to the Learning Objectives

# ForHumanity Identified Personas

A person's applicable persona is determined by the nature of their interaction with the AAA System (regardless of their awareness)

Personas need not be mutually exclusive

- Persona 1 = Users impacted (non-employees) *Recital 20 EU AI Act
- Persona 2 = Employees impacted by the AAA System
- Persona 3 = Employees* contributing to the proper function of the AAA System (excluding Pipeline inputs)
- Persona 4 = Top Management and Oversight Bodies
- Persona 5 = AAA System Leaders, decision-makers for the AAA System

*Employees = employees, contractors, gig-workers, or associated Service Providers

For more information - Terms and Definitions

# ForHumanity AI Literacy Considerations

1) Which of the ForHumanity Personas am I responsible for in my own organisation?

2) Am I responsible for providing or assisting with AI Literacy compliance for my customer/client?

3) Might the customer/client want associated upskilling in order to meet AI Literacy duties of their own?  (e.g., security/cybersecurity, industry/sector-specific training, product/interface-specific training)
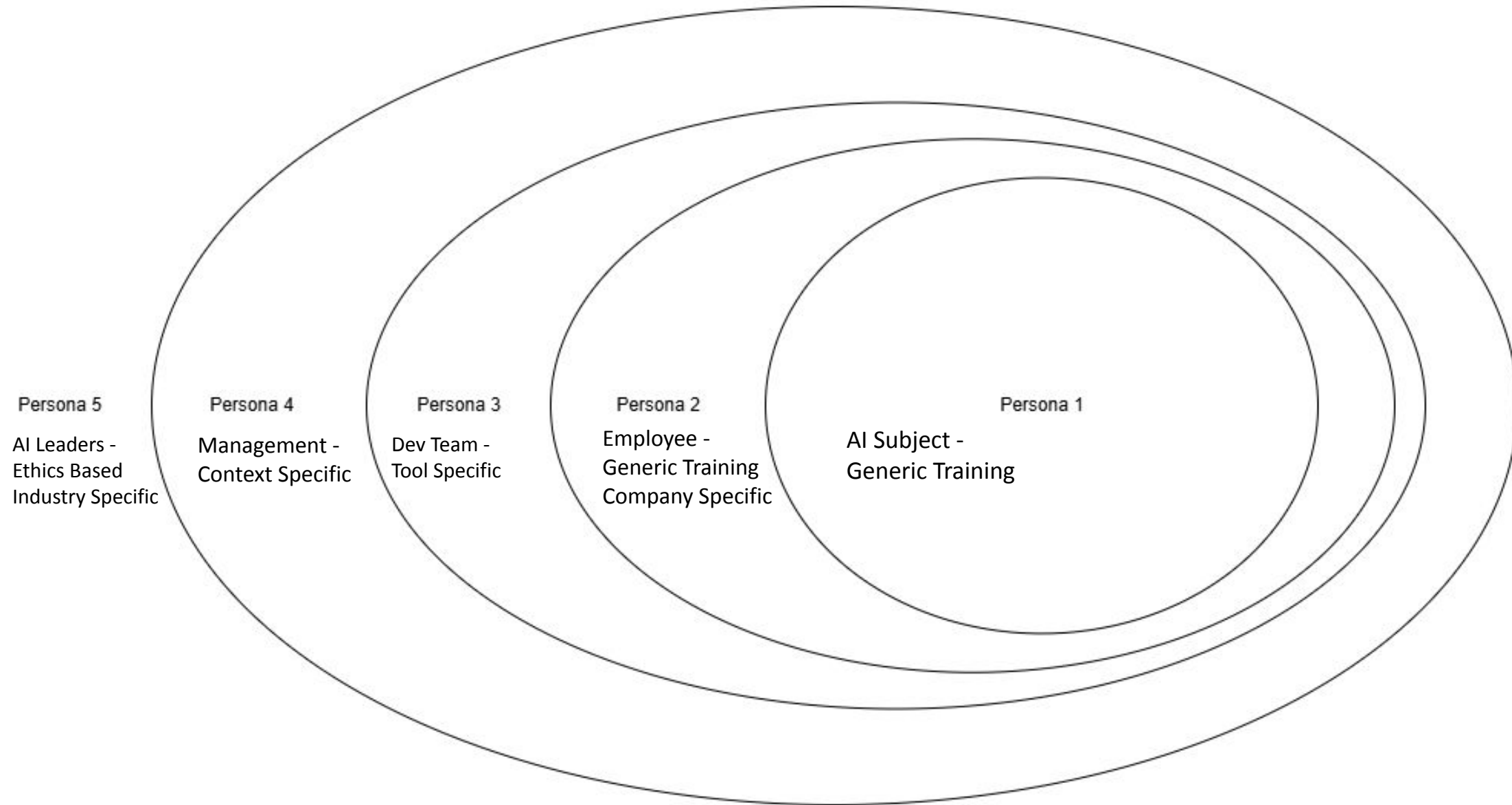
# Personas

# Achieving Learning Comprehension

- Terms and Definitions related to AAA Systems may not have achieved comprehensive and complete industry or societal adoption and acceptance - use defined terms to facilitate comprehension and understanding
- Define abbreviations and acronyms
- Frequency of training ought to be established to "ensure sufficiency" in AI Literacy - no less than annually
- Establish the nature of the learners and the applicable Personas to be educated, including roles and responsibilities

# Levels of AI Literacy



Persona 5

AI Leaders -
Ethics Based
Industry Specific

Persona 4

Management -
Context Specific

Persona 3

Dev Team -
Tool Specific

Persona 2

Employee -
Generic Training
Company Specific

Persona 1

AI Subject -
Generic Training

# Specialty Committees

- The specific and unique risks associated with Protected Categories, Intersectionalities, and Vulnerable Populations are mitigated by specialty committees, but they are not applied to these learning objectives
- Learning management coordinators should take care to ensure that the applications of the work herein are considerate of the specific and unique risks, such as ensuring that the content is Age-Appropriate and Child-Friendly if being delivered to Children)
- Accessibility and Inclusion principles should guide the production of this material, including a variety of modalities

# Persona 1

# Recommendation on how to train on learning objectives to Persona 1

Generic AAA Systems -

- Approximately 5 minutes, but can be based upon value
- Define AI as follows - "a digital tool that is designed to replace or assist human decision-making"
- Discuss the benefits of using/interacting with AAA Systems
- Discuss the risks of using/interacting with AAA Systems (e.g., Privacy)
- Provide users/AI subjects with the ability to learn more or find additional resources

AAA System specific -

- Just-in-time Notification requiring completion and acknowledge understanding for advancement of use of the tool (may be required one time only if appropriate)
- Provide context of the AI system the user/AI subject is about to use
- How to use the tool

# Persona 1 - Learning Objectives

The learner -

- Should be able to define AI
- State the primary function(s) of the tool
- Describe how their actions affect the output of the AI tool
- Give examples of what can go wrong when using the tool
- Describe the process for reporting concerns about the tool and for seeking help, and opt-out of tool usage if applicable

## AI Literacy Trainer Objective

After the training the learner will feel empowered to decide whether or not to use the tool.

# Metrics of Successful AI Literacy Training - Persona 1

- Track completion of the training
- Feedback loop for complaints
- Ability to learn more

# Persona 2

# Persona 2 - Training Overview

- General AI Safety Knowledge - Recommended minimum of 15 minutes
- Corporate Governance and Organisational Policies
- Approved Tool Training for individual productivity and information
- Employees as Impacted Stakeholders and not their role and/or responsibility in regards to operating the AAA System
- Acceptable Use policies

# Persona 2 - General AI Safety Knowledge

- Define AI as follows - "*a digital tool that is designed to replace or assist human decision-making*"
- Should be able to identify and define key AAA terms
- Should be able to describe general benefits of AAA Systems, including giving some examples
- Should be able to identify general harms and risks often associated with AAA Systems (with connected linkage for extra learning on controls, treatments, and mitigation)- see Appendix A

# Persona 2 - Corporate Governance and Organisational Policies

Recommended Learning Objectives for All Staff

- Awareness of Internal AI Governance (Organisational Policies)
  - Should be able to identify approved AAA tool(s) and have a general understanding of the benefit and risks associated with using the specific tool
  - Know how and where to access the policy(ies)
  - Describe the process for employees to engage with AAA Systems (e.g., an approved AAA Policy, Workforce AAA Policy, or GenAI Policy) including, how to request use of a tool
  - Articulate the process for approval/acceptance of tool usage
    - Find the list of approved AI tools
    - Know whether any AIs are banned
  - Find the process/procedure to raise questions, concerns, critiques about an AAA System
  - Articulate how to report any concerns about the technology (and for seeking help)

# Persona 2 - Approved Tool Training for Employee Use

Recommended Learning Objectives for All Staff

- Distinguishing between job duties, responsibilities, and required AAA System usage (Persona 3) and optional tool usage
- Training for the impacted employee on how to input data properly into the tool
- Awareness of Internal AI Governance (Organisational Policies)
  - Be able to describe how to access the tool and what the benefits and uses of the tool may be
  - Be able to articulate what are the risks or harms that can occur when using the tool or when a tool is present
  - Be able to articulate what the policy is regarding the user's responsibilities for privacy and security (if applicable).

*Note - Required use of approved tools and associated training on usage for business purposes in accordance with the learners role and responsibility is covered in Persona 3*

# Persona 2 - Employees as Impacted Stakeholders

Training and education based on the use of technology in the organisation

- Safety-orientation - tool and context specific
- Employee impacts from AI
- Awareness of corporate AI usage and rationale
- Employee-centric

Train employees on the following details:

- Identify the purpose, applicability and consequences of the tool to the employee (Scope, Nature, Context, and Purpose of the AI System)
- Identify, differentiate and match Risks and Benefits to:
  - The Organisation
  - The Employee
- Identify the AAA System as high-risk or not (mostly based on employment)
- Can they identify how to opt-out, if applicable
- Their rights associated with the AAA System, including data privacy and protection, and how to access and execute those rights
- Where to find links to impact assessment and further information such as Terms and Conditions, Privacy policy, and Acceptable Use

# Metrics of Successful AI Literacy Training - Persona 2
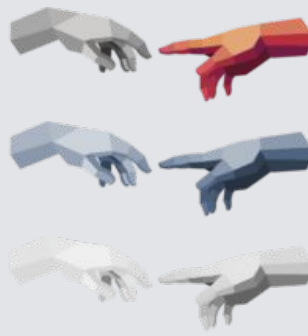
- Feedback loop for complaints
- Annual review of the learning objectives, at least
- For most AAA Systems - minimum completion-only, without the need for testing competency and recommend knowledge checks to affirm comprehension
- For high-risk AAA Systems and AAA System organisational governance,
  - Knowledge checks and education on correct answers - with a final required minimum standard
- Provide the possibility for further learning (applicable general Persona 3 access)
- Tracking further training accessed

# Persona 3

# ForHumanity AI Literacy Guidance - The AI Literacy Smorgasboard

- For each of the 16 pillars, a comprehensive list of learning objectives (LO) are presented here.
- This approach is designed to enable and empower the learning manager to have access to most of the essential information covering all of their learners (in this single resource)
- Learning managers should identify LO for each learning according to their role and responsibility
- No single learner will require all LOs from each of the 16 pillars

# Personas (3-5) - 16 Operational Pillars
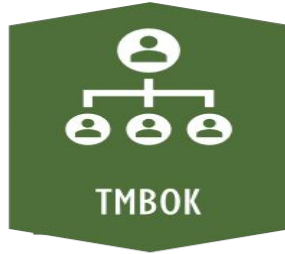
# Persona 3 - ForHumanity AI Literacy Guidance

The **Training and Education Lead** shall work with each applicable Persona 5 person or group listed below to identify the applicable Learning Objectives for each of the CORE pillars

1. Algorithmic Risk Committee,
2. Ethics Committee
3. Data Lead
4. Test Lead
5. AAA Cybersecurity Lead
6. Monitoring Lead
7. Quality Management Lead
8. AI Compliance Lead

1. To determine the scope, nature, context of the learning objectives
2. To assign learning objectives to specific persons based up their roles and responsibilities
3. Method for learning and development
4. Persona 2 training is a prerequisite for Persona 3-5 learners

# How to train on learning objectives to Persona 3

- Notification of requirement
- Recommended - knowledge assessment with a minimum passing score and no less than knowledge checks with learning based upon incorrect answers with immediate remediation
- No less than annual review of learning objectives, unless mandated by Relevant Legal Frameworks
- Alignment to the organisation's Code of Ethics and any applicable profession ethics

# Persona 3 – How to compile the training

1. In Context - What does the learner need to know?
   a. Job Description
   b. Expertise (subject matter expert)
   c. Existing Technical Knowledge

2. Tool specific training - What does the AAA System do?
   a. Its Purpose(s), capabilities, and integration to corporate processes
   b. Who is using/impacted by the AAA System
   c. How does the learner's role facilitate achievement of the system's Purpose and organisation's objectives using the tool
   d. How are we allowed to use it?
      i. Based on roles and responsibilities and training
   e. What are we prohibited from doing?

# Persona 3 - How to compile the Training (cont)

3.  **According to roles and responsibilities -**
    a.  **What is my role/duty? where do my responsibilities begin and end**
    b.  **Other stakeholders and associated boundary conditions**
    c.  **How to use the AAA System?**
    d.  **Nature of the UX/UI between the User and the AAA System**
    e.  **Goals and sufficiency of task completion**
4.  **Associated with usage, interaction, or support of the AAA System and associated ecosystem**
    a.  **Human interactions**
        i.   **Roles and/or responsibilities**
        ii.  **Process and/or procedures for proper interaction**
        iii. **Error remediations processes and procedures**
    b.  **Standard reporting functions on normal operations**

# Persona 3 - In Context - Tool Specific Training

1. Relevant Legal Frameworks, based upon Jurisdictions applicable to the learner(s)
   a. State what the legal obligations are for the AAA System
   b. When legal obligations are enforceable?
   c. Aware of additional resources that describe applicable laws and how to access those resources
2. Be able to understand the scope of their duties and responsibilities and the segregation of duties amongst team members.
   a. Know the tasks they can and should do
   b. Know the tasks they should NOT do
3. Be aware of continuous learning resources from amongst the 16 operational pillars and be able to find them
4. Be able to state the phases of the organisation's Algorithmic Lifecycle and be able to differentiate between one phase and another
5. Be aware of general brand awareness, business positioning/rationale and the context of the AAA System deployment

# Persona 3 - Ethical Oversight

- Be able to find the Code of Ethics and the Code of Data Ethics
- Be able to identify key organisational principles and explain them
- Be able to determine and identify instances of Ethical Choice
- Be able to determine when instances of Ethical Choice are to be referred to the Ethics Committee
- Be able to articulate what diversity means in the context of the organisation and how it is applied in the organisation
- Be able to identify key laws and regulations applicable to their roles and responsibilities
- Be able to identify stakeholders both direct and indirect
- Be able to identify examples of instances of Ethical Choice that can be made by the learner or when they should be referred to the Ethics Committee
- Be able to articulate the key elements of an FRIA
- Be able to describe and explain the process for assessing impacts to Fundamental Rights
- Be able to describe and identify Personal Data
- According to roles and responsibilities, be able to describe controls, treatments, and mitigations in regards to the FRIA
- Be able to describe tensions and trade-off, pros and cons in the context of studying Proportionality
- Be able to describe and implement the steps in an Ethical Risk Assessment
- Be aware that Ethical Oversight establishes ethical choice parameters for Content Moderation and Concept/Model/Data drift, human interactions/oversight
- Be able to describe ethical oversight in vendor management in regards to the Vendor org and the input, product or service

# Persona 3 - Risk Management

- Be able to identify, explain, and locate the organisation's Risk Management Policy for the AAA System
- Be able to determine the risk classification of the AAA System and whether it has systemic risk
- Be able to describe the organization's risk taxonomy and classifications
- Be able to describe the risk management process, including identification, analysis, evaluation, treatment, and risk management feedback loops
- Be able to identify, analyze and document known and reasonably foreseeable risks posed by high-risk AI systems to health, safety, or fundamental rights
- Be able to estimate the severity and likelihood of an identified risk input or indicator and recognize that risk assessor may have differing opinions on identified risk
- Be able to explain what Residual Risk is and any regulatory requirements for disclosure
- Be able to explain and describe appropriate risk controls, treatments, and mitigations to address identified risks and minimize residual risk
- Be able to conduct ongoing risk assessments based on feedback from post-market monitoring systems

# Persona 3 - Testing & Evaluation

- Be able to describe the key elements of testing and evaluation, including the Test Lead, Test Plan and Test Completion Report
- Be aware that the Algorithmic Risk Committee is accountable for T&E and assigns a Test Lead to oversee, who is a member of the ARC
- Be aware of the importance of independence (internal or external) for testing and evaluation, including understanding the segregation of duties between testers and designs/developers/ Data Science teams
- Be able to describe that T&E happens prior to deployment and prior to implementation of change management plans
- Be able to explain the testing and evaluation process, including:
  - Be able to describe the AAA System and the data (Personal or Non-Personal) that is included
  - The identification of use cases, foreseeable scenarios, key modalities, harmonization standards, and common specifications (if applicable)
  - Accessibility and usability testing
  - Functional correctness, robustness, reliability, controllability, and resilience, including Failure Mode and Effect Analysis
  - The scope, nature, context, and purpose of the Test Item (e.g., human interaction, monitoring)
  - Test Completion report, including metrics, measurements and thresholds for sufficiency
- Be able to locate the Test Plan, Test Completion Report, testing environments, tools, and resources
- Be able to describe the role of Diverse Inputs and Multi Stakeholder feedback in the testing process

# Persona 3 - Data Management & Governance

- Be able to describe the skills and expertise of a Data Lead
- Be able to describe the goals and critical elements of a Data Management and Governance Policy
- Be able to define Causal Hypothesis, Construct Validity
- Be able to describe Data Quality and Information Quality and explain the difference between them
- Be able describe the process and contents of a Necessity Assessment
- Be able to explain the Training, Testing, Validation split process and necessary characteristics
- Be able to explain metadata management, including syntax and semantics
- Be able to describe bias mitigation technique including three types of bias and the areas of the AAA System where assessments and mitigations may be implemented
- Be able to define Synthetic Data and its acceptable characteristics, including a process for inclusion in data sets
- Be able to describe the contents of a Data Protection Policy, Data Security Policy, and Security Policy
- Be able to describe and implement an Inclusivity Risk Assessment
- Be able to describe the contents of a Data Transparency Document
- Be able to describe techniques for curating the training, testing, validation datasets
- Be able to ensure that Source Data is relevant, representative, and balanced

# Persona 3 - Technical Documentation

- Can the learner explain why we have technical documentation requirements?
- Can the learner explain who is responsible for compiling technical documentation?
- Can the learner explain what the duties of the AI Compliance Lead include?
- Can the learner define the components of the technical documentation they are responsible for?
- Can they describe the source of the information that goes into their documentation?
  - **Data Curation Report - A summary report of the steps taken Data Management and Governance to clean and prepare data for training ([https://forhumanity.center/definition/](https://forhumanity.center/definition/)) ([https://forhumanity.center/bok/](https://forhumanity.center/bok/)datacurationreport.pdf)**

  **See Annex Technical Documentation for the detailed definition**

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# Persona 3 - Record Keeping

Record Keeping - Logs

In consideration of the:

1. **Scope, Nature, Context, and Purpose** of the high risk **AAA System**,
2. **Relevant Legal Frameworks**

the **Algorithmic Risk Committee** shall establish an applicable, appropriate, and industry-standard **Event Log(s)** to track and classify events, with **Traceability**, generated by **AAA System** including, but not limited to:

A. **Pipeline Data**
B. Risk Log (e.g., events/incident that can be linked to negative impacts or risks (as defined by Article 79.1 that might impact rights and freedoms of **AI Subject, Substantial Modification**)
C. **Adverse Incident Reporting System**
D. Human Interactions Log
E. Continuous and post-market monitoring
F. Security and Cybersecurity log
G. All individual technical infrastructure event logs, as applicable or necessary
H. External condition measurements, as applicable
I. Applicable information about the **Deployer** and/or impacted **AI Subject**

# Persona 3 - Transparency (contract)

**Contract - should understand:**

- Is the the purpose/scope understood; and are terms understood or extant, A-Z?
- Be able to articulate the expected usage of the AAA System by the deployer
- Be able to articulate and describe key terms for the contract
- What are the practical steps and who is involved in contracting
- Be able identify and provide examples of Personal Data
- Be able to describe communications and reporting between the Provider and Deployer
- Be able to describe the documentation exchange between Providers and Deployers
- Be able to articulate the roles and responsibilities of each party according to the contract, especially in regards to legal compliance
- Be able to describe available accommodations
- Be able to describe termination steps, if applicable

# Persona 3 - Transparency (Deployer and AI Subject Guide)

- Be able to describe installation instructions
- Be aware the provider of the AAA System and its scope, context and purpose
- Be aware of the potential residual risks
- Be aware that clear and plain language is the standard form of communication - approximately to the level of a 12-13 year old reader
- Be able to articulate how the system's capabilities impact protected categories, intersectionalities and vulnerable populations
- Be able to understand the expected output of the system, including warnings and disclosures on-screen
- Be able to understand relevant metrics, measurements, and thresholds that impact the user experience

# Persona 3 - Transparency (Deployer and AI Subject Guide)

- Be aware of impactful specifications and technical documentation and be able to locate the details
- Be able to describe standard operating parameters and key risk indicators
- Be able to articulate basic features of source data used and version/logs
- Be able to describe the contents of Data Transparency document and locate it
- Be aware that Accommodations are offered, locate the mechanism for requesting Accommodations
- Be aware of the role of monitoring to maintain model health and fitness
- Be aware of Deployer AI Literacy requirements
- Be able to articulate the role of humans in the the loop for the system
- Be able to understand how to interpret outputs

# Persona 3 - Human Oversight

1. Be able to articulate the goals of human oversight including mitigation of risks to health, safety, and fundamental rights.
2. Identify human oversight in the AAA System and examples of "why" human oversight is mandated, including examples of good oversight and unnecessary or even dangerous human oversight (see Appendix A - Human Oversight use cases)
3. Understand if the AAA System is high risk and the impact on human oversight.
4. Be able to articulate the responsibilities and potential actions allowing human oversight to to stop, pause, disregard, override, and/or reverse the AAA System
5. Be aware that human oversight is not a panacea, and the limitations of human oversight mechanisms, such as cognitive constraints, automation bias, and legal ambiguities
6. Be aware that human oversight requires training on the AAA System, roles and responsibilities, and mechanisms for control

# Persona 3 - Security and Cybersecurity

1. Be able to articulate the need for security and cybersecurity
2. Be aware of business continuity and disaster recovery plans and impacts to individuals
3. Be aware of Restoration Priority Plans and Contingency Plan and an individuals roles in executing the Plans
4. Be aware of Incident Response Policies, playbooks for minor incidents and Incident Response Plans for major incidents, including individual roles and responsibilities
5. Be aware of Acceptable use, Remote work, and Clear desk policies, including an individual's roles and responsibilities
6. Be aware of physical and logical identity and access management, including authentication and password usage
7. Be aware of increased vectors for cyberattacks associated with AAA Systems

# Persona 3 - Monitoring

- Be able to describe the processes and procedures that assures model health and fitness
- Be able to describe the process and procedure for tracking model, data, and concept drift, including the steps to take when guardrails are encountered
- Be able to access and describe the Adverse Incident Reporting System
- Be able to describe the metrics, measurements, and thresholds that differentiate between a minor incident and a major (or serious) incident
- Be able to describe how monitoring connects to:
  - risk management,
  - vendor management,
  - incident response,
  - quality management,
  - human oversight
  - Change Management
- Be able to describe how monitoring information needs to be routed to:
  - Ethics Committee
  - AAA Cybersecurity Lead
  - AI Compliance Lead
  - Data Protection Officer
- Duties of monitoring of Deployers and AI Subjects

# Persona 3 - Incident Response

- Be able to identify, explain, and locate the Incident Management Policy.
- Be able to identify and explain one's role in Incident Response Plans effectively, including processes, and desired outcomes during significant incidents.
- Be aware of the roles and responsibilities assigned to the learner for incident response, including adjacent roles and responsibilities and where/how to seek help or guidance.
- Be able to apply the actions required to preserve evidence and to aid legal processes and/or procedures in the event of an incident, including robust documentation of incident response activities.
- Be aware of how Incident Management connects and overlaps with other policies, including Monitoring, Algorithmic Risk Assessment, Cybersecurity Risk Assessment, and Adverse Incident Reporting Systems.
- Be aware that there is a process for incident classification (e.g., major and minor) and how to record incidents and how the learner will be notified that an incident response is required.
- Be aware of the limitations and challenges of incident management, including potential gaps in incident detection, automation biases, cognitive constraints, and legal ambiguities for post-incident analysis.
- Be able to explain the importance of effective communication to stakeholders and describe the necessary components of effective communication during an incident.
- Be able to describe activities associated with minor incident playbooks or handbooks according to the learner's roles and responsibilities.

# Persona 3 - Change Management

- Be aware that no change is to be implemented, regardless of size and impact, without going through the change management process
- Be able to describe the mechanisms that lead to change management including the understanding of when a Change Management Impact Assessment is required and what metrics, measurements and thresholds should be assessed
- Be able to describe the relationship between a Change Management Impact Assessment and a Change Management Plan
- According to their role, responsibility, and duties, be able to describe the procedures and processes that are required to implement the change
- Be able to describe the team leads, committees and oversight bodies that are involved in the implementation of the change and how change is executed
- According to their role, responsibility, and duties, be able to describe required change management steps regarding documentation and traceability of the change, including logs, correspondence and documentation
- Be aware of change management implementation requirements for rollback plans and the learner's responsibilities and duties associated with potential rollback

# Persona 3 - Vendor Management

- Be aware of the organization's Vendor Procurement and Due Diligence Policy and how to locate it.
- Be aware of the inputs to a Vendor Procurement Plan, including specifications and requirements for both the vendor and the input, product, or service
- Be familiar with organizational requirements and thresholds for representations, warranties, indemnifications, and "hold harmless clauses", including existing legal templates and model contracts
- Be able to describe the inputs to the vendor procurement plan and the anticipated evaluation method
- Be able to identify the contract associated with each vendor and understand its clauses, applicable to roles and responsibilities
- Be able to assess whether the input, product, service, and/or vendor remains within specifications of the Vendor Procurement Plan.
- Be able to describe the process to conduct an audit of a vendor and/or their input, product, or service, if applicable to roles and responsibilities

# Persona 3 - System Development

A. Be aware of the enterprise-wide system architectural frameworks (e.g., TOGAF, Zachman) and he organization's life cycle development standards and model development and governance processes and standards (e.g., OWASP, CRISP-DM) and associated user guides or tools to assist with conformity and usage

B. Be aware of the need for segregation of live production and development environments and when to use/interact with each environment

C. Be aware of and able to identify enterprise-wide standards for
    i. Coding language (e.g., notes processing, structural guidelines),
    ii. Hardware/software tools,
    iii. Availability of Source Data,
    iv. Applicable data scheme for Pipeline Data
    v. Software development processes (e.g., agile, waterfall)

D. Be aware of security requirements associated with the development of systems and/or components:
    i.  secure work areas and applicable access requirements
    ii. Penetration testing and Vulnerability scanning

E. Be able to identify  the process for model/system development validation, including usability and accessibility testing and associated metrics, measurements, and thresholds for sufficiency

F. Be familiar with the documentation requirements associated with System Development, include storage requirements

G. Be aware and able to understand all graphical representations of the AAA System (e.g., **System Architecture Report, Process Architecture Report, Data Flow Diagram, Technical Governance and Architecture, Process Integration Report**, **Governance**

H. Upholding intellectual property rights (e.g., software sourcing and licensing)

# Persona 3 - Quality Management

- Be able to describe and explain quality objectives including how to implement the quality objectives
- Be able to identify, explain, and locate the Quality Management Policy..
- Be aware of the roles and responsibilities assigned to the learner within Quality Management, including where and how to seek help or guidance.
- Be aware of how the Quality Management Policy and subsequent implementation satisfies regulatory obligations and organizational quality standards.
- Be able to explain how quality management integrates with other organizational processes, including Risk Management, Cybersecurity, Data Management, Monitoring, and Incident Response.
- Be able to identify and describe quality assurance activities including basic processes for quality control and validation of the system's fitness for purpose.
- Be aware of the necessity of and procedures for record-keeping storage and retention as outlined in the Quality Management Policy.
- Be able to describe the importance and process for identifying risks or quality concerns.
- Be aware of quality management roles and responsibilities in regards ot vendor procurement and management
- Be aware of the existence and purpose of the Quality assurance documentation,

# Persona 3 - Regulatory Compliance

A. Be able to identify the AI Compliance Lead?
B. Be aware that the AI Compliance Lead handles all communications with Supervisory Authorities, Auditors, and/or Notified Bodies
C. Be aware that the organization has reporting requirements to Supervisory Authorities and the thresholds for both serious incidents and reportable incidents, as applicable to roles and responsibilities
D. Be able to identify whether applicable **Relevant Legal Frameworks** require the **AAA System** to undergo certification or equivalent assurance (e.g., conformity assessment), prior to being placed on the market
    i. and if applicable, how to correctly affix marks of conformity and/or assurance
    ii. and if applicable, how to compile **Corrective Action Plans** from internal stakeholders
    iii. and if applicable, that beta testing (real world testing) has communication requirements to Supervisory Authorities
E. Be aware that **Change Management Plan** must be shared with  the assurance provider or Notified Body prior to execution
F. Be able to identify processes and procedure applicable to retention of all record keeping
G. Be aware of and be able to locate all relevant technical documentation and logs associated with the **AAA System**
H. Be aware that AAA System may need to be registered with applicable national or regional registries
I. Be aware that the withdrawal of the **AAA System** from the market is filed with the Supervisory Authority
J. Be familiar with and able to operate technology that supports regulatory compliance and which jobs or duties the technology can assist with?

# Metrics of Successful AI Literacy Training - Persona 3
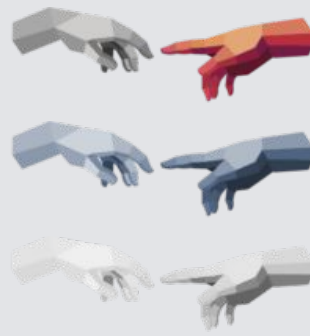
**Based upon an assessment of the risk of the AAA System from the ARC**

**Limited & Minimum Risk AI**

- Minimum - Measurement of completion with learning and training during the assessment
- Recommended - closed book assessment of knowledge attained - with a minimum pass rating

**High-Risk AI**

- Minimum - closed book assessment of knowledge attained with a minimum pass rating
- Evaluate assessment results with business scenarios.
- Track AI policy adherence through audits.

# Metrics of Successful AI Literacy Training - Persona 3

**Feedback & Improvement (TEAM)**

- **Track** voluntary additional AAA System learning to gauge engagement and inform future training.
- **Establish** a system for regularly gathering and reviewing user feedback on AAA Systems to identify evolving literacy needs.
- **Analyze** training feedback (positive/negative) and user system feedback for literacy gaps.
- **Measure** impact of feedback-driven changes on subsequent training effectiveness.
- Incentivisation (e.g., Badges of honor for completion, AI Literacy Champions, Highlighting educational achievements)
- Incentivisation - pay packages and bonuses tied to
  - Reductions in Adverse Incident Reports
  - Reductions in Residual Risk
  - Reductions in Government or Judicial enforcement

# Persona 4

# Persona 4 - Constituents

- C-suite, Board of Directors, and any/all officers of the organization
- If applicable, Founders and Investors

# Persona 4 – Training Overview

- Persona 4 learning objectives include all appropriate and applicable LO's from Persona's #1-2
- Persona 4 learning objectives are focused on enterprise-wide perspectives and solutions from all of the Persona 3 learning objectives (16 Pillars)
- The learning coordinator should examine aspects of Persona 3 learning objectives to determine appropriate inclusion in the Persona 4 learning objectives
- Frequency of training should be ongoing and regular in accordance with the risk of the AAA Systems and the growth, use, and adoption of AAA Systems firm-wide

# Persona 4 – How to compile the Training

1. In Context - What does the learner need to know?
   a. Are we a Provider or Deployer?
   b. Deployment of AAA Systems both in specific and enterprise-wide
   c. Alignment of any AAA System usage to the Code of Ethics
   d. Duties and Responsibilities of Top Management & Oversight Bodies in regards to each AAA System (Risk Appetite, Tolerance, and Residual Risk Approval)
   e. Riskiness and potential harms of each AAA System
   f. Benefits of the AAA Systems
   g. Understanding stakeholders
      i. Ensure equity of Persona 3 requirements for AI Literacy and fair compensation for time
      ii. Impact on employment regarding AAA System usage and implementation

# Persona 4 – How to compile the Training

1. Organization-wide controls
   a. Risk Management
      i. Generic governance, oversight, accountability
      ii. Establishing Risk Appetite and Tolerance
      iii. Insurance, if applicable
      iv. Residual Risk acceptance
   b. Training and Education
   c. Employee-raised questions (including Whistleblower rights)
   d. Processes for handle law enforcement and regulatory inquiry
   e. Quality (objectives) and Regulatory governance, oversight, and accountability
   f. Organizational governance policies for AAA Systems
   g. Legal oversight

# Persona 4 – How to compile the Training

1. Enterprise-wide practices
   a. How operational teams integrate and interact with the Board and the C-suite
   b. Inventory list of AAA Systems (including access), describing the Scope, Nature, Context, and Purpose
   c. Committee Governance Assessment - oversees the interactions of all of the following:
      i. Risk Management (ARC, Ethics Committee, Specialty Committees)
      ii. Data Management and Governance (ARC, Data Lead)
      iii. Monitoring (ARC, Monitoring Lead)
      iv. Incident Response (All bodies)
      v. Vendor Management (ARC)
      vi. Change Management (ARC)
      vii. Security (ISOC)
      viii. Quality Management (Quality Management Lead)

# Persona 4 - Generic Training Overview

- Be able to describe Relevant Legal Frameworks, Jurisdictions of operations of the AAA System
- Be able to describe generic risk associated with each sector of operation of the AAA Systems and the organization's processes and procedures to control, treat, and mitigate those risks
- Be able to describe and locate the Code of Ethics, Code of Data Ethics, and shared moral framework of the organization in regards to AAA System(s)
- Be able to describe the infrastructure of governance, oversight, and accountability - Committee Governance Assessment  (e.g., Algorithmic Risk Committee, Ethics Committee, Quality Management, Cybersecurity)
- Be aware of budgets and be able to locate line item details regarding resource allocations for AAA Systems
- Be able to describe the metrics, measurements, and thresholds associated with Risk Appetite and Risk Tolerance, including accepted Residual Risk and associated disclosures
- Be aware of duties, roles, and responsibilities associated with AAA System communications to both direct and indirect impacted stakeholders
- Be able to describe the process and/or procedures to resolve internal conflicts
- Be able to explain the strategic decision-making process that weighs business objectives and risks including performance monitoring

# Persona 4 - Expert Oversight

- Be able to describe the specific and unique risks associated with the governance of AAA Systems
- Be able to explain why expert oversight is necessary in regards to the governance of AAA Systems
- Be able to explain how expert oversight mitigates risk to the organization and maximizes the benefits of AAA Systems to the widest possible stakeholder base

# Persona 4 - Enterprise-wide Governance

- Be able to explain the infrastructure of accountability (e.g., Algorithmic Risk Committee, Ethics Committee, and Leads) within the organization for the operation of AAA Systems
- Be able to describe the allocation of resources (people, budget, infrastructure)
- Be able to describe the regulatory compliance obligations of the AA System deployment
- Be able to explain the importance of and process for generating AI Literacy awareness and training
- Be able to explain the duty to raise AI Literacy awareness enterprise-wide.
- Gap analysis on governance, oversight, and accountability frameworks

# Metrics of Successful AI Literacy Training - Persona 4

- Notification of requirement
- Minimum of - Measurement of completion that acknowledges understanding and learning as you go
- Recommended - knowledge assessment with a minimum passing score
- Alignment to the organisation's Code of Ethics and any applicable professional responsibility and ethics

# Metrics of Successful AI Literacy Training - Persona 4

Based upon an assessment of the risk of the AAA System from the ARC

- Does the Board believe that they have the information, processes, and procedures to execute their stewardship and fiduciary obligations - survey
- Knowledge checks and education on correct answers - with a final required minimum standard
- Minimum annual checks recommended
- Incentivisation (e.g., Badges of honor for completion, AI Literacy Champions, Highlighting educational achievements)
- Incentivisation - pay packages and bonuses tied to
  - Reductions in Adverse Incident Reports
  - Reductions in Residual Risk
  - Reductions in Government or Judicial enforcement

# Persona 5

# Who is included in Persona 5?

- Members of the Algorithmic Risk Committee,
- Members of the Ethics Committee
- Applicable members of any specialty committees,
- Data Lead
- Test Lead
- AAA Cybersecurity Lead
- Monitoring Lead
- Quality Management Lead
- AI Compliance Lead

# Persona 5 - Training Overview

- Persona 5 learning objectives include all appropriate and applicable LO's from Persona's 1&2
- Persona 5 LOs to include Persona 4 LO's that have direct and immediate impact to the Persona 5 (e.g., Risk Appetite and Tolerance)
- Persona 5 LOs include interoperability of each sector of Persona 3 training, including roles, responsibilities and interaction and associated duties amongst AAA Systems experts
- Frequency of training should be ongoing and regular in accordance with the growth, use, adoption, and maturity of the AAA System(s)
- Proportionate according to their knowledge, expertise, impact, usage, and/or responsibility associated with the **Scope, Nature, Context, and Purpose** of the **AAA System**

# Persona 5 - Specific Interoperability Training

A. Understanding of direct and indirect stakeholders
B. Current awareness of risks and harms applicable to the AAA System
C. State-of-the-art awareness of risk controls, treatments, and mitigations
D. Understanding of potential systemic risk
E. Establishing expert oversight for AAA System
F. Establishing ethical oversight
G. Risk Management policy
H. Data Management and Governance policy
I. Testing and Evaluation processes and procedures
A. Transparency and Documentation processes and procedures
B. Monitoring Policy
C. Change Management processes and procedures
D. Incident Response processes and procedures
E. Vendor Management processes and procedures
F. System Development processes and procedures
G. Quality Management policy
H. Decommissioning Policy

# Persona 5 - How to compile the Training

1. **In Context -** **What does the learner need to know?**
   a. **Identifying impacted stakeholders**
   b. **Acceptable use and applicable Terms and Conditions**
   c. **Prohibited uses**
   d. **Expected corporate culture, requirements, and incentivization programs from the C-suite and Board that align to the following benchmarks:**
      i. **Code of Ethics**
      ii. **Code of Data Ethics**
      iii. **Corporate mission**
   e. **Generic risk training associated with AAA System(s), especially use case centric risks**

3. Tool specific training - What does the AAA System do?
   a. Its Scope, Nature, Context, and Purpose and capabilities
   b. How does the learner's role facilitate achievement of the system's Purpose
   c. Metrics, measurement, and thresholds for monitoring model health and fitness
   d. Risk Management (algorithmic, ethical, and cybers) frameworks and processes including, but not limited to:
      i. Bias Mitigation
      ii. Control
      iii. Transparency
      iv. Disclosure
      v. Privacy-by-design
      vi. Incident management
      vii. Change management
      viii. Procurement

3. **According to roles and responsibilities -**
   a. What is my role/duty?
   b. How to interact, manage, oversee the AAA System?
   c. Nature of the UX/UI between the User and the AAA System and associated risks and harms
4. **Associated with usage, interaction, or support of the AAA System**
   a. Human interaction(s) and associated controls and potential risks
   b. Error remediations processes and procedures (Incident response, Adverse Incident Reporting Systems)
   c. Standard reporting functions on normal operations
5. **Systemic Risk associated with the AAA System**
   a. How it is measured?
   b. Changes over time
   c. Associated risk controls, treatments, and mitigation

# Persona 5 - Learning Objectives

- Be able to describe the process used to evaluate direct and indirect stakeholders and the outcomes in regards to the AAA System
- Be aware and able to describe current and emerging risks and harms applicable to the AAA System(s)
- Be aware and able to describe state-of-the-art risk controls, treatments, and mitigations
- Be aware of the processes and procedures designed to measure potential systemic risk and the relative changes over time in the context of stakeholders
- Be aware of the accountabilities, duties, and responsibilities of Top Management and Oversight Bodies in regards to AAA Systems

# Persona 5 - Stakeholder Identification

- Be aware of and able to explain the difference between stakeholders including understanding the process to determine stakeholders such as:
  - Direct stakeholders
    - Differentiating between direct-internal (employees, management) and direct-external (Customers, prospects) stakeholders
  - Indirect (e.g., society, environment)
- Be able to describe the mechanism to determine who is an impacted stakeholder, including describing metrics, measurements, and thresholds
- Be aware of the process to include stakeholder feedback (including red-teaming)
  - Where is the feedback included?
  - When are they involved?
  - How are they invited to contribute?
- Be able to describe how Protected Categories, Intersectionalities, and Vulnerable Populations are actively identified and included, including describing the Duty of Care to Vulnerable Populations
- Be able to describe the risk assessment process including stakeholder feedback on risk inputs, indicators and subsequent severity and likelihood analysis

# Persona 5 - Emerging Risks and Harms

- Be able to describe risk taxonomy and classification frameworks for the organization
- Be able to apply taxonomy and classification to the AAA System to scan for emerging risks and harms
- Be able to describe the analysis and evaluation process in regards to emerging risks and harms
- Be able to describe the mechanisms and locations for scanning for emerging risks and harms
- Describe the process for delineation of duties and responsibilities for implementing risk controls, treatments and mitigations for emerging risks and harms
- Be able to describe the process to assess emerging risks and determining sufficient domain expertise and impacted stakeholders to properly analyze and evaluate the risk
- Be aware of mechanisms and resources designed to foster awareness of state-of-the-art risk controls, treatments, and mitigation

# Persona 5 - State-of-the-art awareness of risk controls, treatments, and mitigations

- Be able to identify new risk controls, treatments, and mitigations applicable to the AAA System
- Be aware of sources of information (e.g., academia, journals, trade shows) that discuss state-of-the-art techniques
- Be aware of societies and other organisations that promote development of new problem solving techniques and tools
- Be able to describe a process for assessing the cost-benefit and implementability of state-of-the-art tools as they become actionable best practice

# Persona 5 - Systemic Risk

- Be able to describe the nature of the systemic risk, including impacted stakeholder (e.g., direct, indirect) and the process to determine systemic risk (e.g., Systemic Societal Impact Analysis)
- Be able to describe metrics, measurements, and thresholds (e.g., Authority, Importance, Saturation, Dependency) that identify systemic risk
- Be able to associate stakeholders (e.g., individuals, communities, nation-states, society) with measurements of systematic risk
- Be able to describe the duties and obligations of a Provider whose AAA System is systemically risky
- Be able to identify risk controls, treatments, and mitigations implemented in regards to systemic risk

# Persona 5 - Governance, Oversight, and Accountability

- Identify LOs that describe mechanisms for governance, oversight, and accountability of:
  - According to roles, responsibilities, and expertise
    - Be able to describe, understand, and be held accountable for applicable Persona 3 tasks
    - Be able to describe and identify sufficient competency in Persona 3 persons
    - Be able to describe, explain, and be held accountable for all Persona 3 tasks in the context of Algorithmic Risk Committee oversight
  - Be able to understand interoperability of tasks, dependency, and associated interactions
  - Be able to describe who does what to whom, including communications and Traceability
  - Be able to describe the reporting responsibilities to Top Management and Oversight Bodies

# Persona 5 - Upholding Principles and Values of Responsible AI in a Business Context

- Enterprise level risk of failure to uphold the principles of AI Literacy
  - Business risk
  - Strategic risk
  - Brand and reputation risk
  - Financial risk
  - Operational risk
- Examples may include the following:
  - Limiting corporate liability
  - Sustainability

# Metrics of Successful AI Literacy Training - Persona 5
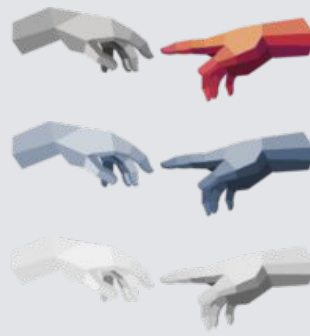
- Notification of requirement
- Minimum of - knowledge assessment with a minimum passing score
- Alignment to the organisation's Code of Ethics and any applicable professional responsibility and/or ethics
- Alignment to Corporate Goals such as brand reputation, limitation of corporate liability
- Minimum annual checks, if not more frequent according to the dynamic nature of the AAA System
- Incentivisation (e.g., Badges of honor for completion, AI Literacy Champions, Highlighting educational achievements)
- Incentivisation - pay packages and bonuses tied to
  - Reductions in Adverse Incident Reports
  - Reductions in Residual Risk
  - Reductions in Government or Judicial enforcement