

The AI Principles for NI

1. To what extent do you agree with the proposed AI principles for NI?

9/10

Belfast City Council strongly supports the proposed AI principles and their focus on trust, environmental sustainability, accountability and societal benefit. AI should be used to augment staff capability, improve services and deliver better outcomes for citizens.

With this in mind, the Strategy should place greater emphasis on AI adoption across the economy and public services, recognising that the key challenge is diffusion and implementation rather than capability creation.

Belfast City Council notes that AI adoption is already well underway across the workforce and broader economy. Evidence suggests that significant numbers of people are already using generative AI tools and expect their use to increase substantially over the coming years. The key policy challenge is therefore no longer whether AI will be adopted, but ensuring adoption is inclusive, responsible, well-governed and supported through appropriate skills, training and organisational capability.

Belfast City Council believes the Strategy should explicitly recognise local government as a key delivery partner in Northern Ireland's AI ecosystem. Councils are already leading collaborative work on AI adoption, service transformation and organisational readiness through programmes such as the Belfast Region City Deal AI Adoption Programme. The Strategy should therefore support the role of local authorities in translating national strategy into place-based implementation, experimentation and adoption.

2. To what extent do you agree with the overarching vision for Principle 1: Human Oversight)? 9/10

Belfast City Council strongly supports Human Oversight as a foundation of responsible AI. AI should enhance, not replace, human judgement and accountability. Oversight arrangements should be risk-based, with greater scrutiny of high-risk applications. Citizens should be able to understand, challenge and seek review of AI-supported decisions. Local government should be represented in oversight arrangements.

Belfast City Council believes local government should be explicitly recognised as a key delivery partner for Human Oversight. Councils deliver a broad range of citizen-facing services and are well placed to contribute practical experience in

balancing innovation, governance and public accountability. Oversight arrangements should therefore include local government representation and be supported through multidisciplinary expertise, training and knowledge-sharing networks.

Specifically, what is your opinion of the following priority actions for the public sector?

- Creation of Human Oversight Teams
Agree Disagree Don't know
- Framework for operation of Human Oversight Teams
Agree Disagree Don't know
- Human Oversight Disclosure Plans
Agree Disagree Don't know

The Council supports Human Oversight Teams, common frameworks and disclosure plans. Arrangements should be proportionate and aligned with existing governance structures, with clear guidance on accountability, training and escalation.

3. **To what extent to you agree with the overarching vision for Principle 2: Accountability & Redress?** 9/10

Belfast City Council strongly supports the principle of Accountability and Redress. Public trust in Artificial Intelligence will depend on clear accountability arrangements, transparency regarding how AI is used, and effective mechanisms for addressing issues when things go wrong. Citizens should have confidence that public bodies remain accountable for decisions and outcomes, regardless of the technology used to support them.

Clear accountability is essential to maintaining public confidence and there is a need for consistency of approach across the sector. Citizens must understand who remains responsible for decisions supported by AI systems and how concerns can be raised and resolved.

Specifically, what is your opinion of the following priority actions for the public sector?

- Definition of redress mechanisms
Agree Disagree Don't know
- Designation of accountable officers
Agree Disagree Don't know
- Process for identification and disclosure of errors

Agree Disagree Don't know

The Council supports accountable officers, redress mechanisms and error reporting. Processes should promote transparency, learning and continuous improvement while remaining accessible and understandable to citizens.

4. **To what extent to you agree with the overarching vision for Principle 3: Data Governance?** 9/10

The Council strongly supports Data Governance as a prerequisite for trusted AI adoption. The Strategy should recognise ongoing public sector challenges around data quality, information governance, legacy systems and organisational maturity. Investment in data and information management capability is essential.

We would also encourage recognition of the resource implications associated with these proposals. Many public sector organisations, particularly within local government, have limited specialist capacity across Data Protection, Information Governance, Records Management, Information Compliance and Data & Analytics functions. The introduction of additional governance, monitoring and assurance requirements for AI must be accompanied by practical guidance, shared frameworks, training and support mechanisms.

Specifically, what is your opinion of the following priority actions for the public sector?

- Amendment of DPIAs to integrate AI principles
Agree Disagree Don't know
- Requirement for data governance logs
Agree Disagree Don't know
- Visibility of organisational DPOs
Agree Disagree Don't know
- Document validation and verification
Agree Disagree Don't know
- Public-facing database of FAQs
Agree Disagree Don't know

The Council supports incorporating AI considerations into DPIAs and maintaining governance records. Guidance, templates and reporting requirements should be proportionate and supported by shared frameworks and practical tools.

5. **To what extent to you agree with the overarching vision for Principle 4: Technical Safety & Security?** 9/10

Belfast City Council strongly supports the principle of Technical Safety and Security. AI governance should align with existing cyber security, risk management and assurance frameworks. Public confidence depends on secure, reliable and resilient AI systems.

Specifically, what is your opinion of the following priority actions for the public sector?

- Embedding of deep technical expertise in oversight teams
Agree Disagree Don't know
- Adoption of appropriate public sector standards
Agree Disagree Don't know
- Design and declaration of consistency testing
Agree Disagree Don't know
- Implementation of approaches for verification of AI systems
Agree Disagree Don't know

The Council welcomes the emphasis on technical expertise, standards, testing and verification. Public bodies will require shared guidance, standards and support to develop the necessary capabilities alongside wider data and governance maturity.

Public sector organisations should not be expected to become AI-ready before they are data-ready, governance-ready and cyber-ready. These capabilities are mutually dependent and should be developed in parallel.

6. **To what extent to you agree with the overarching vision for Principle 5: Fairness & Transparency** 9/10

Belfast City Council strongly supports the principle of Fairness and Transparency. Organisations should be open about how AI is used and demonstrate that appropriate safeguards and accountability are in place. AI systems should be monitored to identify and mitigate bias.

Public trust will be fundamental to the successful adoption of AI across the public sector and can only be achieved where organisations are open about how AI is being used, where appropriate safeguards are in place, and how accountability is maintained.

Specifically, what is your opinion of the following priority actions for the public sector?

- Ensuring bias detection methods are built into AI models
Agree Disagree Don't know
- Creation of a repository for all AI projects
Agree Disagree Don't know
- Design of comms materials for AI projects
Agree Disagree Don't know

The Council supports bias detection measures, AI project repositories and communication materials. Transparency should focus on both how AI is used and the benefits delivered for citizens and communities. We welcome the proposal to establish repositories and registers of AI projects to strengthen transparency, encourage collaboration and reduce duplication across organisations.

7. To what extent to you agree with the overarching vision for Principle 6: Environmental Sustainability 9/10

Belfast City Council strongly supports the principle of Environmental Sustainability and agrees that the environmental impact of Artificial Intelligence should be considered alongside its economic and societal benefits.

As the use of AI expands across the public sector, organisations should seek to understand and minimise environmental impacts while ensuring that AI is used to deliver positive outcomes for citizens and communities.

Specifically, what is your opinion of the following priority actions for the public sector?

- Requirement to detail how AI projects contribute to a sustainable future
Agree Disagree Don't know
- Disclosure of energy source and usage for all AI projects
Agree Disagree Don't know
- Reporting of mitigations to support environmental sustainability
Agree Disagree Don't know

The Council supports sustainability reporting and mitigation measures. Requirements should be proportionate and reflect the limited visibility many organisations have of supplier infrastructure. Greater emphasis should be placed on sustainable procurement, supplier transparency and wider environmental benefits enabled by AI.

For example, AI may support more efficient public services, reduce unnecessary travel, optimise resource allocation, improve asset management, support climate resilience initiatives and enable better evidence-based decision-making

8. To what extent to you agree with the overarching vision for Principle 7: Societal Benefit? 10/10

Belfast City Council strongly supports the principle of Societal Benefit and believes it should be a central consideration in the design, deployment and evaluation of all AI initiatives across the public sector. The ultimate measure of success for AI should not be whether it has been implemented, but whether it demonstrably improves outcomes for citizens, communities and society as a whole. AI should be adopted to enhance public value, improve services and support the delivery of better social, economic and environmental outcomes.

Specifically, what is your opinion of the following priority actions for the public sector?

- Integration of a cost-benefit matrix into all AI projects
Agree Disagree Don't know
- Inclusion of metrics to measure efficiency, experience and outcomes for AI projects
Agree Disagree Don't know
- Production of impact summaries at project completion
Agree Disagree Don't know

Belfast City Council welcomes the proposal for organisations to assess benefits and impact measures. Evaluations should include accessibility, inclusion, service quality, productivity, sustainability and wider societal outcomes.

To support accountability and public trust, organisations should clearly articulate the intended benefits of AI projects at the outset and evaluate whether those benefits have been realised. The publication of impact summaries is therefore welcomed, provided a proportionate and consistent approach is adopted across the public sector.

9. To what extent to you agree with the overarching vision for Principle 8: Training & Literacy? 10/10

Belfast City Council strongly supports the principle of Training and Literacy. Skills initiatives should focus on practical implementation, organisational readiness, change management and knowledge sharing, alongside technical skills.

Greater emphasis should be given to SMEs and smaller organisations, where adoption levels often lag larger organisations. Skills programmes should be complemented by mentoring, peer learning, financial support, SME procurement and innovation opportunities, demonstrator projects and opportunities to learn from practical implementation experience with measurable SME adoption targets.

Knowledge transfer and organisational learning should become explicit objectives of public sector AI programmes. Successful pilots and projects should generate practical insights that can be shared across organisations to accelerate capability development and reduce duplication of effort.

Specifically, what is your opinion of the following priority actions?

- Training for all public sector staff on AI basics
Agree Disagree Don't know
- Development of AI-specific career pathways within the public sector
Agree Disagree Don't know
- Integration of training development leads and trainees into Human Oversight Teams
Agree Disagree Don't know
- Inclusion of training assessment and development plan into all public sector AI projects
Agree Disagree Don't know
- Establishment of a Public Sector Skills Academy
Agree Disagree Don't know
- Establishment of AI Workforce Impact Observatory
Agree Disagree Don't know

The Council supports training, career pathways, skills academies and workforce monitoring. The Strategy should place greater emphasis on digital inclusion, SME adoption and ensuring all communities can benefit from AI.

There is a risk that existing inequalities could be reinforced if access to technology, skills and opportunities develops unevenly. Public services should therefore remain inclusive and accessible while targeted interventions help ensure all communities can participate in and benefit from an increasingly AI-enabled society

Belfast City Council supports the establishment of a Public Sector Skills Academy and to support sharing good practice, reduce duplication, improve consistency and accelerate capability building across Northern Ireland.

The Council further welcomes consideration of workforce impacts associated with AI adoption. Monitoring how AI affects roles, skills requirements and workforce planning will help organisations prepare for change, identify emerging skills gaps and ensure that the benefits of AI are realised in a way that supports employees and improves public services.

AI Governance

10. To what extent to you agree with the overarching vision for AI Governance? 9/10

The Council strongly supports the proposed approach to AI Governance. Governance should enable responsible innovation while maintaining accountability, transparency and public trust. We also support the development of an AI Governance Framework and Code of Practice that provides practical guidance on oversight, accountability, transparency, workforce engagement, risk assessment and responsible deployment.

The Strategy would benefit from clearer implementation arrangements and delivery mechanisms. Consideration should be given to establishing a dedicated delivery mechanism with responsibility for coordinating activity, monitoring progress, supporting adoption and reporting on outcomes. Strong governance should be complemented by clear ownership, delivery milestones and appropriate resourcing.

Specifically, what is your opinion of the following priority actions?

- Development of a governance framework and tool for public sector use with AI projects
Agree Disagree Don't know

- Establishment of a cross-sectoral AI governance board for public sector projects
Agree Disagree Don't know

Production of internal inventories of AI projects across all public sector bodies
Agree Disagree Don't know

- Delivery of bite-sized AI governance training for public & private sector leaders
Agree Disagree Don't know

The Council supports a common governance framework, governance board, AI inventories and leadership training. Governance responsibilities extend beyond technical specialists and require senior leaders, elected representatives and managers to understand both the opportunities and risks associated with AI adoption. Developing leadership capability will be essential to achieving responsible and effective use of AI.

Governance should be risk-based, integrated with existing structures and supported by multidisciplinary expertise.

AI & Infrastructure

11. To what extent to you agree with the overarching vision for AI & Infrastructure? 8/10

Belfast City Council strongly supports the proposed vision for AI and Infrastructure. Successful AI adoption depends on strong digital infrastructure, high-quality data and effective information sharing.

Through Council's City Innovation Office, Economic Development Department, Innovation City Belfast, and the Belfast Region City Deal. Belfast is also well positioned to support place-based AI experimentation and demonstration projects that could be scaled across Northern Ireland. Support for test-bed, experimental environments will help to de-risk investments and build capabilities.

The Strategy should also provide guidance on AI procurement and innovation procurement approaches, helping organisations access emerging technologies while maintaining high standards of value for money, transparency, ethics and accountability.

Specifically, what is your opinion of the following priority actions?

- Development of an integrated data strategy for NI including data sharing infrastructure
Agree Disagree Don't know
- Identification of high value datasets across sectors for open publication
Agree Disagree Don't know
- Legislation for sharing datasets across sectors
Agree Disagree Don't know
- Development of a regional data centre
Agree Disagree **Don't know**
- Provision of sufficient high-performance compute facilities
Agree Disagree **Don't know**

- Creation of a central unit to enhance AI capability across the public sector
- Agree** Disagree Don't know

The Council particularly welcomes the proposal to develop an integrated data strategy and strengthen data sharing arrangements across sectors. We welcome the proposal for a central unit to support AI capability across the public sector. However, its role should extend beyond AI and recognise the wider ecosystem of data governance, analytics capability, information management and digital transformation that underpins successful AI adoption.

The Council believes that infrastructure investments should ultimately be judged by their contribution to public value. The objective should not be to build AI infrastructure for its own sake, but to create the conditions that enable organisations to use data and AI safely, responsibly and effectively in the delivery of better outcomes for citizens and communities.

AI & Skills

12. To what extent to you agree with the overarching vision for AI & Skills? 10/10

Belfast City Council strongly supports the proposed vision for AI & Skills and believes that people, skills and organisational capability will be fundamental to the successful adoption of AI across Northern Ireland.

While the Strategy places welcome emphasis on capability development, Belfast City Council believes there should be a stronger focus on accelerating AI adoption amongst SMEs, the voluntary and community sector and indigenous businesses. Targeted support combining expert advice, grant support, mentoring and demonstration projects could help accelerate adoption and improve productivity.

The Council also recommends a stronger emphasis on workforce transition. Monitoring workforce impacts and supporting adaptation should be treated as a strategic priority alongside technical skills development.

Alongside technical skills development, organisations require support in change management, service redesign, workforce adaptation and adoption planning. Invest NI is likely to play a key role with its client companies but this is currently absent from its strategy.

Skills interventions should be closely linked to practical adoption support, helping public bodies and businesses understand where AI can create value, how risks can be managed and how organisational benefits can be realised.

Specifically, what is your opinion of the following priority actions?

- Audit of educational provision across the region
Agree Disagree Don't know
- Scoping of AI needs for community and voluntary sector
Agree Disagree Don't know
- Further integration of AI use into teacher training provision
Agree Disagree Don't know
- Development of region-wide guidance for use of AI in schools
Agree Disagree Don't know
- Roll-out of public awareness campaign promoting access to freely accessible basic skills training
Agree Disagree Don't know
- Integration of basic AI training into new staff inductions across sectors
Agree Disagree Don't know
- Creation of mechanisms for mentorship, sharing best practice, and peer advocacy for organisational leaders
Agree Disagree Don't know

The Council supports efforts to improve AI literacy among citizens, schools, community organisations and public sector staff. Access to training should be inclusive and help ensure that the benefits of AI are available to all sections of society.

Belfast City Council believes skills development should also focus on the uniquely human capabilities that become increasingly important in an AI-enabled workplace. Critical thinking, ethical decision making, communication, creativity, professional judgement, relationship building and citizen engagement are all likely to become more valuable as AI takes on routine and administrative activities.

The Council welcomes the proposed emphasis on leadership development, mentoring and sharing good practice. Public sector leaders need sufficient understanding of AI to govern its use effectively, make informed decisions and identify opportunities to improve services while managing associated risks.

AI & Public Sector Transformation

13. To what extent to you agree with the overarching vision for AI & Public Sector Transformation? 9/10

Belfast City Council strongly supports the proposed vision for AI and Public Sector Transformation. AI should be viewed as an enabler of better services and outcomes rather than an end in itself. Local government can play an important role in piloting and scaling responsible AI innovation.

Local authorities are particularly well placed to support testbeds for responsible AI innovation due to the breadth of services they provide and their close relationships with citizens and communities. Place-based pilot programmes can generate valuable learning to support transformation and can subsequently be scaled across the wider public sector.

Specifically, what is your opinion of the following priority actions for the public sector?

- Use of a Citizens' Panel for feedback and positive change
Agree Disagree Don't know
- Identification of potential use cases and targets for public sector AI transformation
Agree Disagree Don't know
- Provision of guidance on quantifiable measurements of success or failure
Agree Disagree Don't know
- Publication of quarterly registry of all AI projects across the public sector
Agree Disagree Don't know
- Establishment of CAIR establish 'CAIR' (Collaborative AI Resource) to provide training across government departments
Agree Disagree Don't know

Council supports use-case development, measurement frameworks, project registries, citizen engagement and collaborative capability initiatives. However, we would encourage the final Strategy to place a stronger focus on benefits realisation and service transformation. Success should be measured through improvements in service quality, accessibility, productivity and public value.

The Council also welcomes the proposal to establish collaborative capability through the CAIR model. Given the current shortage of specialist expertise across AI, Data & Analytics, Information Governance and Cyber Security disciplines, collaborative approaches have the potential to reduce duplication,

improve consistency and accelerate learning across public sector organisations throughout Northern Ireland.

AI & Citizens

14. To what extent do you agree with the overarching vision for AI & Citizens? 10/10

Belfast City Council strongly supports the proposed vision for AI & Citizens and agrees that public trust, transparency and citizen engagement must be central to the successful adoption of Artificial Intelligence across Northern Ireland. The long-term success of AI will depend not only on technological capability but on public confidence that AI is being used responsibly, ethically and in a manner that delivers genuine benefits for individuals, communities and society.

Specifically, what is your opinion of the following priority actions for the public sector?

- Development of an awareness-raising campaign to showcase public sector AI projects and benefits
Agree Disagree Don't know
- Creation of a publicly available AI Register of Systems
Agree Disagree Don't know
- Establishment of an AI Citizens' Panel
Agree Disagree Don't know
- Evaluation of benefits of an AI Charter
Agree Disagree Don't know

Belfast City Council welcomes proposals to increase transparency regarding public sector use of AI. A publicly available AI Register has the potential to strengthen trust, improve accountability and provide citizens with clear information about how AI is being used. Such a register should focus on explaining what AI is being used for, what benefits are expected, what human oversight arrangements exist and how concerns or complaints can be raised. Information should be accessible and understandable to non-technical audiences.

The Council supports awareness campaigns, AI registers, citizens' panels and exploration of an AI Charter. The Strategy should place greater emphasis on digital inclusion to ensure no citizens are disadvantaged by increasing adoption of AI.

15. Do you have any further comments?

Belfast City Council welcomes the development of a Northern Ireland AI Strategy and supports its ambition to establish a responsible, human-centred and trustworthy framework for AI adoption.

The Council believes the final Strategy would be strengthened through:

- a) Formal recognition of local government as a key delivery partner in AI governance, innovation and implementation - to share learning, capability and best practice.
- b) Greater emphasis on AI adoption and diffusion across public services, SMEs and communities to support inclusive growth and regional competitiveness.
- c) Greater emphasis on digital inclusion, AI literacy and workforce transition.
- d) Stronger commitment to supporting conditions for Northern Ireland to lead in promoting inclusive and place-based AI innovation - with living laboratories and regulatory sandboxes available to build capability across all sectors and support responsible innovation.
- e) Promotion of challenge-led innovation programmes that connect public sector organisations with AI solution providers to address real-world service challenges.
- f) Belfast City Council strongly supports the principle of Environmental Sustainability and agrees that the environmental impact of Artificial Intelligence should be considered alongside its economic and societal benefits. With this in mind, the public sector would benefit from an AI procurement framework to support ethical, transparent, sustainable and consistent procurement practices.

Belfast City Council's overarching view is that our challenge is increasingly one of AI diffusion, adoption and implementation rather than capability creation alone. The final Strategy should therefore combine strong governance and ethical principles with practical mechanisms that support organisations, businesses and communities to adopt AI safely, responsibly and at scale.