

October 7, 2026

Office of Science and Technology  
The Executive Office  
Stormont Castle  
Belfast BT4 3TT  
United Kingdom

**RE: Comments of the Association for Competitive Technology on Northern Ireland's Draft Artificial Intelligence Strategy**

Dear Sir or Madam:

The Association for Competitive Technology (ACT) welcomes the opportunity to comment on the draft Northern Ireland Artificial Intelligence Strategy (draft Strategy)<sup>1</sup> that the Executive Office (TEO) published for consultation in August 2026. ACT is a not-for-profit policy trade association that represents the global small business technology developer community. Our members are entrepreneurs, innovators, and independent developers who build software, connected devices, and AI-enabled products and services for consumers, businesses, and governments around the world, including in Northern Ireland and across the United Kingdom. Many of them supply AI tools to public sector customers or rely on AI tools built by others in order to compete, so the approach Northern Ireland takes to public sector AI adoption will shape whether they can serve that market.

ACT supports the ambition of the draft Strategy and its focus on the responsible adoption of AI across the public sector. We particularly welcome its commitment not to prescribe technologies, platforms, or digital solutions for individual organisations, its recognition that the UK's pro-innovation framework applies AI principles without placing them on a statutory footing, its encouragement of private sector innovation, and its call for modular, phased procurement that allows testing and evaluation before scaling. Our comments are intended to help TEO carry these commitments into implementation in a way that keeps requirements proportionate to risk, places each responsibility with the party best able to manage it, and keeps the Northern Ireland public sector market open to small and medium-sized enterprises (SMEs) from Northern Ireland and beyond.

**I. ACT's AI Policy Principles and AI Roles and Interdependency Framework**

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<sup>1</sup> THE EXEC. OFFICE, *Northern Ireland's Artificial Intelligence Strategy: Consultation Report* (Aug. 2026), <https://www.executiveoffice-ni.gov.uk/sites/default/files/2026-08/draft-ai-strategy-august.pdf>.

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Our recommendations reflect ACT’s eleven AI Policy Principles, which together call for a risk-based approach that builds on existing law, places responsibility for a given risk with the participant in the AI value chain best able to mitigate it, and maximises innovators’ ability to access and use data from a wide range of sources.<sup>2</sup>

1. **Understand the technology.** AI covers a wide range of tools, including machine learning, deep learning, and generative AI, each with different uses and risks, so an approach designed for one kind of AI or one sector may fit poorly with others.
2. **Understand how current law applies to AI.** Existing law already prohibits harmful conduct whether or not AI is involved, so policymakers should first establish how current rules apply before creating new or overlapping authorities.
3. **Quality assurance and oversight.** A risk-based approach should ensure that AI systems are safe and effective, with responsibility shared among developers, deployers, and users according to their ability to mitigate a given risk.
4. **Thoughtful design.** AI systems should be designed with input from users, developers, and other stakeholders, reflecting real-world workflows and human-centred design so that they benefit consumers and businesses.
5. **Access and affordability.** Policy should keep AI products and services accessible and affordable and leave developers free to build accessibility features into them.
6. **Research and transparency.** Policymakers should support AI research and development, enable innovators to collect and use data from a wide range of sources, and study the actual costs and benefits of transparency measures.
7. **Modernised privacy and security frameworks.** Privacy and security rules should protect personal data without placing unnecessary barriers on the data processing that AI depends on, with reasonable standards for data minimisation, consent, and individual rights.
8. **Bias.** All participants in the AI value chain should develop practices to identify and mitigate harmful bias, and regulators should examine data provenance where needed to prevent unlawful discrimination.
9. **Ethics.** Ethical frameworks should apply across the AI lifecycle, remain consistent with human rights, take account of all parts of the population, and protect sensitive personal information.
10. **Education.** Policy should support AI education for users and consumers, encourage academic curricula on AI and ethics, and keep stakeholders engaged so that frameworks stay responsive.

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<sup>2</sup> ASS’N FOR COMPETITIVE TECH., *AI Policy Principles* (Nov. 16, 2023), <https://actonline.org/wp-content/uploads/2023-11-16-ACT-AI-Policy-Principles-FINAL.pdf>.

- 11. Intellectual property.** Existing intellectual property protections should be preserved as AI governance develops, and compliance measures should not undercut intellectual property rights or trade secrets.

Our recommendations also reflect ACT's AI Roles and Interdependency Framework, which sets out how responsibility for managing AI risk is shared among the developers, deployers, and users of an AI system according to the knowledge and control each has over it.<sup>3</sup>

## **II. The AI Principles Should Align with the UK Framework and Apply in Proportion to Risk**

The eight principles in the draft Strategy closely track the five UK regulatory principles and the OECD AI Principles, which the draft Strategy itself acknowledges. ACT supports this alignment because firms that serve public sector customers in Northern Ireland also serve customers in Great Britain, Ireland, and other markets, and every regional variation in terminology or expectations adds compliance work that falls hardest on small firms. Where a Northern Ireland principle goes beyond the UK framework, as the Sustainability, Societal Benefit, and Training and Literacy principles do, the final Strategy should explain how departments are to apply it alongside the UK principles so that suppliers are not asked to meet two versions of the same expectation.

The principles should also be applied in proportion to risk. As drafted, the recommended actions apply uniformly to every AI project, so that each one would carry a human oversight team, a human oversight disclosure plan, consistency testing, and a cost-benefit assessment. These measures are appropriate for systems that inform decisions about an individual's benefits, health, liberty, or legal rights, but applying them in full to a document search function, a translation aid, or a meeting summary tool, the kinds of routine office tools the draft Strategy itself would roll out as a priority, would slow adoption of low-risk tools without improving outcomes for citizens. ACT recommends that the final Strategy adopt a tiered approach, consistent with the UK Government's AI Playbook<sup>4</sup>, under which the depth of oversight, testing, and documentation scales with the potential impact of each use case.

## **III. Procurement Requirements Should Follow Each Party's Role and Remain Open to SMEs**

The draft Strategy states that the principles will be applied in procurement and that suppliers must evidence how their AI systems support oversight, fairness, transparency, accountability, sustainability, training, and societal benefit. ACT supports clear procurement expectations, but the evidence asked of suppliers should match what suppliers control. A developer can document how a system was designed, trained, and tested, while the public body deploying it is best placed to assess how it performs in a particular service, to provide human oversight, and to offer redress to

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<sup>3</sup> ASS'N FOR COMPETITIVE TECH., *Comments on the Request for Information on the Development of an Artificial Intelligence (AI) Action Plan (90 Fed. Reg. 9088)* app. (AI Roles & Interdependency Framework) (Mar. 14, 2025), <https://actonline.org/wp-content/uploads/ACT-Comment-re-AI-Action-Plan-14-Mar-2025-w-appendix.pdf>.

<sup>4</sup> GOV'T DIGITAL SERV., *AI Playbook for the UK Government* (Feb. 2025), [https://assets.publishing.service.gov.uk/media/67aca2f7e400ae62338324bd/AI\\_Playbook\\_for\\_the\\_UK\\_Government\\_\\_12\\_02\\_.pdf](https://assets.publishing.service.gov.uk/media/67aca2f7e400ae62338324bd/AI_Playbook_for_the_UK_Government__12_02_.pdf).

citizens. Procurement requirements should follow that division of responsibility, which ACT's AI Roles and Interdependency Framework sets out, rather than asking suppliers to evidence outcomes that depend on how the buyer configures and uses a system. Any sustainability evidence should likewise rely on information that suppliers already publish at the facility or service level rather than on energy measurements for individual projects.

To keep these requirements within reach of SMEs, ACT recommends that TEO accept conformance with recognised international standards such as ISO/IEC 42001, adherence to the UK Government's AI Cyber Security Code of Practice<sup>5</sup>, and system documentation that suppliers already prepare for other markets as evidence against the principles. Departments and arm's-length bodies should use one standard set of supplier questions rather than separate questionnaires, and documentation demands should scale with the risk of the use case and the value of the contract so that small suppliers are not priced out of lower-value opportunities. The AICC's Core Assessment of Governance and Ethics (CAGE) tool, which the draft Strategy suggests adapting for public sector use, can serve as a helpful voluntary self-assessment resource, and it should remain an aid to suppliers rather than a pass or fail condition of award.

ACT strongly supports the draft Strategy's call for modular, phased contracts that allow testing before scaling and match the right tool to the right use case. TEO can make this approach more effective for SMEs by pairing it with smaller lot sizes, proportionate liability caps, insurance, and financial standing thresholds, no default requirement to hand over source code or model weights, prompt payment, and continued use of established UK procurement frameworks through which public bodies can buy commercial AI and cloud services quickly.

#### **IV. Human Oversight, Accountability, and Technical Safety Should Be Risk-Based**

ACT agrees that human oversight is essential where AI informs consequential decisions. The level of oversight should follow the risk of the use case, with "human in the loop" review reserved for high-impact decisions and "human on the loop" monitoring sufficient for most other uses. A departmental oversight function serving many low-risk projects would be a more practical use of scarce specialist staff than a dedicated team for every project. Named accountable officers are a sensible step, and redress for citizens should run through existing complaint routes, the Information Commissioner's Office, and the courts, so that a new mechanism does not duplicate them.

ACT welcomes the draft Strategy's reliance on the Government Cyber Security Strategy and on guidance from the National Cyber Security Centre, together with its commitment to compliance with recognised standards. Security also depends on strong encryption, and the final Strategy should confirm that public sector AI systems are expected to use it.

The draft Strategy also states that the same AI system should be maintained consistently throughout the project lifecycle. Modern AI systems, particularly those delivered as cloud services, are updated regularly to patch security vulnerabilities, improve accuracy, and reduce bias. A requirement to keep a system unchanged could leave public bodies running outdated and less secure versions. ACT recommends that the final Strategy instead require version tracking and

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<sup>5</sup> DEP'T FOR SCI., INNOVATION & TECH., *Code of Practice for the Cyber Security of AI* (Jan. 31, 2025), <https://www.gov.uk/government/publications/ai-cyber-security-code-of-practice>.

change management, with suppliers notifying deployers of material changes and deployers retesting high-risk uses when a change could affect performance.

## **V. Fairness and Transparency Measures Should Reflect Shared Responsibility and Build on UK Standards**

ACT supports the goal of identifying and mitigating harmful bias. Bias testing is a shared task in which a developer tests a model across its intended general uses and the deployer tests the system in its specific context, using data that reflects the population it serves. The recommended action that bias detection be built into AI models should be revised to reflect that shared responsibility.

The draft Strategy proposes both an internal inventory of AI use across the public sector (Section 4 of the draft Strategy) and a public AI Register of Systems (Section 8), along with a repository of public sector AI projects (Principle 5). ACT recommends that TEO combine these into a single register built on the Algorithmic Transparency Recording Standard used by UK government departments<sup>6</sup>, so that suppliers working across the UK provide information in one familiar format. Entries should describe how a system is used and what safeguards apply without requiring disclosure of security-sensitive details, source code, trade secrets, or other proprietary information. Notices to citizens that they are interacting with AI should focus on direct interactions where the use of AI is material to the citizen, rather than labelling every output that AI tools have helped produce.

## **VI. Governance Should Remain Advisory and Build on Existing Law**

ACT supports the draft Strategy's decision to distinguish public sector governance from private sector use of AI and to encourage commercial innovation. The proposed cross-sectoral AI Governance Board should play an advisory role, and its industry members should include SMEs and developers as well as larger firms. Private sector AI use in Northern Ireland is already governed by existing law, including data protection, equality, consumer protection, and product safety law, and by the UK-wide principles-based framework. The final Strategy should confirm that the eight principles are offered to the private sector as a voluntary reference and that no separate Northern Ireland regulatory regime for AI is planned. Given Northern Ireland's close trading links with both Great Britain and Ireland, firms supplying the region benefit most when expectations align with the UK framework and with international standards recognised in both markets.

## **VII. Data and Infrastructure Policy Should Be Open and Technology-Neutral**

ACT supports the draft Strategy's proposals to identify high-value datasets, publish them openly, and enable wider data sharing with appropriate privacy protections. Access to quality data is one of the main constraints on small AI developers. Published datasets will be most useful if they are released under consistent open licensing such as the Open Government Licence, in machine-readable formats, and through stable programming interfaces. The integrated data strategy that NISRA is developing should also allow data to be stored and processed wherever it can be secured, relying on the transfer mechanisms in the UK GDPR, and the final Strategy should not add any

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<sup>6</sup> *Algorithmic Transparency Recording Standard Hub*, GOV.UK, <https://www.gov.uk/government/collections/algorithmic-transparency-recording-standard-hub>.

requirement to keep data in Northern Ireland, since localisation requirements raise costs and fall hardest on small firms.

The draft Strategy states that Northern Ireland should develop its own AI compute capability to avoid vendor lock-in with cloud services and that sovereign, green, high-performance computing is essential. Public investment in high-performance computing for research can complement commercial cloud services, but it should not displace them or become a default preference in public sector procurement. For most public sector deployments, commercial cloud services provide security, resilience, scalability, and access to current AI models that a regional facility would find difficult to match, and the draft Strategy's own five-point plan rightly calls for all public bodies to have interoperable cloud-based facilities. Lock-in is best addressed through interoperability, open standards, data portability, and the modular contracting the draft Strategy already endorses. Consistent with its commitment to technology neutrality, the final Strategy should leave public bodies free to choose the infrastructure that best fits each use case. ACT also supports the draft Strategy's interest in attracting investment in data centres powered by Northern Ireland's renewable generation, which would strengthen the region's digital infrastructure and bring investment and jobs.

#### **VIII. Skills, Public Sector Transformation, and Citizen Engagement Should Include SMEs**

ACT supports the draft Strategy's emphasis on AI skills at every level, including the proposed expansion of AICC support for SMEs and the public sector Skills Academy. Many high-quality introductory AI courses are already available free of charge from industry and academic providers, as the draft Strategy notes, and partnerships with these providers can help the proposed public awareness campaign reach more people at lower cost. ACT also recommends that the testing environments and sandboxes the draft Strategy proposes be open to SMEs that supply or wish to supply the public sector, so that they can demonstrate their tools against real public sector needs.

The proposed pipeline of public sector use cases and clear measures of success will help suppliers understand what public bodies need. Early market engagement on these use cases, open to SMEs, would improve the quality of procurements and widen the pool of suppliers. ACT supports the proposed AI Citizens' Panel and AI Charter as tools for building public trust, and the Charter should be framed as a set of commitments by public bodies rather than as a source of new obligations on private firms.

## **IX. Conclusion**

ACT appreciates TEO's consideration of these comments and supports its goal of a public sector that adopts AI responsibly and confidently. A risk-based, technology-neutral approach that is aligned with the UK framework and open to SMEs will help Northern Ireland's public bodies and its growing AI sector realise the benefits the draft Strategy describes. We would welcome the opportunity to discuss these comments further.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Scarpelli', with a stylized flourish at the end.

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