**Checklist: Responsible AI Governance Essentials**

**Module 10D**

Quick checklist **before** starting or updating any AI project/policy.

**1) Identify & Classify AI Systems**

* ❏ Maintain a live **inventory** of all AI tools in use/planned.
* ❏ Determine **risk category** (incl. whether it is **high-risk** under the EU AI Act).
* ❏ If personal data is processed, list **data categories** (incl. special-category data) and map systems to **GDPR** requirements.

**Evidence to capture:** System inventory entry + risk tag; data categories list; link to risk register.

**2) Ensure Lawful Data Practices (GDPR)**

* ❏ Confirm **lawful basis** for each processing activity (e.g., consent, contract, legitimate interests).
* ❏ Run a **DPIA** where there is likely high risk to rights/freedoms (e.g., profiling, systematic monitoring).
* ❏ If using third-party data or pre-trained models, verify **licenses**, provenance, and **data sovereignty** constraints.

**Evidence to capture:** ROPA/DPIA record; lawful-basis memo; data/source licenses.

**3) Documentation & Transparency**

* ❏ Maintain up-to-date **technical/admin documentation** (design, data sources, intended purpose, performance limits).
* ❏ Prepare a plain-language **“What this AI does & why”** explainer for staff/parents/students.
* ❏ Implement **user-facing transparency** where required (tell people when they interact with AI or when AI informs a decision about them).

**Evidence to capture:** Model card / Instructions for Use; published transparency notice; version history.

**4) Human Oversight & Accountability**

* ❏ Define **who** is accountable for each AI system (owner, deputies).
* ❏ Set explicit **human-in-the-loop** checkpoints: when and how humans review, override, or escalate AI outputs.
* ❏ Train the overseeing staff; make the **override path** easy and documented.

**Evidence to capture:** Oversight SOP; RACI; training attendance log; sample override records.

**5) Bias & Fairness Checks**

* ❏ Test for **bias/unequal impact** using representative data and appropriate metrics.
* ❏ Document **mitigations** (data balancing, thresholds, policy constraints) if issues are found.
* ❏ Re-check after **model updates** or retraining.

**Evidence to capture:** Bias test report; mitigation notes; scheduled re-evaluation dates.

**6) Stakeholder Communication**

* ❏ Involve **DPO/legal** early; align with labor/education rules where relevant.
* ❏ If staff are affected (e.g., monitoring), engage **employee reps/unions** as required.
* ❏ Provide **feedback/appeal channels** (how to request human review; who to contact; response timelines).

**Evidence to capture:** Comms plan; FAQs/scripts; appeal workflow; contact mailbox/ticketing.

**7) Monitor Regulatory Updates & Best Practices**

* ❏ Track **new guidance/standards** (EU AI Act, codes of practice, national guidance).
* ❏ Schedule **regular reviews** of active systems against updated rules.
* ❏ Participate in **peer networks** to share lessons learned.

**Evidence to capture:** Update log; review outcomes & action items; links to guidance.

**Optional footer (for your file)**

* **Last review date:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_\_
* **Reviewed by (AIGO/DPO/IT):** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* **Next scheduled review:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_\_