

Make AI governable.

A 10-question test every Australian board should run before its next risk committee.

Three or more REDs is a board-level conversation, not an IT one.

MAPPED TO · AICD DIRECTOR-DUTY GUIDANCE · APRA CPS 230 · CPS 234 · AS ISO/IEC 42001

Q01

Do we know where AI is being used in our organisation today — including AI embedded inside third-party products and SaaS?

WHY IT MATTERS Shadow AI is the most common governance blind spot. Most boards cannot answer this.

Q02

Has one named person or body been made accountable to the board for AI risk, oversight and incident response?

WHY IT MATTERS Without a single accountable owner, AI risk defaults to technical teams and the board has no escalation path.

Q03

Does our risk appetite statement explicitly address AI risks — or is AI inheriting controls designed for traditional IT?

WHY IT MATTERS CPS 230 and ISO 42001 expect AI-specific risk management. Traditional controls do not cover drift, hallucination or autonomous decisioning.

Q04

For our highest-risk AI use cases, who has authority to stop the system on a Friday afternoon — and when was the rollback last tested?

WHY IT MATTERS Every production AI system needs a named owner, a documented kill-switch and a tested rollback. Most do not.

Q05

What is our policy on directors and the executive team using public generative AI tools for organisational work?

WHY IT MATTERS AICD has explicitly red-flagged public AI used on board papers. Most Australian organisations have no written policy.

Q06

How does our procurement framework assess AI risk embedded in vendor products, SaaS contracts and supply chain?

WHY IT MATTERS Most AI risk now enters through the supply chain — not in-house builds. Procurement was not designed to evaluate vendor AI.

Q07

What evidence do we have that the data feeding our AI systems is accurate, lawful, current and free of material bias?

WHY IT MATTERS AI inherits the quality of its inputs. Without documented lineage, every output is unprovable.

Q08

What AI training has the board itself received — and how recently?

WHY IT MATTERS AICD has tied director duties directly to AI literacy. A board that cannot interrogate an AI risk paper is an exposed board.

Q09

How is the use of AI to draft, summarise or analyse board papers, minutes and committee documents currently governed?

WHY IT MATTERS AICD's most recent publication flags AI-generated minutes as discoverable. Summaries of board packs risk legal privilege.

Q10

How would we explain — to a regulator or to a customer — a decision our AI system made yesterday?

WHY IT MATTERS The transparency test. Australian AI Ethics Principles, ISO 42001 and regulator expectations all assume you can answer this.

02

·

SCORING RUBRIC

Score yourself honestly.

A 30-minute working session with your chair, company secretary and one risk-committee member. *Score each question RED, AMBER or GREEN using the rubric below.*

#	RED	AMBER	GREEN
Q01	No AI inventory exists.	Inventory exists for internally-built AI only.	Live register covers built, procured, and embedded AI.
Q02	Accountability sits in IT or is undefined.	Named owner without formal charter or reporting line.	Charter, RACI and reporting cadence agreed at board level.
Q03	AI risk is not in the risk appetite statement.	AI captured under generic technology or cyber risk.	AI-specific appetite, controls and escalation thresholds.
Q04	No identified owner, no rollback plan.	Owner named, rollback documented but untested.	Both in place and tested in the last six months.
Q05	No policy, or informal "we don't allow it".	Generic acceptable use policy, not AI-specific.	AI-specific protocol with vetted tools and training.
Q06	No AI-specific clauses or vendor due diligence.	AI risk assessed for new vendors only.	AI risk built into onboarding and annual re-certification.
Q07	No data lineage tracking for AI inputs.	Lineage tracked for some systems but not consolidated.	Documented lineage and bias testing for material use cases.
Q08	None.	One-off briefing in the last 24 months.	Annual board AI training refreshed on regulatory change.
Q09	No policy. Ad-hoc use.	Topic discussed at board, no documented protocol.	Written protocol on AI use of board material.
Q10	We could not.	Partial logs but not consolidated or customer-facing.	Audit trail, explainability framework and remediation path.

3+ REDS	4+ AMBERS	Mostly GREEN
Material exposure under CPS 230 and AS ISO/IEC 42001. Time for a structured assessment.	Foundational work in place but un-validated. Pressure-test before regulators do.	Ahead of the AU mid-market. Focus on board-level AI use and director literacy.