

5 Phase Roadmap for AI Governance : *From Policy To Practice.*

A structured roadmap for building AI governance from the ground up.

Grounded in NIST AI RMF, EU AI Act, and ISO 42001.

For AIGP candidates, compliance leads, DPOs & risk managers.

1. Foundation

2. Risk

3. Implementation

4. Monitoring

5. Audit

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Three ways governance *programmes die.*

1 Produce a policy but fail to operationalise it

2 Build a risk framework but lack the data to populate it

3 Complete an assessment but have no mechanism to act on findings

Same root cause every time:

Governance was designed as a document exercise — not an operational system.



01

Foundation

Establish accountability & policy

- 1 Appoint an AI governance lead or committee with clear accountability
- 2 Define your AI Acceptable Use Policy: what is permitted, prohibited, and who approves exceptions
- 3 Create an AI inventory — a register of ALL AI systems in use or development, including third-party tools
- 4 Map roles under applicable regulations (provider, deployer, distributor under EU AI Act)
- 5 Establish a governance review cadence: quarterly minimum



02

Risk Assessment

Classify & prioritise by risk

1

Classify each AI system: Unacceptable(prohibited), High-risk, Limited risk, or minimal risk

2

Conduct an AI Impact Assessment (AIA) for high-risk systems

3

Complete DPIAs for systems processing personal data at scale

4

Document identified risks in a risk register with likelihood, severity, and ownership

5

Prioritise remediation based on residual risk, not inherent risk alone



03

Implementation

Operationalise controls across lifecycle

1

Apply NIST AI RMF Govern and Manage functions to embed controls in development workflows

2

Implement human oversight mechanisms for high-risk systems

3

Define incident response procedures for AI failures or unexpected outputs

4

Establish data governance: training data provenance, quality checks, and retention

5

Document technical documentation requirements per EU AI Act Article 11



04

Monitoring

Track performance, drift & compliance

- 1 Define key performance indicators for each high-risk AI system
- 2 Monitor for model drift: degradation in accuracy or fairness over time
- 3 Track bias indicators across demographic groups where relevant
- 4 Log incidents, near-misses, and user complaints in a structured format
- 5 Report to the governance committee on a defined schedule



Audit & Improvement

Test, verify & iterate

- 1 Conduct internal audits of high-risk systems against documented controls
- 2 Commission third-party conformity assessments where required by regulation
- 3 Review and update risk assessments after significant model changes
- 4 Feed audit findings back into Phase 1 policy review
- 5 Build a culture of accountability: governance fails when treated as a compliance checkbox

One Roadmap. Three Frameworks.

Perspective	NIST AI RMF (Risk governance)	EU AI Act (Regulatory compliance)	ISO 42001 (Operational management)
Governance (cross-cutting)	Govern (continuous)	Roles, obligations (providers/deployers)	Context, Leadership
Risk Identification	Map	Risk classification	Planning (risk & impact assessment)
Risk Analysis	Map	Risk management system, testing, documentation	Risk assessment + evaluation
Risk Treatment	Manage	Technical controls, human oversight, docs	Operation (controls, Annex A)
Monitoring	Measure (ongoing)	Post-market monitoring	Performance evaluation
Assurance	Govern / Manage (review)	Conformity assessment	Internal audit
Continuous Improvement	Iterative loop	Implicit via compliance updates	Improvement (Clause 10)



Five Ways Governance Fails

X

Starting with a policy document instead of an inventory — you cannot govern what you have not identified

X

Treating risk classification as a one-time exercise — AI systems evolve, and so must their risk tier

X

Assigning governance to a single team with no executive sponsorship — governance without authority can't enforce controls

X

Conflating compliance with governance — compliance is the legal minimum, governance is what makes AI trustworthy

X

Skipping decommissioning — retired AI systems without proper data disposal create long-tail risk



Governance is not a policy. *It's an operational system.*

Repeatable processes. Accountable roles. Feedback loops.

That's what keeps AI systems aligned with your values
and your regulatory requirements — over time.

NIST AI RMF

EU AI Act


ISO 42001



SAVE THIS ROADMAP

5 phases. 3 frameworks. One path from policy to practice.



Repost ·  Which phase does your org get stuck at?

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