



01 April 2026

Lord Alton of Liverpool
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Dear Lord Alton,

JCHR Session Follow-Up

It was a pleasure to attend the recent Joint Committee on Human Rights session on the regulation of AI. I am grateful for the opportunity to respond to the Committee's questions and to set out further detail on the Government's approach.

Regulatory framework

1. *Which UK regulators can block AI systems from being deployed if significant upstream risks are identified?*
 - a. *What legal powers does the AISI have to prevent AI systems from being released, or require improvements, if weaknesses or risks are identified?*

The impact and risks of AI models are radically different depending on the applications they are used for. The UK's expert regulators are addressing risks emerging from AI systems being utilised in their sectors. Regulators' powers vary, for example:

- Under the Online Safety Act, in-scope AI services are required to assess the risk of harm to users from illegal content on their services and implement measures to manage and mitigate this risk. Where services are likely to be accessed by children, they are required to take action to protect them from harmful content. Ofcom, as the regulator of the OSA, can levy serious fines (up to 10% of qualifying worldwide turnover) or impose business restriction measures on services which do not comply.
- The MHRA holds powers under the Medicines and Medical Devices Act in respect of medical devices to issue suspension and safety notices, which include the power to prohibit the supply of a medical device to protect health or safety.
- The Bank (including the PRA) has various powers that can be deployed to mitigate the risks posed to the firms and FMIs it regulates, provided the Bank or PRA's statutory objectives, as relevant, are engaged. In particular, it has (a) powers under Chapter 3C of Part 18 of FSMA regarding Critical Third Parties (CTP) (if a third-party provider is designated by HMT as a CTP); and (b) powers to require the firms and FMIs it regulates to take certain actions to reduce the risks posed by such providers, either (i) on a case-by-case basis through imposing a requirement or giving a direction to such firms or FMIs under FSMA (e.g. 55M, 55L) or the Banking Act (e.g. s.191); or (ii) more generally through the Bank's rule-making and

Code of Practice powers e.g. our rules on Operational Resilience, Outsourcing and Governance. The use of these powers is subject to specific procedural safeguards.

- Under the Gas Act 1986 and Electricity Acts 1989, Ofgem can issue orders to compel regulated parties to rectify breaches of their licence conditions and certain other regulatory requirements, including provisional orders to address urgent issues. If the use of AI, or any other technology, by a regulated party, was contributing to a licence breach then an order could compel them to stop using it until the issues are fixed if that step is appropriate and necessary to secure compliance. The equivalent power under the Network and Information Systems Regulations 2018 is to issue an enforcement notice.

The AI Security Institute's close collaboration with top AI developers on advanced AI capabilities is critical to ensuring we can prepare for AI's future. However, the Institute is not a regulator and has no statutory approval role. Its job is to test, probe and understand AI capabilities, identify vulnerabilities, and collaborate with industry to strengthen model safeguards.

The Institute works with these developers to test models, strengthen security, share best practice, and encourage all developers to be clear about the measures they have in place.

The Institute's close collaboration with industry leaders enables information-sharing to mitigate AI risks. The Institute's testing has led to leading labs (including OpenAI and Anthropic) addressing dozens of AI model vulnerabilities prior to release.

2. *What assessment has the UK made of the costs and benefits of an independent oversight body with a regulatory function dedicated to AI?*

The Government keeps the regulatory landscape under regular review. Should new regulatory requirements for AI be introduced, careful consideration would be given to all appropriate options for oversight and enforcement, including the most suitable bodies to undertake any such functions.

3. *Government committed to engage with regulators under the AI Opportunities Action Plan to assess regulatory capacity to address AI risks: "[Recommendation 25](#): Ahead of the Spending Review 2025, each sponsor department will liaise with their regulator to identify the future capability needs for their regulators, taking into account existing funding models, and how they intend to mitigate AI risks and drive growth, which DSIT, with HMT support, will assess." Has this engagement happened? If so, what was the outcome of these discussions and the assessment from DSIT?*

Regulators received funding through the Spending Review 2025 to scale and integrate AI within regulator activities. In areas with strong potential for AI-driven growth and efficiencies, the government has taken further action.

The AI Capability fund, delivered by the Regulatory Innovation Office in September 2025, awarded £3.6 million to eight regulator-led projects to develop regulatory capability in AI, and to regulate the applications of AI. Seven projects will conclude by March 2026, with the final project completing in October 2026. These include Ofgem's development of an AI tool to accelerate clean energy infrastructure approvals, the Civil Aviation Authority's use of AI to analyse air accident reports and speed up drone adoption, and the Office for Nuclear Regulation's support in the nuclear industry for safe, efficient AI use in managing high-risk nuclear waste. Early results include regulatory changes

enabling faster drone delivery of urgent blood samples between Guy's and St Thomas' hospitals, reducing journey times from 30 minutes by road to under 2 minutes by air.

In October 2025, the government announced the fourth wave of the Regulators' Pioneer Fund (£8.9 million) projects, supporting regulators and local authorities to trial smarter, more adaptive regulatory approaches. This initiative helps innovative technologies — such as AI in healthcare, autonomous vehicles, and engineered biology — reach the market faster. For instance, the fund provided £1 million to the MHRA to pilot AI-assisted tools to support experts in scientific advice, clinical trial assessments, and licensing to improve efficiency and consistency.

Procurement

4. *Has there been any assessment of how well standardised approaches to tech procurement protect human rights, and how effective the enforcement of the clauses and commitments in standardised approaches is?*
 - a. *Please could you share further information on the development and content of standardised contracts and provide a copy of a typical contract?*

DSIT has not undertaken a single, standalone assessment of how standardised technology procurement approaches protect human rights or the effectiveness of enforcement of individual contractual clauses. Instead, human-rights-related risks are addressed through established cross-government procurement policy requirements and standard contractual terms, applied consistently across the commercial lifecycle. This includes mandatory Modern Slavery Risk Assessments and ongoing risk review in line with Cabinet Office Procurement Policy Notes on tackling modern slavery in government supply chains, including PPN 02/23 and its successor PPN 009, rather than through discrete contract-specific evaluations.

Standardised technology contracts used by DSIT are developed and maintained centrally by the Cabinet Office and the Government Legal Department to ensure consistency with legislation and procurement policy. Depending on the route to market, DSIT typically uses either Crown Commercial Service framework call-off terms or the Government Standard Contracts for Procurement, such as the Model Services Contract, Mid-Tier Contract or Short Form Contract. These represent the typical contractual forms used for technology procurements across central government and are publicly available at: <https://www.gov.uk/government/collections/government-standard-contracts-for-procurement>

Data and transparency

5. *How will the National Data Library be developed to ensure that bias within national datasets does not translate into discriminatory outputs, beyond providing [voluntary guidance](#)?*

The National Data Library is being designed with fairness and responsible data use as core principles. Further details on the National Data Library will be set out in Spring 2026.

6. *When automated decision making is used, there are four safeguards which must be in place, including the right to meaningful information and the right to contest the output. In practice, how is the provision of these safeguards monitored?*

In the UK's general data processing regime, Articles 22A-C UK GDPR set out the rules relating to decisions based solely on automated processing of personal data that have legal or similarly significant effects on individuals. When organisations make decisions of this nature, they must put in place the relevant safeguards: they must inform individuals of the significant decisions taken about them and ensure they can challenge such decisions, obtain human intervention for them, and make representations about them.

The Information Commissioner's Office (ICO) is an independent regulator and a DSIT public body, and it is responsible for monitoring and enforcing the application of data protection legislation in the UK.

Where an individual believes that a controller has failed to comply with data protection legislation, they can bring a complaint to the ICO. The ICO takes a risk-based, effective, proportionate approach to enforcement. It investigates individual complaints and has the authority to issue enforcement notices, requires a person to attend an interview and answer questions, conducts an audit of premises and issue warnings, as well as impose penalties on organisations that fail to comply with these safeguards. Individuals can also make a court claim to obtain compensation if they believe their rights under data protection law have been breached, and they have suffered material or non-material damage as a result.

Additionally, the ICO will be launching its consultation on automated decision-making and profiling guidance shortly to update its existing guidance in light of the reforms in the DUAA, which received Royal Assent in June 2025. This consultation will give the ICO the opportunity to gather and consider a wide range of views and evidence on how the safeguards are applied in practice, and how it can shape its guidance and other activities to help organisations comply with their obligations under Articles 22A-C.

The government is also committed to monitoring the impact of the reforms in the DUAA on individuals and organisations alike through engagement with emerging evidence and stakeholders.

7. *How is the Algorithmic Transparency Reporting Standard list monitored for compliance? For example, are the records placed in the repository regularly reviewed to identify concerns which can then followed up through auditing or other investigation, and if so by whom?*

The Algorithmic Transparency Recording Standard (ATRS) establishes a standardised way for public sector organisations to publish information about how and why they are using algorithmic tools.

It is mandatory for central government and Arms-Length Bodies which provide public or frontline services or routinely interact with the general public. Full guidance on the ATRS is available on GOV.UK (Algorithmic Transparency Recording Standard - guidance for public sector bodies). Compliance with the mandatory requirement is managed by the Responsible Data and AI team. As stated in the guidance, if an organization is within the mandatory scope of the ATRS policy, it has a single point of contact (SPOC) whose role is to coordinate with the ATRS team on identifying in-scope algorithmic tools and drafting and publishing records.

The ATRS is designed as a transparency and communication standard, not an assurance or audit mechanism. ATRS records are reviewed for quality and readability by DSIT as part of the internal clearance and publication processes, but accountability for tools sits with the organisation that owns them. Section 6 of the ATRS guidance (Owner and Responsibility) explains that each record has a named SRO for a tool, which is the role which is ultimately accountable for the tool in an operational context. This may be the policy or service owner, for example. Once uploaded on the repository, keeping records up to date is the responsibility of the tool owner/SRO. The ATRS guidance on GOV.UK sets out the steps to be taken in the event of any details or information about a tool changing.

EU AI Act

8. *The Committee has heard that it could benefit British businesses for the UK to align with the EU AI Act, given that UK companies operating in the EU will be complying with it anyway. What assessment has government made of the commercial benefits and disadvantages of aligning?*

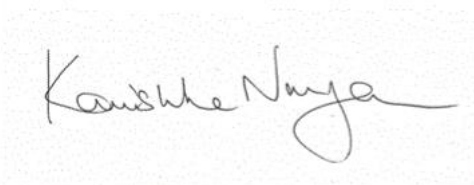
The EU has introduced comprehensive AI regulation that categorises AI systems by risk, targeting a wide range of actors and uses of AI. We are committed to working closely with the EU on AI as we develop our own approach.

The UK is committed to proportionate AI regulation which is grounded in evidence and supports growth and innovation. Most AI systems in the UK are already regulated at the point of use by our existing expert regulators. This is both through sector-specific regulations such as medicines regulation, and cross-cutting legal safeguards including data protection, competition, product safety, and equalities laws.

The EU has notified the UK of its intent to add the EU AI Act to Northern Ireland, through Article 13(4) of the Windsor Framework. Substantive provisions of the EU AI Act do not apply in Northern Ireland and would only apply following an agreement at the Withdrawal Agreement Joint Committee, which will be subject to the mechanisms in Schedule 6B to the Northern Ireland Act 1998. The UK Government is assessing the proposal and will continue to engage closely with the EU on this.

I hope this response is helpful to the Committee. The Government remains committed to ongoing engagement with Parliament as our approach to AI governance continues to develop.

Yours sincerely,



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Department for Science, Innovation & Technology