AI in the workplace

Businesses grapple with AI governance.

DPN AI Survey Report

Publication date: September 2024

DPN
DATA PROTECTION NETWORK

AI governance is in its infancy amongst UK businesses. Limited training and guidance is being given to staff about acceptable use of AI tools. Many organisations have yet to formalise who internally should be responsible for managing responsible AI use and its potential risks. Most agree though this needs cross-departmental input.

DPOs and those who work in data protection related roles are somewhat positive about the benefits of AI, but have a range of concerns, which are not solely data protection related. Many believe employees are using AI tools for work purposes without telling anyone.
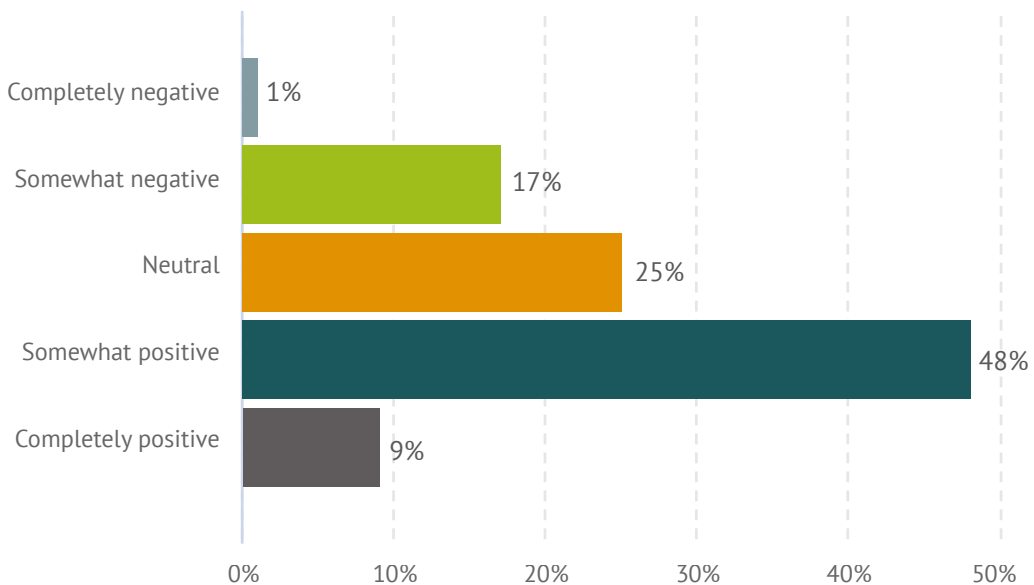
These are just some of the findings of our 2024 AI in the Workplace survey, which was completed by people working in organisations of all shapes and sizes.

The majority of respondents work as DPOs or in data protection or privacy teams. Our findings focus on those who work in roles with some level of responsibility for managing or governing AI use.

57% of DPOs are generally positive about AI use in the workplace

In the main, DPOs and those who work in data protection related roles have a positive attitude towards AI use, but a significant minority have negative feelings.

What are your feelings towards AI use in the workplace?

| Feeling	Percentage
Completely negative	1%
Somewhat negative	17%
Neutral	25%
Somewhat positive	48%
Completely positive	9%

Limited AI training

While our survey reveals DPOs and those working in data protection roles are expected to have some responsibility for managing/governing AI use within their organisations, 60% have not been given any form of AI training.

Has your organisation given you any AI training?

Yes
14%

In part
26%

No
60%
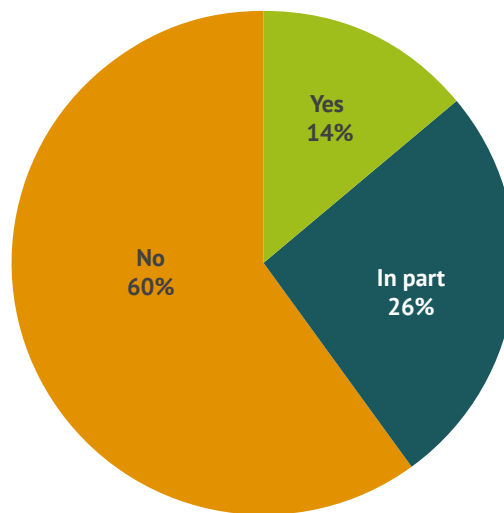
55% of organisations don't have AI policies/guidelines

Our survey reveals more than half of organisations do not have AI related policies or guidelines for their staff. Encouragingly 40% say they are planning to.

The Dutch Data Protection Authority (Autoriteit Persoonsgegevens, AP) has seen an increase in reports of data breaches caused by the use of AI tools in the workplace such as ChatGPT and Copilot. It is urging organisations to put policies in place to mitigate the risk of data breaches. This won't be an issue unique to the Netherlands. And the risks are broader than just data protection.

> **It's likely many employees are using AI tools unaware of the risks and with very limited organisational measures and controls in place to mitigate these risks.**

94% have concerns about AI use in the workplace

The vast majority of DPOs and those who work in data protection related roles have concerns about AI use.

Do you have any concerns about the use of AI in the workplace?

Yes	62%
In part	32%
No	4%
Not sure	2%
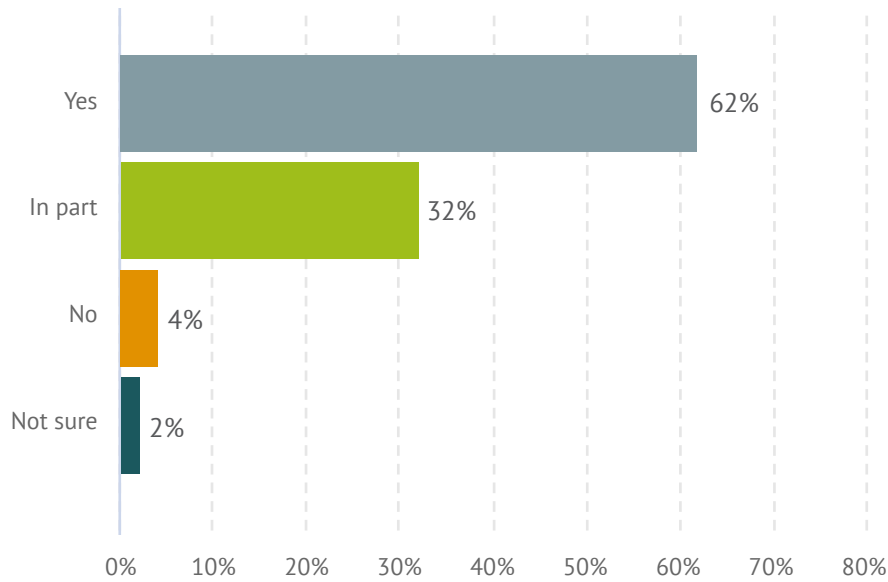
Unsurprisingly the primary concern of DPOs and those working privacy teams is data protection (98%). Many are also mindful of information security risks (88%), commercial risks (72%) and commercial risks (65%).

Survey respondents shared a range of other concerns, these reveal limited trust in AI models and providers.

lack of trust in AI models   *lack of trust in AI suppliers*

biased outputs   *staff not even knowing they are using AI*

inability to comply with UK GDPR principles

severe lack of understanding and knowledge among senior leaders and directors

people wanting to use AI without understanding the implications

*data ethics*   *copyright infringement*   *lack of governance*

Half responders say AI governance in their organisation is 'in its infancy'

Businesses have become familiar with setting up frameworks for data/information governance, meanwhile AI governance is the new kid on the block. Businesses' approach to AI governance is described by 50% of DPOs as being 'in its infancy'.

However, it's good to see 35% have done some work on AI governance and describe it as 'developing'. Just 12% say it's 'non-existent.'

How would you describe your organisations approach to AI governance?
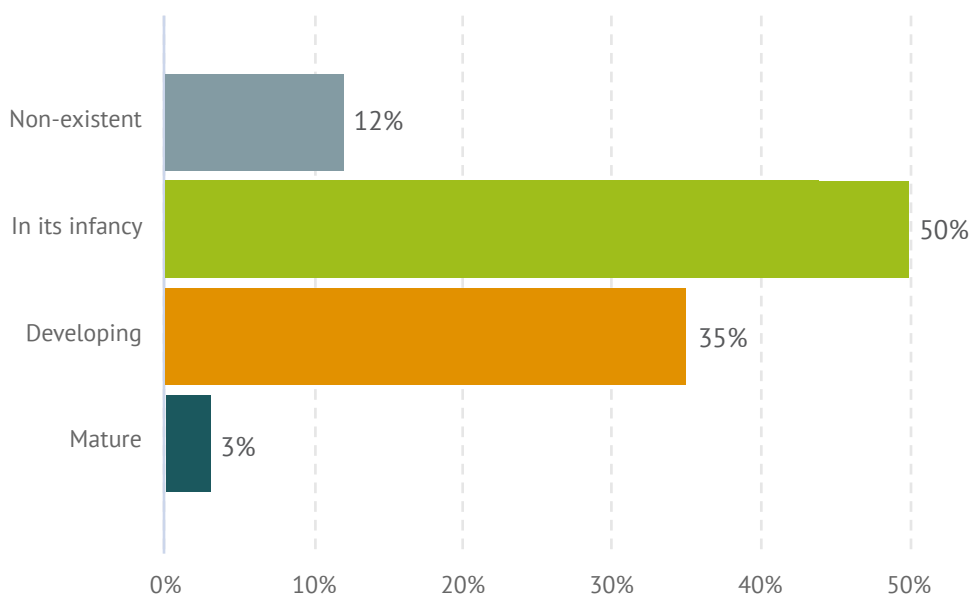
Businesses are often unsure who should be responsible for AI governance

Only a fifth of organisations have fully assigned responsibilities for AI governance. Many are still grappling with where responsibility for governing AI use and assessing AI risks should sit within their operations. Of those which have allocated AI governance responsibilities (either fully or in part), most are taking a cross-departmental approach.

Two-thirds of DPOs and those who work in data protection related roles say AI governance is broader than data protection, and responsibility for governing its use should only in part rest with them.

The following types of roles, teams and internal working groups are commonly being considered or selected as having some responsibility for managing AI use in the workplace.

- Data Protection Officer / Data Privacy Team
- Chief Technical Officer
- Chief Digital Officer
- IT
- HR/People Services
- Risk
- Compliance

- Data Governance
- Information Governance
- Legal
- Information Security
- Business Intelligence
- Data Analytics

Our survey indicates the most common combination of roles for AI governance is Compliance, Data Protection, Information Governance and/or Information Security.
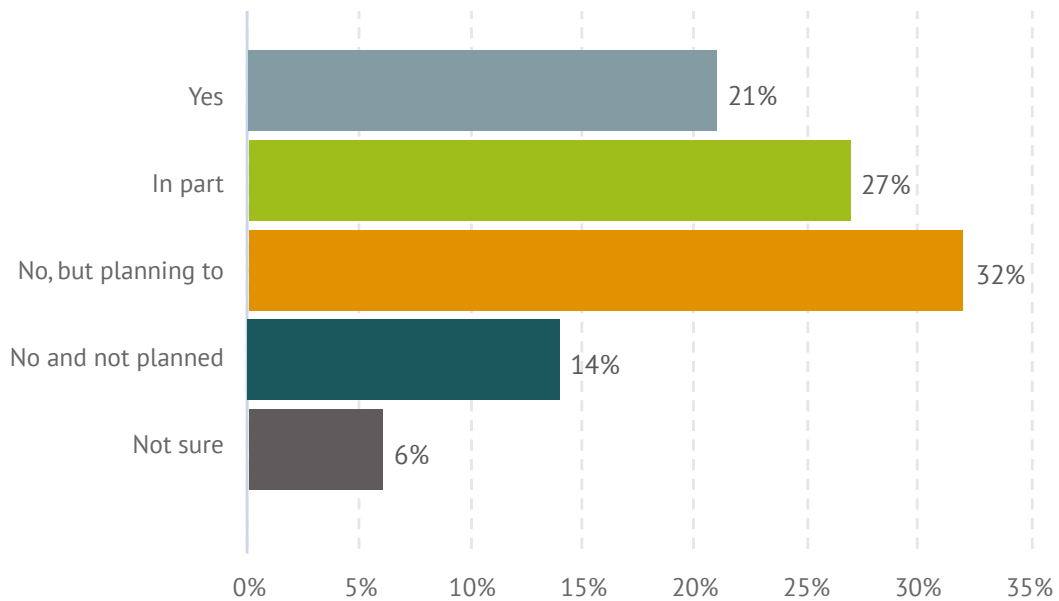
Limited use of AI risk assessments

AI risk assessments are a key requirement in some jurisdictions. It is also a requirement under GDPR/EU GDPR to conduct a Data Protection Impact Assessment when using personal data in a new and innovative ways, i.e. using AI.

It's concerning 50% of DPOs and those in data protection related roles say the risks posed by AI in the workplace have not been assessed, or they're unsure if any form of risk assessment has been undertaken.

Has your organisation conducted any form of risk assessment about the use of generative AI, or other forms of AI?

Response	Percentage
Yes	21%
In part	27%
No, but planning to	32%
No and not planned	14%
Not sure	6%

Organisations are more likely to focus their AI risk assessments on in-house AI use than its use in their supply chains.

> **Less than 40% of organisations have conducted any form of risk assessment of relevant suppliers. This reveals limited oversight of AI in the supply chain.**

Employers often not aware of employee AI use

Only a fifth of DPOs and those in data protection related roles are confident staff are letting their organisation know they're using AI tools for work purposes.

**Do you believe staff are using AI tools without the organisation's knowledge
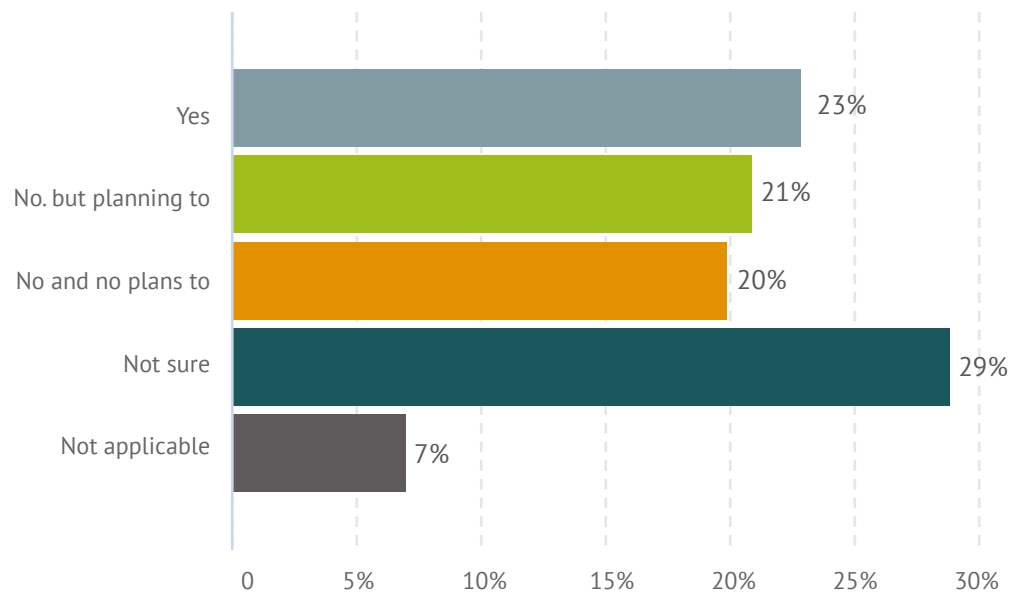(e.g. bringing their own AI tools into the workplace)?**
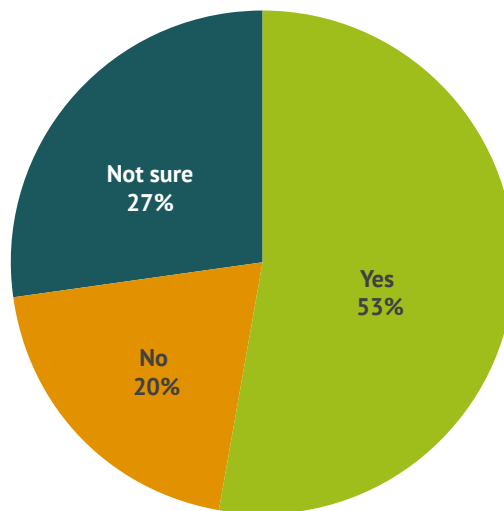
This reveals limited oversight of the AI tools employees are using, what purposes they're using them for and the potential risks.

Preparedness and attitudes to AI regulation

Organisations seem ill-prepared for the EU AI Act. Only 7% of respondents said the EU AI Act was not applicable to their organisation, yet less than a quarter have taken steps to prepare for its requirements.

Is your organisation taking steps to prepare for AI laws, such as the EU AI Act?

Category	Percentage
Yes	23%
No, but planning to	21%
No and no plans to	20%
Not sure	29%
Not applicable	7%

Interestingly, 80% of DPOs or those who work in data protection related roles believe the UK should introduce an AI regulation.

How businesses can get on the front foot

While governments and regulators across the globe seek to find a balance between supporting innovation while mitigating the risks AI poses, our survey shows many organisations are still trying to find their feet, or AI governance is not on their radar at all.

It's evident AI use in the workplace can be a force for good – streamlining processes, automating repetitive tasks and helping employees to do their jobs 'better' and more effectively, but a lack of awareness, training and guidance means a range of risks may be overlooked.

Following an investigation into Snap Inc, the UK's Information Commissioner's Office (ICO) has warned all organisations developing or using generative AI to consider risks from the outset, before bringing products to market or using them.

We'd urge organisations who haven't done so already to decide internally who would be best placed to be responsible for AI governance, and would agree a cross-departmental is ideal. Managing AI use is only in part a data protection and privacy issue.

Once responsibility has been assigned a robust approach can be developed for raising awareness, making sure appropriate training is provided to those who need it and clear policies/guidelines are in place to set out expectations and standards for staff.

It's worth noting a Data Protection Impact Assessment is mandatory under GDPR/UK GDPR for processing which is likely to result in a 'high risk'. This would extend to any suppliers used, providing AI solutions or using AI.

The ICO has published a list of processing operations which require a DPIA to be conducted. This includes '**Innovative technology: processing involving the use of innovative technologies, or the novel application of existing technologies (including AI)'**, when this processing is combined with any of the following criteria:

- Evaluation or scoring.
- Automated decision-making with legal or similar significant effect.
- Systematic monitoring.
- Sensitive data or data of a highly personal nature.
- Data processed on a large scale.
- Matching or combining datasets.
- Data concerning vulnerable data subjects.
- Innovative use or applying new technological or organisational solutions.
- Preventing data subjects from exercising a right or using a service or contract.

But as said, data protection is just one of many areas to consider.

Quick AI Checklist

✓ Appoint AI governance roles

✓ Create AI policy & guidance

✓ Find out what AI tools your employees are using and for what purposes

✓ Provide useful AI training relevant to your business

✓ Make sure you're well prepared for regulation (e.g. EU AI Act)

✓ Carry out relevant assessments of AI use

About DPN

Founded in 2014 we regularly publish news, insight and guides. Our experienced team work across a range of sectors providing tailored data protection training, data protection gap analysis reviews and helpdesk support.
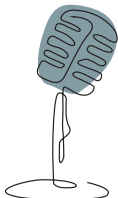
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