



**To:** John Brinsley-Pirie  
**From:** Paula Knaap, Deputy Chief Executive, Organisational Enablement  
**Date:** 13 June 2025  
**Subject:** Use of Artificial Intelligence (AI) in the Ministry's Work<sup>1</sup>

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### Summary

This memo outlines how the Ministry is using AI to improve how we work, aligned with government guidance and best practices.

### Our Approach

We're using AI to make our work more efficient, innovative, and informed. Our approach follows the Government Chief Digital Officer's AI Framework and the Minister for Digitising Government's guidance on safe AI use in the public sector.

We're building digital skills across the Ministry so staff can use AI tools confidently and responsibly in their daily work.

### What We've Done So Far

We've created internal AI Policy and Guidelines (see **Appendix A**) to support safe and effective use of AI. These are designed to encourage innovation while managing risks.

We're already using AI tools for tasks like:

- Reviewing and summarising documents
- Analysing research
- Transcribing internal videos
- Comparing documents

We're also trialing KymCompliance, an AI tool that helps manage regulatory information more efficiently.

We're working with partners like Deloitte and Microsoft NZ to access expert advice and tools.

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<sup>1</sup> This document was prepared with the use of AI

## What's Next

We've identified key areas for future AI use, including:

- Automating the Red Tape Portal and Regulatory Reviews
- Using Microsoft Copilot across the Ministry for research and data analysis
- Exploring AI for ministerial servicing, regulatory assessments, and early engagement processes

## Building Capability

We're growing our internal digital skills and have set up an AI Community of Practice to support learning and experimentation. We're also working with other agencies to share knowledge and align our approaches.

## Recommendations

We recommend that you:

1. **note** the Ministry's intent to maximise the potential benefits from AI adoption and its progress to date in its AI enablement
2. **discuss** your feedback with Ministry officials

Carol Abernethy

Carol Abernethy  
Head of Digital and Insights  
**Ministry for Regulation**

Date: 13 June 2025

Paula Knapp

Paula Knapp  
Deputy Chief Executive, Organisational  
Enablement  
**Ministry for Regulation**

Date: 13 June 2025





**Ministry for Regulation**  
**Te Manatū Waeture**

## Internal policy | Artificial Intelligence

|              |                                   |                  |                           |
|--------------|-----------------------------------|------------------|---------------------------|
| Version      | 1.0                               | Contact          | Digital and Insights Team |
| Policy Owner | DCE, Organisational Enablement    | Approved         | 29th April 2025           |
| SharePoint   | <a href="#">Internal policies</a> | Due for Revision | April 2026                |

### Context

The Ministry for Regulation (MfR) acknowledges the transformative potential of Artificial Intelligence (AI) in enhancing our operations, boosting efficiency, fostering innovation, and elevating the quality of advice we provide.

We are enthusiastic about embracing these technologies to unlock new opportunities and drive positive change. At the same time, we recognise the inherent risks associated with AI.

This policy is designed to empower MfR staff to responsibly adopt and maximise the benefits of AI, while ensuring its use aligns with principles of safety, transparency, and ethics, and upholds the Ministry's Social License to Operate.

## Scope

This policy applies to all MfR **staff** (permanent employees, fixed term employees, secondees, consultants and contractors) at the Ministry for Regulation (**the Ministry** or **we/our**) when using artificial intelligence (AI) to create or process information for the Ministry.

AI is a broad discipline with multiple branches, all focused on creating machines capable of augmenting human intelligence. AI includes Machine Learning (ML), Generative AI (GenAI), Large Language Models (LLM) and Generative Pretrained Transformers (GPT).

The primary focus of ML is to enable machines to learn from past data, improve their performance, and make decisions without explicit coding. Google's search algorithm is an example of ML in its use of past data to refine search results. ML also represents an example of 'narrow AI' which focuses on specific tasks.

GenAI and its subsequent forms, LLM and GPT can process inputs to generate and construct new data. These fall under the category of '**General AI Systems**' which can understand, learn and apply knowledge in multiple domains and can solve problems using machine equivalents of human reasoning, 'common sense', abstract/contextual understanding.

This policy therefore applies to the use and application of all 'General AI Systems' such as Copilot, ChatGPT, Open AI, Gemini, DALL-E and Claude, herein referred to as an AI system.

This policy is also to be considered in conjunction with:

- the requirements of the information and records policy [Internal policy | Information and Records Management Policy](#)
- the requirement for acceptable use by staff of Ministry information systems in the acceptable use policy [Internal policy | Acceptable Use Policy](#);
- the information security requirements in the protective security policy [Internal policy | Protective Security](#);
- privacy protection in the privacy policy [Internal policy | Privacy](#).

## Principles

### Background

With the recent increase in the availability and potential of AI to transform how our business can interact, engage and operate, the Ministry has opportunities to boost productivity, augment staff capabilities, improve the quality of Ministry advice, and to more efficiently and effectively deliver Ministry goals.

As AI systems continue to evolve, developing greater predictive capabilities, there is a need to ensure that AI is utilised in a safe, transparent, ethical, and just way that reflects the Ministry's Social License to Operate (SLO).

There are however risks associated with AI usage which need to be managed to support and empower Ministry for Regulation ('the Ministry') staff to innovate, safely adopt, and derive benefits from using AI systems, including:

- Ensuring Ministry staff act in responsible ways that align with the Ministry's existing policies by setting clear expectations for the use of AI systems,
- Continuing to safeguard the confidentiality, integrity and availability of its information,
- Maintaining the privacy of personal information it holds,
- Ensuring the Ministry retains ownership of and responsibility for its advice,

- Ensuring usage is aligned to the government's Māori Data Governance model: [Co-designing Māori data governance - data.govt.nz](#) and
- Ensuring AI results and recommendations are subject to oversight by accountable staff with appropriate authority and capability at every stage.

As per the NZ Information Security Manual (NZISM), the Ministry's Chief Information Security Officer (CISO) is responsible for setting the strategic direction for information security within the Ministry. While some public sector agencies have opted to ban the use of AI systems, the Ministry in consultation with our CISO, has endorsed the use of authorised AI systems on Ministry devices. This is so we don't create stigma or fear in a technology area that is continually evolving.

## Principles

The public service System Lead for AI is the Government Chief Digital Officer (GCDO). The Office of the GCDO provides a Public Service AI Framework and guidance for the public service at this link: [Public Service AI Framework | NZ Digital government](#)

The OECD's values-based AI principles inform the principles of the Public Service AI Framework:

### Inclusive, sustainable development

Public Service AI systems should contribute to inclusive growth and sustainable development through a focus on innovation, efficiency and resilience, and on reducing economic, social, gender and other inequalities and protecting natural environments. AI use should consider and address concerns about unequal access to technology.

### Human-centred values

Public Service AI use should respect the rule of law, democratic values and human rights and labour rights through the lifecycle of each AI system or product. These rights and laws include personal data protection and privacy, dignity, non-discrimination and equality, self-determination and autonomy. Public service workers have the right to be consulted on changes made to their work and working arrangements. Agencies need to provide human oversight throughout the AI lifecycle to ensure ethical and appropriate use.

### **Transparency and explainability**

The Public Service needs to commit to transparency in its use of AI. People interacting with government AI systems or receiving AI-assisted services should be aware of and understand how AI is being used. To support this, agencies should publicly disclose when AI systems are used, how they were developed and how they affect outcomes — as relevant and appropriate according to the given use case. Agencies should also enable people affected by the outcome of an AI system to understand how the outcome was determined.

### **Safety and security**

Public Service AI systems should treat the security of customers and staff as a core business requirement, not just a technical feature (security-by-design). They should minimise risk to individual or national safety and security under normal use, misuse or adverse conditions. The Public Service should ensure traceability of data, apply a robust risk management approach and work collaboratively with commercial and security colleagues in the procurement and assurance of AI tools.

### **Accountability**

AI use within the Public Service should be subject to oversight by accountable humans with appropriate authority and capability at every stage. This should include the application of relevant regulatory and governance frameworks, reporting, auditing and/or independent reviews.

Agency AI capabilities need to keep pace with technological changes, to maintain a strong understanding of AI systems and their limitations.



The Ministry commits to regularly reviewing, refreshing, and re-publishing these guidelines to reflect updated guidance from the Office of the GCDO, updated Ministry policy advice, developments in technology, opportunities and risks.

## Implementing this policy

The following expectations are aligned to the Ministry's [Internal policy | Information and Records Management Policy](#), [Internal policy | Protective Security](#), [Internal policy | Privacy](#) and [Internal policy | Acceptable Use Policy](#) policies.

Provided Ministry staff comply with these guidelines, the risks are acceptable when compared to the benefits that are likely to be gained from responsible use of AI systems.

- 1. Use of Ministry devices:** For work purposes, a Ministry-managed device must be used to access only AI systems on the Ministry's Allowlist. Note that the Ministry already blocks access via its IT security firewall to some AI systems (eg DeepSeek) until the completion of a satisfactory cyber security, information and privacy risk assessment.
- 2. Classified information:** Official Ministry information, classified, personal or other information that would not normally be publicly available must not be 'fed into', submitted, or provided to, any AI system except for Microsoft Copilot because it operates within the Ministry's protected M365 tenancy. Staff must apply the same security best practices used for all Ministry information and data.
- 3. Registration:** The Ministry's staff email address must be used when using AI systems for Ministry business purposes. This enables the Ministry to understand system performance, usage, associated costs and respond

to requests for information on Ministry AI usage or any investigative needs.

4. **Protect Māori data sovereignty:** The Ministry has an expectation to act in accordance with Te Tiriti o Waitangi principles. The input and/or production of data and information pertaining to Māori people, language, culture, resources or environments must be done in accordance with the government's Māori Data Governance model and consultation with, or under the advisement of, established Te Tiriti partners to understand and actively manage the impacts of AI for Māori. Ministry staff should be aware that current AI systems may have omissions in authentically representing indigenous cultures. Ministry staff must consult with the Digital and Insights team on appropriate protocols.
5. **Information breach:** Any information breach (or concern that such has occurred) must be reported immediately, in accordance with the Ministry's [Internal policy](#) | [Protective Security](#).
6. **Decision making:** An AI system must not be empowered to make a business decision.
7. **Use good judgement and validate outputs:** Ministry staff must judge whether the use of an AI system is appropriate, and appropriately scrutinise, validate, and verify any output from an AI system to be used by the Ministry.
8. **Disclosure:** If an AI system has been used to produce a document, then the contribution from the AI system must be disclosed within the document as an integral part of that document's provenance. Identify AI generated text in a footnote in formal documents.
9. **Compliance with security policies:** When using AI systems, Ministry staff must use the same security practices used for all Ministry information. This includes using strong passwords, keeping software up-to-date, and

following the Ministry's [Internal policy | Protective Security](#), [Internal policy | Information and Records Management Policy](#) and [Internal policy | Privacy](#) policies.

10. **Ethical considerations:** In addition to the statements above, use of AI systems must align with the Algorithm charter for Aotearoa New Zealand [Charter](#) and be transparent. Ethics and human rights must be considered.

11. **Ministry staff must understand the risks of using AI systems:**

- AI systems can get things wrong and 'hallucinate' incorrect facts
- AI systems can be biased and gullible when responding to leading questions
- The Ministry has an obligation to consider Māori perspectives in our work; AI system bias can raise questions regarding Māori and indigenous information sovereignty, which can breach Māori tikanga by undermining Māori rangatiratanga
- AI systems can be coaxed into creating toxic content and can be prone to 'injection attacks'
- AI systems can store all the information submitted to it, including the identity of requestor; and once information is submitted to the AI system, the Ministry can expect to have no control of the information or how it is used
- AI systems are rapidly evolving, risks can be underexplored, and new developments can bring new risks
- Public attitudes – including social licence – towards AI in general is very unclear
- An AI system is only as good as the information upon which it is trained.

12. **Assume human intervention:** Ministry staff must always assume that another human has access to interactions with AI systems. Ministry staff must be mindful of the information provided and how it might be used maliciously to reflect poorly on yourself, others, or the Ministry. Ministry staff must ensure interactions only contain information that is already publicly discoverable.

13. **Do not use GenAI for legal advice or guidance:** AI systems must not be used to provide legal advice. However, AI systems may be used to help summarise legislation, notes or legal research and commentary.
14. **Automation:** Only Ministry Allowlist AI systems must be used to assist with automation such as handling repetitive tasks, processing or profiling information for contact or customer relationship management, scheduling appointments or processing information. These activities must be managed by Ministry Allowlist AI systems where there are sufficient agreements and information protections in place e.g. Copilot and automation tools such as Power BI and Power Automate available within the Ministry's M365 platform.
15. **New AI systems:** The Ministry is open to critically evaluating any request by Ministry staff who are interested in using a specific AI system for their Ministry activities. Any such request must be made to the Head of Digital and Insights. Following a cyber, information and privacy risk assessment, the AI system will be considered for inclusion on the Allowlist.

## Ministry staff can do this...

- ✓ Copilot is the preferred AI tool for Ministry use. The Ministry has invested and will continue to invest heavily in Microsoft 365 (M365) as its strategic productivity and collaboration platform. Ministry staff can use Copilot to analyse and summarise Ministry information including submissions data because, by operating on data only in the Ministry's M365 tenancy, this means that the safety, security and control of data remains with the Ministry.
- ✓ Ministry staff can also access ChatGPT, Gemini, Perplexity and other AI systems on our "Allow List" via your browser.
- ✓ Ministry staff can ask ChatGPT, Gemini, Perplexity and other AI systems on our "Allow List" questions on information already in the public domain.

- eg can you provide me with a Risk Management framework to assess environmental risks?
- eg can you provide a summary, from the New Zealand Ministry for Regulation Strategic Intent 2024/25-2028/29 document published on its website, of its role in regulatory system leadership?
- eg can you give me a template for a Project Brief for initiation?
- eg who are the regulatory agencies in New Zealand?
- eg what is the purpose and objectives of the New Zealand Financial Markets Authority (FMA)?
- eg can you provide a comparison between hairdressing regulations in Sweden and New Zealand?

## Except for Copilot, Ministry staff can't do this...

- ✗ Upload any data in any form to other AI systems eg ChatGPT, Gemini, Perplexity
- ✗ This means, no we can't ask other AI systems to summarise Ministry information that is not already in the public domain.
- ✗ So, this means, for example, we can't upload submissions data to other AI systems eg ChatGPT, Gemini, Perplexity.

## Related policies and more information

1. [Public Service AI Framework | NZ Digital government](#)
2. [Co-designing Māori data governance - data.govt.nz](#)
3. [Algorithm charter for Aotearoa New Zealand - data.govt.nz](#)
4. [Internal policy | Information and Records Management Policy](#)

5. [Internal policy | Protective Security](#)
6. [Internal policy | Privacy](#)
7. [Internal policy | Acceptable Use Policy](#)

## Glossary

The following terms are used in this policy:

- **Allowlist:** An allowlist, also known as a whitelist, is a security measure that specifies a list of trusted entities (like IP addresses, websites, applications, or email addresses) that are granted permission to access a system or network, while all others are denied access by default. For the Ministry this means automatically blocking all AI systems by default and then only permitting those we wish to allow.
- **Artificial Intelligence (AI):** The field of software engineering that creates services that, without explicit programming, can generate outputs for particular sets of inputs.
- **Generative AI (GenAI):** A system that once prompted or questioned generates text or images or other content that closely resembles human-created content. GenAI works by matching user prompts to patterns selectively downloaded from the Web within a Large Language Model (LLM), then using 'neural networks' to probabilistically 'fill in the blank', along the lines of predictive text messaging. ChatGPT is an example of a GenAI service. Many other GenAI services are available or are under development.

- **Hallucination:** A response by an AI system that may be false or distorted because of the characteristics of the content within the LLM, or the neural network used within the AI system.
- **Injection attack:** A cyberattack where an attacker supplies untrusted input to an AI system which alters the underlying LLM or the course of the system's execution, and allows attackers to access, steal, or compromise the system's information, the system itself, or users' information.
- **IT Security Firewall:** A network security device that monitors and filters incoming and outgoing network traffic based on an organisation's previously established security policies. At its most basic, a firewall is essentially the barrier that sits between a private internal network and the public Internet to protect a network or system from unauthorized access.
- **Māori Data Sovereignty:** Refers to the inherent rights and interests of Māori in relation to the collection, ownership and application of Māori data.
- **M365 Tenancy:** A private dedicated, isolated instance of M365 services, like Office 365, Azure, Intune, etc., assigned to a specific organisation, where all data and user accounts are stored securely.

## Appendix 1 – Approved AI systems

The Ministry is enthusiastic to empower Ministry staff to innovate, safely adopt and derive benefits from using AI systems. An appropriate cyber, information and privacy risk assessment has been satisfactorily completed on

Ministry approved AI systems.

| Product                                                                                               | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Approval date | Approved by * |
|-------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------|
| THE MINISTRY'S PREFERRED AI TOOL is COPILOT which operates within the Ministry's M365 secure platform |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |               |
| Microsoft Copilot Studio                                                                              | Microsoft Copilot Studio is a powerful, cloud-based platform that allows organisations to build, customise, and deploy AI-powered copilots and autonomous agents tailored to their business needs. It's part of the Microsoft Power Platform and integrates deeply with Microsoft 365, Dynamics 365, and other enterprise systems.                                                                                                                                                                                                                                                                                                                                                                                                                                             | 23/05/2025    | CISO/HoDI     |
| Microsoft Designer                                                                                    | Microsoft Designer is a web-based graphic design tool powered by Copilot AI, designed to help users quickly create professional-quality visuals for social media, presentations, marketing materials, and more—without needing advanced design skills.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 23/05/2025    | CISO/HoDI     |
| Microsoft 365 Copilot Chat                                                                            | <p>Copilot Chat is a conversational AI feature within Microsoft 365 that allows users to interact with their work data using natural language. It's part of the broader Microsoft Copilot experience and is designed to help users be more productive by making it easy to ask questions, get summaries, and automate tasks—all through a chat interface.</p> <p>It can access and reason over your emails, documents, meetings, and chats (with appropriate permissions) to provide relevant, personalised responses.</p> <p>Ask things like "What were the key points from last week's meeting?" or "Summarize the latest project update email."</p> <p>Summarise long email threads or documents.</p> <p>Draft emails, reports, or presentations based on your prompts.</p> | 23/05/2025    | CISO/HoDI     |



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|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
|                                                                                        | <p>Analyse Excel spreadsheets and generate insights or visualisations.</p> <p>Create formulas or pivot tables based on natural language queries.</p> <p>Schedule meetings, set reminders, or manage tasks in Outlook and Teams.</p> <p>Help prepare for meetings by summarising past conversations and documents.</p> <p>You can chat with Copilot in a Teams-like interface to ask questions or give instructions.</p> <p>It understands context from your Microsoft 365 environment, making it more personalised and relevant.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |            |           |
| Microsoft 365 Copilot (Paid version)                                                   | <p>Microsoft 365 Copilot—is a premium AI assistant designed to enhance productivity, creativity, and decision-making across an organisation. It integrates deeply with Microsoft 365 apps like Word, Excel, Outlook, Teams, and PowerPoint, and is tailored for enterprise environments with robust security, compliance, and management features.</p> <p>It uses natural language to generate content, summarise documents, analyse data, and automate tasks in Word, Excel, Outlook, PowerPoint, and Teams.</p> <p>It has a conversational interface that allows users to interact with their work data and documents using AI-powered chat.</p> <p>You can build and manage custom AI agents tailored to your business needs, including SharePoint-based agents and integrations via Microsoft Graph connectors.</p> <p>It has built-in data protection, IT management controls, and compliance with Microsoft's enterprise security standards.</p> <p>Copilot reasons over personal work data (emails, files, meetings) to provide context-aware assistance.</p> | 23/05/2025 | CISO/HoDI |
| STAFF CAN USE THESE TOOLS BELOW, BUT MUST NOT UPLOAD MINISTRY DATA INTO THE AI SYSTEMS |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |            |           |
| Adobe Express                                                                          | Adobe Express is a user-friendly, web-based content creation platform designed for anyone—from beginners to professionals—who wants to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 23/05/2025 | CISO/HoDI |

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |           |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
|                  | quickly create high-quality graphics, videos, and documents. It's especially popular among social media marketers, educators, small businesses, and content creators.                                                                                                                                                                                                                                                                                                                                                                                                                                   |            |           |
| Adobe Sensei     | Adobe Sensei is Adobe's AI engine that powers smart features across its apps to help users create, edit, and analyse content more quickly and intelligently. It is generally built into other Adobe products such as photoshop and lightroom rather than being an app in itself.                                                                                                                                                                                                                                                                                                                        | 23/05/2025 | CISO/HoDI |
| ChatGPT          | ChatGPT is based on a large language model (like GPT-4), trained on vast amounts of text data. It doesn't "know" things like a human does, but it can generate highly relevant and coherent responses based on patterns in the data it was trained on.                                                                                                                                                                                                                                                                                                                                                  | 23/05/2025 | CISO/HoDI |
| Anthropic Claude | Anthropic Claude is a family of advanced AI models developed by Anthropic, a company founded by former OpenAI researchers. As of 2025, the latest generation is the Claude 4 series, which includes two models: Claude Opus 4 and Claude Sonnet 4. These models are designed to be powerful, safe, and capable of handling complex, long-running tasks with minimal human input. It can:<br>Understand and generate human-like text, perform deep reasoning and analysis, automate workflows and long-term tasks, write and debug code, summarise, search, and synthesise large volumes of information. | 23/05/2025 | CISO/HoDI |
| Google Gemini    | Gemini (formerly Google Bard) is Google's conversational AI chatbot. Gemini runs on Google's family of multimodal AI models to understand and generate text, and work across other mediums like images, audio, and video.                                                                                                                                                                                                                                                                                                                                                                               | 23/05/2025 | CISO/HoDI |
| Perplexity       | Perplexity AI is an AI-driven search engine and chatbot that uses large language models (LLMs) to answer user queries by drawing information from the web and providing cited sources within its responses.<br>The AI model combines a traditional search engine with an AI assistant, delivering answers in natural language backed by references.                                                                                                                                                                                                                                                     | 23/05/2025 | CISO/HoDI |

|                                                                            |                                                                                                                                                                                                                                                                                                                   |            |           |
|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
| Napkin AI                                                                  | Napkin AI is a creative and organisational tool designed to help users capture, connect, and reflect on their ideas using artificial intelligence. It acts like a personal thinking partner, ideal for writers, researchers, creatives, and anyone who wants to make sense of scattered thoughts or inspirations. | 23/05/2025 | CISO/HoDI |
| * CISO/HoDI = Chief Information Security Officer   Head of Data & Insights |                                                                                                                                                                                                                                                                                                                   |            |           |

Edit



## Promoting responsible AI – guidance for regulators

|                         |                                                                         |                 |             |
|-------------------------|-------------------------------------------------------------------------|-----------------|-------------|
| Date                    | 20 May 2026                                                             | Priority        | Low         |
| Security classification | In confidence                                                           | Tracking number | MFR2026-080 |
| Attachments             | Annex 1: Responsible AI in Action – AI guidance and associated products |                 |             |

### Action sought

| Required from                                | Action                               |
|----------------------------------------------|--------------------------------------|
| Hon David Seymour<br>Minister for Regulation | <b>Note</b> the enclosed information |

### Contact for discussion if required

| Name        | Position                             | Phone number | 1 <sup>st</sup> contact             |
|-------------|--------------------------------------|--------------|-------------------------------------|
| Alex McMinn | Head of Regulatory System Capability | s 9(2)(a)    | <input checked="" type="checkbox"/> |

#### Minister's office to complete

- |                                         |                                            |
|-----------------------------------------|--------------------------------------------|
| <input type="checkbox"/> Noted          | <input type="checkbox"/> Needs change      |
| <input type="checkbox"/> For discussion | <input type="checkbox"/> No further action |

#### Comments

Annex 1 is available on the Ministry for Regulation website: <https://www.regulation.govt.nz/for-regulators/resources-for-regulators/ai-guidance-for-regulators/>



## Promoting responsible AI – guidance for regulators

|                         |               |                 |             |
|-------------------------|---------------|-----------------|-------------|
| Date                    | 20 May 2026   | Priority        | Low         |
| Security classification | In confidence | Tracking number | MFR2026-080 |

### Purpose

This memo provides you with information about the Ministry's artificial intelligence (AI) guidance for regulators and the associated products being released alongside it. It also shares the Ministry's plan to promote the guidance.

### Background

1. AI is advancing quickly, but across the regulatory sector there is not yet widespread use or sustained investment, despite some early experimentation. Used well, AI can help regulators work more efficiently, reduce unnecessary burden on regulated parties, and innovate in how regulatory systems operate.
2. This guidance aims to make AI more accessible for regulatory leaders and support responsible use. It helps leaders identify where AI can add value to regulatory practice, apply it appropriately, and maintain accountability, transparency, and human judgement.
3. Regulatory leaders told us the existing body of AI guidance produced by the public service was difficult to navigate and not practical enough, and that little of it spoke to their specific regulatory context.
4. This guidance focuses on the regulatory context where decisions affect people's rights, obligations, and public confidence, and complements, rather than duplicates the wider public service AI frameworks. It was informed by an AI roundtable with regulatory leaders in November 2025 (co-hosted with the Department of Internal Affairs) and an AI event co-hosted with MartinJenkins in March 2026, and was independently peer reviewed by LensenMcGavin AI, specialists in AI and law.

### Value to regulators

5. The guidance is being released as a suite of products, so that different audiences can engage with it in the way that suits them:
  - **Responsible AI in Action** — the full guidance, setting out practical steps for regulatory leaders across strategy and governance, vendor engagement, workforce readiness, and ethical use.
  - **AI summary guidance** - for leaders who need the essentials quickly.
  - **Bite-size modular series** - short, standalone guidance on specific topics (including leadership mindset, opportunities and risks, organisational integration, procurement, rolling out AI, and empowering people), so leaders can pick up the parts most relevant to them.



- **Videos - AI in regulatory practice** - a set of videos from the March 2026 AI event, making the material accessible in a format that suits different preferences.
6. Together these products lower the barrier to engaging with the guidance:
- the full guidance provides depth
  - the summary provides speed
  - the modular series allows targeted use, and
  - the videos broaden reach.

## **Opportunity and likely impact**

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7. The goal is for regulators to adopt AI in ways that are safe, accountable, and that genuinely improve regulatory practice, rather than encouraging adoption for its own sake.
8. Take-up of AI across the public sector is still at an early stage, the 2025 Public Service Census found that only 12% of public servants use AI weekly, and 67% have never used it for work.
9. The opportunity is to help regulators move from early experimentation to deliberate, well-governed use. The guidance is practical, grounded in the New Zealand regulatory context, and complements the wider public service AI frameworks.
10. We expect the guidance to be well received. The AI event has already generated strong interest, and there is clear demand for practical guidance of this kind from across the public sector and private industry alike. Given that level of interest, the guidance was independently and externally peer reviewed by LensenMcGavin AI, specialists in AI and law, to ensure its credibility and defensibility.

## **Promotion and uptake**

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11. An email with a link to the AI guidance products on the Ministry for Regulation website will be sent early in the week of 25 May 2026 to all 70-plus attendees of the AI event co-hosted with MartinJenkins in March 2026.
12. This will be followed shortly after by your press release announcing the guidance. The guidance and associated products will not be publicly accessible, until the press release has been issued.
13. Following the press release, a post will be made on the Ministry's LinkedIn page, with further posts over the coming months promoting each of the products in turn.
14. The June editions of the email newsletters sent by the Ministry for Regulation and DPMC's Policy Project will further promote the guidance to a public sector audience.
15. The Ministry will also engage with international regulatory practice communities in Australia, the United Kingdom, and Canada, which have large membership bases and often collaborate on leading or novel regulatory topics.



## Attachments

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16. Attached are the following documents:

- Annex 1: Responsible AI in Action — AI guidance and associated products



## **Annex 1: Responsible AI in Action — AI guidance and associated products**

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Annex 1 is available on the Ministry for Regulation website: <https://www.regulation.govt.nz/for-regulators/resources-for-regulators/ai-guidance-for-regulators/>