



Editorial: AI “Accountable Officials” In the APS

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The Australian Government is taking important steps to strengthen the adoption and governance of artificial intelligence (AI) across the Australian Public Service (APS), including through the introduction of a new Chief AI Officer (CAIO) role. Agencies are expected to appoint a CAIO from existing senior leadership by July 2026, with responsibility spanning AI strategy, transformation, and its safe effective use.

In practice, agencies may embed this function within existing technology leadership roles, such as Chief Information Officer (CIO), Chief Technology Officer (CTO), or Chief Data Officer (CDO). While pragmatic, this approach raises questions about whether sufficient focus and capability can be sustained given the breadth and complexity of the role.

The [APS AI Plan](#) (2025) and the [Policy for the Responsible Use of AI in Government 2.0](#) (2025) together establish the coordinated governance framework for AI across the APS. They set expectations for agency-level adoption, governance arrangements, capability, and executive accountability to support responsible AI use and improve service delivery and community outcomes across non-corporate Commonwealth entities.

However, the framework’s flexibility and implementation sequencing may affect consistency and effectiveness across the APS.

AI Accountable Officials

Under the frameworks, agencies are required to appoint a CAIO alongside an AI Accountable Official (AO). While the CAIO is intended to lead AI strategy and transformation, the AO will provide governance and oversight. The policy permits these roles to be fully combined with existing senior executives (such as CIO, CTO, or CDO), partially combined, or separated across individuals and teams, depending on organisational structure and capability.

This flexibility enables agencies to tailor implementation to their size, maturity, and existing digital leadership arrangements. However, it is also likely to result in variation across the APS in how the CAIO function is defined and implemented, including differences in reporting arrangements, scope of responsibilities, and resourcing approaches. In turn, this variation may introduce governance complexities and challenge the consistency of a unified, APS-wide approach.

Where the CAIO role is combined with other senior executive functions such as CIO, CTO, or CDO, there is potential for competing priorities to influence the level of focus applied to AI-specific leadership and oversight. Conversely, where responsibilities for AI strategy, delivery,

and assurance are distributed across multiple roles and teams, clear delineation of accountability and effective coordination becomes increasingly important. In the absence of well-defined role boundaries and integration across governance functions, accountability for AI outcomes may become less distinct, affecting the efficiency, coherence, and timeliness of decision-making and oversight, and ultimately the ability to realise consistent outcomes from AI adoption across the APS.

These challenges are further exacerbated by the rapid pace of AI development, which will require ongoing capability uplift at both organisational and executive levels. Maintaining an informed understanding of evolving technologies, risks, and regulatory expectations will require continuous learning and adaptation. Where the CAIO function is assigned to an existing senior leader, this is likely to place additional demands on time and capability development alongside existing responsibilities. This reinforces the importance of adequate support structures, resourcing, and access to specialist expertise to enable sustained and effective oversight of AI initiatives and delivery of the Plan's objectives.

International Practice

The broader international policy environment provides useful comparative context. The [OECD AI Principles](#) (updated May 2024) emphasise clear, traceable accountability across the AI lifecycle. The [NIST AI Risk Management Framework](#) (2023) highlights the need for integrated governance that ensures end-to-end responsibility for AI risks and outcomes. Similarly, the UK Department for Science, Innovation and Technology AI Regulation [White Paper](#) (2024) cautions against unnecessary governance complexity, particularly where layered structures may reduce implementation efficiency. [The World Economic Forum AI Governance Framework](#) (2025) and [OECD Governance Report](#) (2025) also note that separating innovation and assurance functions can create differing operational incentives, particularly where delivery and risk management responsibilities are split across teams. These observations reinforce concerns about similar risks within the APS model.

Will it work?

Within the APS context, the introduction of AO's alongside CAIO roles establishes a multi-layered governance model supporting both strategic oversight and operational accountability. However, the effectiveness of this model will depend on the consistency with which governance roles are defined and implemented across agencies, and the extent to which strategic and operational responsibilities are effectively integrated.

In parallel, the Policy to appoint CAIOs which commenced in December 2025, requires that agencies develop an organisational position on AI adoption within six months of that date. This establishes a sequencing in which agency AI strategies are formed prior to the appointment of CAIOs, limiting the ability of the designated AI leadership role to shape the strategic direction they are subsequently responsible for delivering.

Overall, the APS AI governance framework should provide a structured but flexible approach to accountability and leadership for AI adoption across government. Its effectiveness will depend not only on how roles are defined, but on the extent to which flexibility is balanced

with clear accountability, consistent implementation, and effective integration across governance functions.

To enable effective implementation of this reform, the government needs a dedicated mechanism for monitoring, performance audit, and reporting. This should include, where appropriate, periodic assessments of agency AI maturity. Clear reporting pathways will be important to ensure transparency, accountability, and continuous improvement across agencies.