

Making the most of AI in Finnish central government

A guide for organisational developers
navigating the early stages of change

Public Sector ICT

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MINISTRY
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Making the most of AI in Finnish central government A guide for organisational developers navigating the early stages of change

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Author(s)	Virpi Hotti, Riitta Piela, Jouni Lähteenmäki, Mika Vinblad, Tuuli Tulonen, Eija Hartikainen, Pirkko Lahdelma, Miia Kotala, Timo Impiö, Riku Mäki, Päivi Kynkäänniemi, Juha Vuojärvi, Vilhelm Backman	
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Abstract

'Making the most of AI in Finnish central government' is a guide designed for central government agencies and public bodies seeking to leverage artificial intelligence (AI) to improve their operations. The guide supports public officials in understanding how AI can be used in central government administration to boost productivity, manage risks and optimise costs. It also encourages organisations to begin exploring how AI works and to deepen their understanding of its potential.

AI systems are categorised into four risk levels, in line with the EU's AI Act. The guide outlines the responsibilities associated with AI and highlights its role as part of broader solutions, with a strong emphasis on adhering to the principles of responsible AI.

AI governance calls for new kinds of competencies and better AI literacy. The key guiding principles are responsibility, sustainability and transparency. The guide provides practical advice, and examples of use cases and governance models.

The guide was developed in collaboration with customers of the Government ICT Centre Valtori, through the cloud cooperation group under Valtori's Customer Advisory Board. It complements the earlier guidelines issued by the Ministry of Finance on using generative AI to support and assist work in public administration.

Keywords artificial intelligence, machine learning, public administration, central government, public sector ict

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Tekoäly hyötykäyttöön valtionhallinnossa Opas organisaation kehittäjille muutosmatkan alkutaipaleelle

Valtiovarainministeriön julkaisuja 2025:33	Teema	Julkisen hallinnon ICT
Julkaisija	Valtiovarainministeriö	
Tekijä/t	Virpi Hotti, Riitta Piela, Jouni Lähteenmäki, Mika Vinblad, Tuuli Tulonen, Eija Hartikainen, Pirkko Lahdelma, Miia Kotala, Timo Impiö, Riku Mäki, Päivi Kynkäänniemi, Juha Vuojärvi, Vilhelm Backman	
Kieli	Sivumäärä	21

Tiivistelmä

Tekoäly hyötykäyttöön valtionhallinnossa -opas on suunnattu valtionhallinnon virastoille ja laitoksille, jotka haluavat hyödyntää tekoälyä toiminnan kehittämisessä. Oppaan tarkoituksena on auttaa ymmärtämään tekoälyn potentiaalin hyödyntämistä valtionhallinnossa tuottavuuden parantamisessa, riskien hallinnassa ja kustannusten optimoinnissa sekä kannustaa organisaatioita aloittamaan tekoälyn opiskelun ja ymmärryksen kasvattamisen.

Tekoälyjärjestelmät luokitellaan neljään riskikategoriaan EU:n tekoälysäädöksen mukaisesti. Opas käsittelee vastuullisuusvaatimuksia ja tekoälyn roolia osana ratkaisua, korostaen vastuullisen tekoälyn periaatteiden noudattamista.

Tekoälyn hallinta edellyttää uudenlaista osaamista ja tekoälylukutaitoa. Keskeiset periaatteet ovat vastuullisuus, kestävyys ja läpinäkyvyys. Opas tarjoaa konkreettisia neuvoja ja esimerkkejä eri käyttökohteista ja hallintamalleista.

Nyt julkaistava opas on kirjoitettu Valtorin asiakasneuvottelukunnan alaisessa pilviyhteistyöryhmässä yhdessä Valtion tieto- ja viestintätekniikkakeskus Valtorin asiakkaiden kanssa. Ohjeistuksen löydettävyyden varmistamiseksi Valtorin asiakasneuvottelukunnan oppaan julkaisee Valtiovarainministeriö.

Asiasanat julkisen hallinnon ICT, tekoäly, koneoppiminen, julkinen hallinto, valtionhallinto

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Effektiv användning av AI inom statsförvaltningen

En guide inför förändringsresan för dem som utvecklar verksamheten vid sin organisation

Finansministeriets publikationer 2025:33		Tema	Offentliga förvaltningens ICT
Utgivare	Finansministeriet		
Författare	Virpi Hotti, Riitta Piela, Jouni Lähteenmäki, Mika Vinblad, Tuuli Tulonen, Eija Hartikainen, Pirkko Lahdelma, Miia Kotala, Timo Impiö, Riku Mäki, Päivi Kynkäänniemi, Juha Vuojärvi, Vilhelm Backman		
Språk	Engelska	Sidantal	21
Referat	<p>Guiden "Effektiv användning av AI inom statsförvaltningen" riktar sig till de ämbetsverk och inrättningar inom statsförvaltningen som vill utveckla sin verksamhet med hjälp av artificiell intelligens (AI). Guiden bidrar till förståelse av hur potentialen hos AI kan utnyttjas inom statsförvaltningen med sikte på bättre produktivitet, riskhantering och optimering av kostnader. Syftet är också att uppmuntra organisationerna att lära sig använda och få bättre förståelse av AI.</p> <p>AI-system klassificeras i fyra olika riskkategorier enligt AI-förordningen. I guiden behandlas ansvarskrav och AI:s roll som en del av lösningen, med betoning på iakttagandet av principerna för ansvarsfull AI.</p> <p>Styrningen av AI kräver ny kompetens och AI-kunnighet. De viktigaste principerna är ansvarsfullhet, hållbarhet och transparens. Guiden innehåller konkreta råd och exempel som gäller olika användningsområden och styrmodeller.</p> <p>Denna guide har utarbetats i samarbete med Statens center för informations- och kommunikationsteknik Valtoris kunder och inom ramen för samarbetsgruppen för molnfrågor, som lyder under Valtoris kunddelegation. Guiden kompletterar finansministeriets tidigare anvisningar om utnyttjande av generativ artificiell intelligens (AI) som stöd och hjälpmedel i arbetet inom den offentliga förvaltningen.</p>		
Nyckelord	IKT inom den offentliga förvaltningen, artificiell intelligens, maskininläring, offentlig förvaltning, statsförvaltningen, offentliga förvaltningens ict		
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1 Introduction

This document is for the networks and ministries promoting the development of artificial intelligence (AI) and for the management and employees of all government agencies and public bodies whose roles involve developing organisational operations by making the most of the opportunities AI can offer. In addition to the agency's AI coordinator (or person in charge of AI matters), expertise in how to put AI to good use is probably included in the job descriptions of data protection, information security and ICT specialists, lawyers, information management personnel, architects, and the product owners, project managers and supervisors contributing to the development of the agency's information systems. If you think your organisation could utilise AI to make a major productivity leap in future, your organisation should start learning and understanding how AI works now.

Generative AI services, like ChatGPT or Microsoft's Copilots, which are based on large language models, have made AI accessible to every public official. These services' ability to produce natural language based on probabilities has made them popular for generative tasks. Generative tasks create new content or information, such as text, images, sound or other data. However, AI is more than generative AI. It is a general concept and should be seen as a means to solve operational problems or address development needs.

This document examines AI systems from various perspectives, such as responsibility (Chapter 2). Understanding the main types of machine learning models and their key applications (Chapter 3) is crucial for AI utilisation, and organisations should prepare for the use of AI systems (Chapter 4). Considerations for AI governance are presented at the end of the document (Chapter 5).

This guide was written in collaboration with customers of the Government ICT Centre Valtori, within the cloud cooperation group operating under Valtori's Customer Advisory Board. It complements the earlier guidelines issued by the Ministry of Finance on using generative AI to support and assist work in public administration. To ensure the guidance is easy to find, the Ministry of Finance is publishing this guide on behalf of Valtori's Customer Advisory Board.

2 Perspectives on the use of AI systems

AI systems are classified into four risk categories according to the EU Artificial Intelligence Act 2024/1689:

- a) systems with an unacceptably high risk are prohibited,
- b) high-risk systems have numerous requirements,
- c) certain limited-risk systems have transparency and other obligations, and
- d) low-risk systems currently have no requirements, although recommendations from authorities are forthcoming.

The wider the application of the AI system, the more important it is to focus on its responsibility and to examine any errors it may cause (Table 1). The role of AI as part of the solution (Table 2) affects adherence to the principles of responsible AI.

Table 1. Examples of responsibility requirements for different types of AI systems.

Example	Responsibility requirements	Impacts of errors
AI is used for spell checks or automated calendar management	Basic reliability, user-friendliness, taking data protection into account.	The impacts of errors are minor and can easily be corrected without significant harm.
AI is used in customer service bots or employee support tools, such as project management or resource allocation	In addition to reliability, information security, compliance with terms of use, and respect for privacy must be ensured. The user interface must be clear and the system must provide sufficient error detection and management.	The impacts of errors may lead to delays or inaccuracies in processes, but they are not likely to cause serious harm.

Example	Responsibility requirements	Impacts of errors
AI is used in economic forecasting, resource management, or supporting public sector decision-making, such as producing key national economy figures	High reliability, transparency, ethics and responsibility. It must be ensured that algorithms are accurate and fair, and that any errors are minimal and can be corrected. Comprehensive information security and privacy protection are required.	Errors can lead to significant economic or social impacts. Incorrect results may lead to wrong kinds of decisions that affect the national or international level.
AI is used for making diagnoses in healthcare, for autonomous driving or in national security systems	Extremely high reliability, ethics, transparency and fairness. Systems must be flawless, fully tested and validated before deployment. All risks must be minimised, and strong ethical guidelines and regulation are needed.	Mistakes can lead to loss of life, serious financial losses or a national security threat.

Table 2. Role of AI as part of the solution

Level	Role	Task
1	Augmented intelligence	Assistant, such as a general-purpose language model that users can chat with and ask questions. The answers will not be used as such.
2	Collaborative AI	Analyses, edits or categorises data. A human verifies the outcome. The AI system can learn from the results.
3	Autonomous AI	Makes decisions independently without human verification.

The principles of responsible AI must always be followed and particular attention paid to them the greater the role AI plays (Table 2). When you adhere to the principles of responsible AI, you will also meet the key requirements of the EU Artificial Intelligence Act, especially with regard to lower responsibility requirements. Responsible AI means developing and using AI in a way that is ethical, safe, transparent and fair. It ensures that AI systems are non-discriminatory, protect individuals' privacy and act reliably in all situations. Responsibility also means that AI solutions are continuously monitored and that people have the opportunity to understand and intervene in the decisions AI makes, especially in critical situations.

High-risk AI systems, which are specified in Annex III of the AI Act 2024/1689, must be subjected to a fundamental rights impact assessment (FRIA). It weighs the AI system against the fundamental rights laid down in the European Charter of Fundamental Rights¹ and the European Convention on Human Rights². If a data protection impact assessment (DPIA) and transfer impact assessment (TIA) need to be carried out, they can be combined.

The Organisation for Economic Co-operation and Development (OECD) has drawn up principles for responsible AI to help member countries and organisations manage AI risks and find benefits³. The OECD principles of responsible AI⁴ oblige the developers and maintainers of AI systems, but above all they protect the interests of people and the environment:

- a) **Inclusive growth, sustainable development and wellbeing.** Guides the development and use of AI to reduce inequality between people, increase wellbeing and safeguard natural resources.
- b) **Respect for the rule of law, human rights and democratic values, including fairness and privacy.** AI developers and maintainers are responsible for overseeing AI to prevent misuse and the spread of misinformation and disinformation.

1 [Charter of Fundamental Rights of the European Union](#)

2 [European Convention on Human Rights](#)

3 [What we do - OECD.AI](#)

4 Adapted from [AI Principles Overview - OECD.AI](#) (Finland is committed to the principles as an individual state and through EU membership)

- c) **Transparency and explainability.** The development and use of AI should be transparent and explainable. Both developers and users must be able to understand the purpose of AI in each use case. Users must be informed when they interact with AI.
- d) **Robustness, security and safety.** Developers and maintainers must ensure the safety and sustainability of the AI system they provide throughout the entire lifecycle of the system.
- e) **Accountability.** Those developing and maintaining AI are held accountable for the appropriate functioning of AI and compliance with responsible principles.

In Finland, the Digital and Population Data Services Agency has drawn up the 'Using AI Responsibly' guide for software developers on the responsible use of AI⁵. The guide provides practical advice on how to assess your organisation's capabilities, how to create ethical practices and how to prepare for the risks of AI systems.

5 [Using AI responsibly - Suomi.fi for Service Developers](#)

3 Main types and uses of machine learning models

This chapter examines the machine learning models on which AI is based (including language models). The models can be grouped in different ways (Table 3).

Table 3. Examples of the criteria for categorising machine learning models.

Approach	Learning style	Example tasks
Task-driven or supervised machine learning	Algorithms or models learn from marked (labelled) data	Classification Regression Creating text according to a specific style Code generation for a specific task
Data-driven or unsupervised machine learning	Algorithms or models learn from data	Clustering Identification of dependencies
Environment-driven or reinforcement learning	Algorithms or models learn by receiving rewards and punishments	Playing games Controlling robots

General-purpose AI systems and pre-trained models are specific types of machine learning models. General-purpose AI systems can create text and other modalities based on prompts. Pre-trained models are suited to generative tasks that produce new content, such as images, music, text or videos. General-purpose AI systems, such as GPTs, are advanced AI models that are pre-trained for specific tasks in AI systems. Pre-trained models are fine-tuned or further trained with the organisation's own material. Examples of the end results of pre-trained models include a customer service bot that understands the organisation's vocabulary.

Examples of the uses of machine learning models.

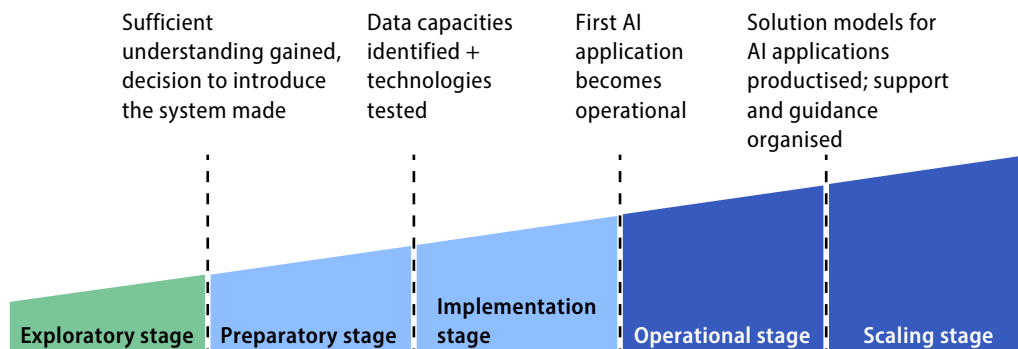
- **Creative writing or illustration:** Creating text and images using prompts.
- **Summarising or interpreting the content:** Summarising and interpreting data sets in different languages. Producing an analysis or a story from tabulated data.
- **Creating diagrams:** Generating syntax-based diagrams (such as Mermaid diagrams) based on images or text.
- **Generating or interpreting software code:** Many integrated development environments (IDEs) now support the use of AI. For example, in Oracle APEX, you can use prompts to build applications. You can also ask AI assistants to interpret code, generate diagrams or tables based on code snippets, or provide written explanations. AI coding assistants, such as Copilot, are also available as integrations in Microsoft Visual Studio and the GitHub library. Advances in agent-based technologies are enabling an approach called vibe coding, where developers can write code based on prompts and intuition. For example, Microsoft Visual Studio offers an Agent Mode to support this.
- **Surfacing sources:** In AI systems that use organisation-specific data, such as legislation or official documents, answers to user questions can include links to the original sources and, when relevant, direct quotations.
- **Translation:** If translation memories are needed, pre-trained models can be trained with the organisation's translation memories and the trained model can be used in translation.
- **Ensuring accessibility:** Converting text into easy language. Converting text or images into speech. Converting speech into images or text. Converting images into speech or text.
- **Various classifiers:** For example, automatic classification of customer service calls based on content (Digital and Population Data Services Agency).

- **Various forecasts:** Cash flow forecasting with neural networks (State Treasury).
- **Changing content data type, identifying necessary information and forming outputs suitable for the purpose:** For example, speech or text are data types, and changes are often made from speech to text or text to speech. When conversion includes identifying necessary information and forming outputs suitable for the purpose, multiple AI techniques are needed. For example, a doctor-patient conversation can be converted into text and then processed into a summary for the patient's medical record's for a Finnish wellbeing services county.
- **Producing decision proposals:** First, a large number of high-quality decision documents and their source documents are structured and enriched with metadata using a machine learning model. This training material is used to train a language model, which is then validated using new case-specific data. For production use, an automated processing pipeline for case-specific documents is built. Each case is first analysed with a machine learning model, and then a language model generates a proposal for a decision document. If the quality of the produced decisions is good and the solution meets responsibility requirements, it can be productised and offered as an assistant to decision-makers. However, this use case requires deep expertise in AI utilisation and significant investment in developing the solution. Users are always responsible for the results generated by the AI they use for work, and for the utilisation of such results. Currently, we are not aware of any public administration organisation in Finland where this is actually being done.

4 Preparing for the use of AI systems

The implementation of AI technology follows the same stages as any technology implementation, including architecture design, information security and data protection assessment, risk assessment and residual risk management, and governance model planning (Figure 1). The lifecycle of an AI system is similar to that of other service solutions. However, because AI systems are data-driven, there is stronger focus on oversight during use and on monitoring performance and quality throughout the lifecycle. AI technology providers often have the ability to make changes to services independently. As a result, change management, testing, and quality control solutions and expertise require more attention than in traditional IT services.

Figure 1. Stages of AI deployment⁶



⁶ Adapted from Poikola A., Wong D., Lähteenoja V., Turpeinen M. (2024). State of Finnish Data Spaces – Experiences of pioneers in building the data economy. SITRA STUDIES 243. <https://www.sitra.fi/en/publications/state-of-finnish-data-spaces>, p. 21

In the preparatory stage of AI system deployment, you should investigate the following:

- Governance:
 - Define clear objectives for the use of AI systems based on the organisation's strategy, considering the constraints of legislation and other normative documents – particularly note the specific requirements of the EU Artificial Intelligence Act.
 - Whether you develop the AI system yourself or have others develop it, compile the responsibilities and roles related to the development and implementation into an AI governance model.
 - The management of the information management unit or the agency must approve the implementation of AI systems based on a risk-based decision.
 - Confirm the lifecycle costs of the implementation, and the overseeing and measurement of the AI system's functionality
 - Ensure the necessary skills and training needs for staff and other participants.
 - Ensure quality assurance of the results produced by AI systems.
 - Monitor the use of AI systems.

- Use cases and methods:
 - First identify and describe beneficial use cases in the organisation and then assess the risk level according to the AI Act and the obligations set for each role (such as supplier or implementer) based on the risk level.
 - Investigate and network: what use cases have other organisations already implemented.
 - Avoid high-risk use cases until the risk mitigation measures are clear.

- Technologies:
 - Choose suitable AI technology that can achieve the objective.
 - Identify the limitations of the chosen AI technology.
 - Ensure the suitability of the AI models for the intended purpose.
 - Experiment before broader development and determine the production requirements, such as technology platforms. Experimentation helps identify truly productive solutions and discard non-functional ones.

- Data:
 - Ensure the quality and timeliness of the data.
 - Check the contractual terms related to the AI system’s scope of data processing and intellectual property rights.
 - Classify the level of disclosure of the information contained in the system and assess whether personal data is included.
 - Describe the data flow of the AI system (i.e. data flow diagram) to identify risk points.

The procurement and implementation of AI systems should follow similar phases to those of other information systems. An AI system may incur significant costs and cost increases, which should be considered in advance during procurements or contracts. Operating costs may change unpredictably as the extent of usage changes. For example, general-purpose AI models may become expensive as usage expands, so it is important to consider maintenance costs when using pre-trained models.

“The technical implementation of AI solutions [AI systems] should also be planned across ministry boundaries, otherwise there is a risk of a fragmented development and production environment in central government [...] the idea of a cross-administrative base solution that could be further developed for specific use cases by ministries and agencies.”⁷ When procuring AI systems, it is advisable to consider whether they could also be suitable for other parties, serving as a base solution. Cross-administrative base solutions require planning and designated responsible parties, so that those without their own development capabilities can rely on these solutions.

7 Penttilä A., Holkko P., Mäkilä N., Tammes-Peters H. (2024). Experiments using generative AI in public administration: Report. Ministry of Finance publications 2024:48. <http://urn.fi/URN:ISBN:978-952-367-840-8>, p. 56

5 Towards AI governance

Whether you are developing the AI system yourself or having it developed by others, the creation and use of AI systems require new skills and knowledge. AI literacy, as defined by the AI Act, is needed during the implementation and use of AI systems to assess the correctness of the outputs. While developing AI literacy, it is also necessary to develop the ability to evaluate different AI technologies and available AI services, which evolve from the utilisation of general-purpose AI models towards autonomous agents. For example, prompts can be used to get answers to questions or create new AI systems.

AI governance takes into account the organisation's existing decision-making and governance models. AI governance is a comprehensive process consisting of inventory, impact assessment, and control processes:

- Inventory processes review normative documents and the characteristics of AI systems and models, conduct risk assessments, and define mitigation measures.
- Impact assessment processes focus on data protection and data flows as needed, and possibly on fundamental rights.
- Control processes scan data sets, and monitor IT resources and assess their compliance.

The organisation is bound by various statutes, regulations or decisions. The organisation decides which other normative documents it observes. The policies that the organisation follows are formed based on normative documents. Additionally, normative documents are used to define and articulate matters and influence technology platform controls.

Normative documents related to AI governance include the following:

- Binding regulation (hard law)
 - Artificial Intelligence Act 2024/1689⁸
- Non-binding regulation (soft law)
 - Commission publishes the guidelines on prohibited AI practices, as defined by the AI Act⁹.
 - Ethical Guidelines for AI in Public Administration¹⁰
 - Guidelines on using generative artificial intelligence to support and assist work in public administration¹¹

In addition to AI-specific regulation, organisations must also consider the broader legal framework that applies to their operations and responsibilities. Depending on the organisation's duties and the governance models it follows, relevant special legislation must also be taken into account. Below are some examples of documents that are generally important to consider¹²:

- Hard law
 - EU General Data Protection Regulation (EU 2016/679)
 - Data Protection Act (1050/2018)
 - Act on the Openness of Government Activities (621/1999)
 - EU General Data Protection Regulation (EU 2016/680)
 - Act on the Processing of Personal Data in Criminal Matters and in Connection with Maintaining National Security (1054/2018)
 - Administrative Procedure Act (434/2003)
 - Act on Information Management in Public Administration (906/2019)
 - Government Decree on Security Classification of Documents in Central Government (1101/2019)

8 [Regulation - EU - 2024/1689 - EN - EUR-Lex](#)

9 [Commission publishes the Guidelines on prohibited artificial intelligence \(AI\) practices, as defined by the AI Act. | Shaping Europe's digital future](#)

10 [Ministry of Finance. Ethical Guidelines for AI in Public Administration](#)

11 <https://julkaisut.valtioneuvosto.fi/handle/10024/166201>

12 [Tammes-Peters H. \(2025\). Guidelines on using generative artificial intelligence to support and assist work in public administration. Ministry of Finance publications 2025:9. <http://urn.fi/URN:ISBN:978-952-367-854-5>](#)

- Soft law
 - Cloud service guidelines for central government administration¹³
 - VAHTI good practices support materials¹⁴
 - ISO/IEC 42001:2023 - Artificial intelligence — Management system
 - ISO/IEC 23894:2023 Information technology — Artificial intelligence — Guidance on risk management
 - NIST Artificial Intelligence Risk Management Framework (AI RMF 1.0)

It is important to identify which matters belong to each governance model and to consider what should be included in the information management model according to the Finnish Information Management Act, such as recommendations from the Information Management Board. Gartner's comprehensive Executive AI Governance Playbook¹⁵ on AI governance areas (Figure 2) serves as a useful checklist for topics discussed in AI governance.

13 Kangasaho T., Kaarlonen E., Viiman S., Vuorikallio J., Vuojärvi J. (2024). Cloud service guidelines for central government administration. Ministry of Finance publications 2024:49. <http://urn.fi/URN:ISBN:978-952-367-844-6>

14 Digital and Population Data Services Agency. Digital Security Publications. [Digital Security Publications | Digital and Population Data Services Agency](#) (Retrieved 14 April 2025)

15 Gartner. (8 January 2025 - ID G00821275). Executive AI Governance Playbook.

Table 4. Areas of AI governance

Top level	Category specifications or main categories	Category details
AI Governance	Governance Operating Model	Responsible AI
		Organization & Teams
		Decision Rights
		People & Culture
		Mandate & Scope
		Communication
	Policies & Controls	AI Risk
		Legal & Regulatory Compliance
		AI Security
		AI Ethics
		Principles
		Privacy
		Trustworthy AI
	Oversight Systems	Sustainable AI
		AI Life Cycle
		Monitoring & Compliance Reporting
		Data Governance
		Testing & Validation
	Governance Systems & Tools	
	Vendor Coordination	



MINISTRY
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MINISTRY OF FINANCE
Snellmaninkatu 1 A
PO BOX 28, 00023 GOVERNMENT
Tel. +358 295 160 01
financeministry.fi

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