



BONUS TOOLKIT · GOVERNANCE & MONITORING

# The Broker AI *Governance Worksheet*

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A working document for broker MDs. Fill it in once. Update it before every PI renewal. Hand it to an underwriter and watch the conversation change.

Maps to the **Lloyd's Market Association AI Governance Blueprint** · May 2026

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**PREPARED FOR**

UK general insurance brokers.  
Use alongside your compliance function and PI broker.

## BEFORE YOU BEGIN

# Why this worksheet exists

Six major carriers have filed AI exclusions in their policy wordings. The LMA blueprint sets the bar for what “good” AI governance looks like in the Lloyd’s market. If you cannot evidence the three things below, you are not arguing about price at renewal. You are arguing about whether cover exists at all.

This worksheet covers the three pillars from the LMA blueprint, plus a fourth section for the file you will hand to your underwriter.

1

Model Risk

2

Data Governance

3

Accountability

**Time required.** Allow three to five working days to complete it properly. Half a day will not survive a question.

## GROUND RULES

## How to use it

01

**One pass, right people**

Your IT lead, your DPO or equivalent, and the SMF who will own AI risk — in the room together.

02

**Be specific**

Vague answers fail. Name the tool, name the person, name the date.

03

**Log the gaps**

Where you cannot answer, write “gap” and add it to the action log at the bottom.

04

**Refresh on cadence**

Review quarterly. Refresh fully four weeks before PI renewal.

SECTION 1 · THE FOUNDATION

# AI tool inventory

Before you can govern anything, you need to know what is in the building. List every AI tool used by anyone in the business — including the ones the MD does not officially know about, free tools, browser extensions, and anything embedded in a wider platform.

#	Tool name	Vendor	Used by (team / person)	Business process it touches	Customer data? (Y/N)	Date added
1						
2						
3						
4						
5						
6						
7						

**Tools to actively check for — the ones brokers usually miss**

- ChatGPT, Claude, Gemini, Perplexity, Copilot (personal & business)
- AI note-takers on Teams, Zoom, Meet (Otter, Fathom, Granola, Read)
- Email assistants and reply generators
- CV screening or recruitment AI
- Quote accelerators or rating engines with embedded ML
- Claims triage or fraud detection tooling
- Marketing AI (image, copy, scheduling)
- Any browser extension your team installed themselves

SECTION 2 · PILLAR ONE

# Model risk

For each AI tool from Section 1, you need a file an underwriter will read. One row per tool.

Tool	What decisions / outputs does it influence?	How was the model tested before deployment?	Who reviews outputs, and how often?	What happens when it gets something wrong?	Last reviewed

### Notes on each column

**Decisions or outputs:** be specific. "Drafts client renewal emails", not "helps with admin". "Flags suspicious claims for human review", not "claims support".

**How tested:** vendor documentation, internal pilot, sample testing on historic cases, or no testing (write gap). Reference the document or person who can produce evidence.

**Review cadence:** weekly spot-check, every output reviewed, monthly audit, or none (write gap).

**When it gets it wrong:** documented incident log, rollback procedure, manual override, named escalation contact, or none (write gap).

### Materiality filter

Not every tool needs the same depth. Rank each one:

#### High

Touches pricing, underwriting, claims decisions, customer-facing output, or personal data. Full evidence required.

#### Medium

Internal productivity but with customer data exposure. Evidence of testing and review required.

#### Low

No customer data, no decision influence. Light-touch entry on the inventory.

SECTION 3 · PILLAR TWO

# Data governance

For each high- or medium-materiality tool from Section 2, complete this row.

Tool	Data going in (categories)	Data sources (systems it pulls from)	Where the data physically lives (region / vendor)	Who controls access	Vendor retrains on your data?	Contract clause ref.

**Data categories to check for**

- Personal data (names, contact details, DOB)
- Special category data (health, criminal records)
- Financial data (claims history, premiums, banking)
- Commercial confidential (client plans, contracts)
- Third-party data (shared by insurers / intermediaries)

**Retraining & contract questions to answer**

- Does the vendor’s standard contract permit retraining on your inputs?
- Have you opted out in writing?
- Where is the data processed and stored geographically?
- Sub-processors named and reviewed?
- Deletion rights and timelines documented?

If any answer is “I do not know”, that is a gap. **Log it.**

SECTION 4 · PILLAR THREE

# Accountability

An SMF must own AI risk. A named individual — not a function.

Named SMF accountable for AI risk	
Date appointed	
Sign-off recorded where (board minute, governance log, statement of responsibilities)	
Deputy or cover	
Reporting line to the board (frequency)	
Last board paper on AI risk (date & reference)	

## Roles below the SMF

Role	Named person	What they own
AI tool owner (per high-materiality tool)		Day-to-day review, incident logging
IT or technology lead		Vendor due diligence, technical controls
Data protection lead (DPO or equivalent)		DPIAs, ROPA entries, ICO compliance
Compliance lead		FCA and SMCR mapping
Training owner		Staff awareness, prompt hygiene, acceptable use policy

### Policy documents the SMF should be able to produce

- AI acceptable use policy (signed by every employee)
- Vendor due diligence file per tool
- DPIA for each high-materiality tool
- Training register
- Incident log with at least one entry
- Board minute approving the framework

Tick what exists. Anything unticked is a gap.

SECTION 5 · THE OUTPUT

# The underwriter file

The output of this worksheet is a single PDF you can email an underwriter or PI broker. It should contain, in this order:

- **One-page summary** — number of tools, materiality breakdown, named SMF, last review date
- The completed inventory table (Section 1)
- Model risk table for high-materiality tools (Section 2)
- Data governance table for high & medium tools (Section 3)

- Accountability page (Section 4)
- Action log (Section 6, below)
- Date and SMF signature

**Refresh this file four weeks before every PI renewal.**

SECTION 6 · CLOSE THE LOOP

# Action log

Every gap from Sections 1 to 4 lands here.

Gap	Owner	Action required	Target date	Status

SECTION 7 · THE HONEST MIRROR

# Self-score

Score each pillar honestly out of 10. The first time most brokers do this, the score is lower than they expected. That is the point.

Pillar	Score 0-10	Evidence	Top priority to fix
AI tool inventory completeness			
Model risk evidence			
Data governance evidence			
Accountability & SMF sign-off			
Underwriter-ready file			

**Total** \_\_\_\_\_ / 50
Add your five scores

- 40-50**      You can hand this to an underwriter today.
- 25-39**      You have a story. You need a fortnight to firm it up.
- Below 25**    This is the work for the next 90 days. Start with the inventory.

## SECTION 8 · THE PLAN

# The next 90 days

A working sequence, not a project plan.

**1-14**

DAYS

- Complete the inventory across every team.
- Appoint the SMF and minute it.
- Draft or refresh the AI acceptable use policy and circulate for sign-off.

**15-45**

DAYS

- DPIA the high-materiality tools.
- Vendor file for each (contract, retraining position, sub-processor list, region).
- Build the review cadence and log it.

**46-75**

DAYS

- Train the team. Record who attended.
- Run a tabletop incident (one tool, one wrong output, what happens next).
- Update the board paper.

**76-90**

DAYS

- Pull the underwriter file together.
- Internal sign-off by the SMF.
- Share with PI broker four weeks before renewal.

## About this worksheet

Built to map to the Lloyd's Market Association AI Governance Blueprint published May 2026. Covers model risk, data governance, and accountability — the three pillars the market is now scoring brokers against. Reviewed quarterly. Refreshed before every PI renewal.

If you want a working session to fill this in alongside your IT lead and your nominated SMF, book a strategy call.

[Book a Strategy Call →](#)

*Prepared for UK general insurance brokers. Not legal or regulatory advice. Use alongside your compliance function and PI broker.*