FOR AUDITORS AND INTERNAL AUDIT

12 questions to ask about human oversight of AI

And what to ask to see for each one.

Swipe →

WHY THESE QUESTIONS

The EU AI Act, ISO 42001 and the NIST AI RMF all ask for human oversight. How do you audit the humans?

Policies and model documentation are easy to show. The harder evidence is about people: who oversees which system, whether they are trained, whether they have the time and the authority, and what they actually did.

These twelve questions are written for high-risk systems under the EU AI Act. They are useful for any AI system an organisation relies on, AI agents included.

01

Which person, by name, is accountable for overseeing each AI system?

ASK TO SEE

The list of AI systems with one person's name next to each. A team or a department does not count.

EU AI Act Art. 26(2) · ISO/IEC 42001 cl. 5.3 · NIST AI RMF GOVERN 2.1

02

Who takes over when that person is ill, on leave or leaves the company?

ASK TO SEE

The named backup, and the record of the last hand-over.

EU AI Act Art. 26(2) · ISO/IEC 42001 cl. 5.3 · NIST AI RMF GOVERN 2.1

03

How many systems does each person oversee, and how many hours a week do they have for it?

ASK TO SEE

Hours available per person, set against the systems they watch.

EU AI Act Art. 26(2) “necessary support” · ISO/IEC 42001 cl. 7.1

04

What training did each overseer get, on AI in general and on this system?

ASK TO SEE

Training records per person, with dates.

EU AI Act Art. 4 and 26(2) · ISO/IEC 42001 cl. 7.2 · NIST AI RMF GOVERN 2.2

05

Can the overseer explain what the system is meant for and where its limits are?

ASK TO SEE

The written intended purpose. Then ask the person, not the document.

EU AI Act Art. 14(4)(a) and 26(1) · NIST AI RMF MAP 1.1

06

Who may pause or stop the system, and has anyone ever done it?

ASK TO SEE

The record of the last pause: who, when, why, and when it resumed.

EU AI Act Art. 14(4)(e) · NIST AI RMF MANAGE 2.4

07

Who may overrule an output of the system, and where is that recorded?

ASK TO SEE

The last override, with the reason the person gave.

EU AI Act Art. 14(4)(d) · NIST AI RMF MANAGE 4.1

08

How does an overseer raise a concern, and what happened to the last one?

ASK TO SEE

The concern, who picked it up, and how it was closed.

ISO/IEC 42001 cl. 10.2 · NIST AI RMF MANAGE 4.1

09

When did someone last confirm that the oversight still works?

ASK TO SEE

The last periodic sign-off, with a date and a name.

ISO/IEC 42001 cl. 9.1 and 9.3 · NIST AI RMF GOVERN 1.5 and MAP 3.5

10

In the last incident, who was told and how fast?

ASK TO SEE

The incident timeline: detected, reported, provider informed, closed.

EU AI Act Art. 26(5) and 73 · ISO/IEC 42001 cl. 10.2 · NIST AI RMF MANAGE 4.3

11

Who decided the risk class of the system, and on what grounds?

ASK TO SEE

The decision, the reason, the person and the date.

EU AI Act Art. 6 and Annex III

12

How do you know nobody edited these records after the fact?

ASK TO SEE

Proof that old entries cannot be altered or backdated, in a form someone outside the organisation can verify.

ISO/IEC 42001 cl. 7.5

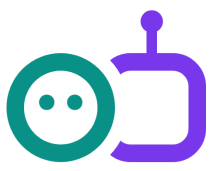
HOW TO USE THIS

A “yes” is not an answer. A record is.

For each question, ask for the record and the person. If the record sits in one place and takes a minute to show, oversight is organised. If it takes a week of e-mails, it is not.

Free to use, copy and adapt. Tell us which question is missing.

The references show where each topic sits in the EU AI Act (Regulation (EU) 2024/1689), ISO/IEC 42001:2023 and the NIST AI RMF 1.0. They are a starting point, not legal advice.



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